

## 4.3 HISTORIC RESOURCES

This section analyzes the impacts of the Community Memorial Hospital District Development Code on historic resources. The Initial Study (Appendix A) determined that the proposed Project would not result in impacts to pre-historic or archaeological resources.

### 4.3.1 Setting

**a. Historic Resources Surveys.** This discussion summarizes the findings of a Historic Resources Report conducted by San Buenaventura Research Associates (SBRA) (revised July 15, 2009) and a memorandum by SBRA (July 15, 2009). The SBRA investigation examined potential effects to historical resources from the Project through the use of field investigations and research conducted in March 2009. The full reports are contained in Appendix D. The purpose of the technical report was to identify and evaluate any historic resources that may be affected by development facilitated by the proposed Development Code and to recommend mitigation measures where appropriate. Field investigations, photography, and background research were completed to document existing conditions, identify character-defining features of those properties evaluated as significant, and define the historic resources in the vicinity of the Hospital District. Additional background and site-specific research was conducted in order to evaluate the properties within their historic context. National Register of Historic Places (NRHP), California Register of Historic Resources (CRHR) and City of Ventura criteria was employed to assess the significance of the properties.

The reports were presented to the Historic Preservation Committee (HPC) at their June 2009 meeting. The HPC requested additional information on three properties evaluated in the report: 2815 E. Main Street, 2841 Cabrillo Drive and 145 S. Brent Street. The HPC also requested a Ventura City Landmark eligibility evaluation for properties less than 50 years of age. The reports were revised to provide the requested information, which was derived primarily from planning files and plans located in the Building Department files. On July 27, 2009 the HPC approved the Historic Resources Reports and concluded demolition of the nine Project Area structures would not adversely affect historic resources.

**b. Historic Context of the Project Area.** The existing Community Memorial Hospital complex is the successor to the E.P. Foster Memorial Hospital building constructed on Loma Vista Road (then, Foothill Road) in 1930-31. The hospital was named after him in 1932 after his death which had originally been planned to be called the Hospital de Buena Ventura.

By the late 1920s and into the 1930s, little development had occurred in Ventura east of Seaward Avenue. The new, three and four-story hospital building was constructed on the eastern fringe of the city, in an area which was predominantly citrus and walnut orchards. The land selected for the hospital was a portion of a speculative subdivision, the Helene Park Tract, on land owned by Milan and Helen Wright. Recorded in 1929, the subdivision divided the triangle of land bounded by E. Main Street, Loma Vista (Foothill) Road and Joanne Avenue into city lots. The Wrights retained a parcel at the intersection of E. Main Street and Foothill Road (now Loma Vista Road), where their home was located.



The hospital purchased a block of undeveloped parcels within the tract along Loma Vista (Foothill) Road for the construction of the hospital building. The remaining parcels of the subdivision began to fill in with small single family residences starting during the mid-1940s. As the hospital began to dominate the area, many residences would be converted to doctor's offices and other medical uses.

The pace of commercial construction on the parcels oriented towards Main Street was set with the opening of the Sears Roebuck building at 2750 E. Main Street in 1948. Nearby commercial parcels along Main Street were developed over the next ten years, particularly as residential development rapidly pressed further east during the 1950s.

A one-story wing was added to the eastern side of the hospital in 1951. In 1962 the hospital's name was changed to Community Memorial Hospital, partly on the recommendation of Orpha Foster. The original hospital building was replaced by the present eight-story building during the early 1970s. With the continued expansion of the hospital, additional residences in the immediate neighborhood were converted to medical offices, or were demolished to make way for medical buildings.

A discussion of the regional historical setting of the City of Ventura can be found in the Historic Resource Report (Appendix D).

**c. Criteria for Evaluation of Historic Resources.** CEQA requires the evaluation of project impacts on historic resources, including properties "listed in, or determined eligible for listing in, the California Register of Historical Resources [or] included in a local register of historical resources." In analyzing the historic significance of properties located within the study area, various criteria for designation under federal, state, and local landmark programs were considered and applied, as described below. It should be noted, however, that pursuant to CEQA Section 15064.5(a)(4), "[t]he fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources...or identified in an historical resources survey...does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1."

Federal Regulatory Setting. The criteria for determining eligibility for listing on the National Register of Historic Places (NRHP) have been developed by the National Park Service. Properties may qualify for NRHP listing if they:

1. *Are associated with events that have made a significant contribution to the broad patterns of our history; or*
2. *Are associated with the lives of persons significant in our past; or*
3. *Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or*



4. *Have yielded, or may be likely to yield, information important in prehistory or history.*

According to the NRHP guidelines, the “essential physical features” of a property must be present for it to convey its significance. Further, in order to qualify for the NRHP, a resource must retain its integrity, or “the ability of a property to convey its significance.”

The seven aspects of integrity are:

1. *Location (the place where the historic property was constructed or the place where the historic event occurred)*
2. *Design (the combination of elements that create the form, plan, space, structure, and style of a property)*
3. *Setting (the physical environment of a historic property)*
4. *Materials (the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property)*
5. *Workmanship (the physical evidence of the crafts of a particular culture or people during any given period of history or prehistory)*
6. *Feeling (a property’s expression of the aesthetic or historic sense of a particular period of time)*
7. *Association (the direct link between an important historic event or person and a historic property).*

The relevant aspects of integrity depend upon the National Register criteria applied to a property. For example, a property nominated under Criterion A (events), would be likely to convey its significance primarily through integrity of location, setting and association. A property nominated solely under Criterion C (design) would usually rely primarily upon integrity of design, materials and workmanship.

The minimum age criterion for the NRHP is 50 years. Properties less than 50 years old may be eligible for listing on the NRHP if they can be regarded as “exceptional,” as defined by the NRHP procedures.

State of California Regulatory Setting. A resource is eligible for listing on the California Register of Historical Resources (CRHR) if it:

1. *Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;*
2. *Is associated with the lives of persons important in our past;*
3. *Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or*
4. *Has yielded, or may be likely to yield, information important in prehistory or history.*



The California Register procedures include similar language to the NRHP with regard to integrity. The minimum age criterion for the CRHR is 50 years. Properties less than 50 years old may be eligible for listing on the CRHR “if it can be demonstrated that sufficient time has passed to understand its historical importance” (Chapter 11, Title 14, §4842(d)(2)).

By definition, the California Register of Historical Resources also includes all “properties formally determined eligible for, or listed in, the National Register of Historic Places,” and certain specified State Historical Landmarks. The majority of “formal determinations” of NRHP eligibility occur when properties are evaluated by the State Office of Historic Preservation in connection with federal environmental review procedures (Section 106 of the National Historic Preservation Act of 1966). Formal determinations of eligibility also occur when properties are nominated to the NRHP, but are not listed due to owner objection.

Historic resources as defined by CEQA also include properties listed in “local registers” of historic properties. A “local register of historic resources” is broadly defined in §5020.1 (k) of the Public Resources Code, as “a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution.” Local registers of historic properties come essentially in two forms: (1) surveys of historic resources conducted by a local agency in accordance with Office of Historic Preservation procedures and standards, adopted by the local agency and maintained as current, and (2) landmarks designated under local ordinances or resolutions. These properties are “presumed to be historically or culturally significant... unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant.” (Public Resources Code §§ 5024.1, 21804.1, 15064.5).

City of Ventura Criteria. The City of Ventura Municipal Code, Chapter 24.455, *Historic Preservation Regulations*, establishes the procedures for identifying, designating, and preserving historic landmarks or points of interest. Pursuant to §24.455.120.2, a building, structure, archaeological excavation, or object that is unique or significant because of its location, design, setting, materials, workmanship, or aesthetic feeling may qualify as a landmark if it is marked by any of the following:

1. *Events that have made a meaningful contribution to the nation, state, or community*
2. *Lives of persons who made a meaningful contribution to national, state, or local history*
3. *Embodying the distinctive characteristics of a type, period, or method of construction*
4. *Reflecting or exemplifying a particular period of the national, state, or local history*
5. *The work of one or more master builders, designers, artists, or architects whose talents influenced their historical period, or work that otherwise possesses high artistic value*
6. *Representing a significant and distinguishable entity whose components may lack individual distinction*
7. *Yielding or likely to yield, information important to national, state, or local history or prehistory*

Pursuant to §24.455.120.3, any real property or object may qualify as a point of interest if:



1. *It is the site of a building, structure, or object that no longer exists but was associated with historic events, important persons, or embodied a distinctive character of architectural style.*
2. *It has historic significance, but was altered to the extent that the integrity of the original workmanship, materials, or style is substantially compromised.*
3. *It is the site of a historic event which has no distinguishable characteristics other than that a historic event occurred there and the historic significance is sufficient to justify the establishment of a historic landmark.*

Potential landmarks or points of interests are first considered by the City's HPC at a noticed public hearing and with the property owner's permission. The HPC then makes a recommendation to the Planning Commission. After consideration of the HPC's recommendation, the Planning Commission is responsible for making a recommendation to the City Council, which, after consideration at a noticed public hearing, has sole authority to designate landmarks or points of interest. Pursuant to General Plan Action 9.19, any project in a historic district or that would affect any potential historic resource, or structure more than 40 years old is required to perform an assessment of eligibility for the State and Federal registers, landmark status, and appropriate mitigation to protect the resource.

Pursuant to §24.455.510, it is unlawful for a property owner or any other person to carry out, cause, or permit the demolition or relocation of a designated historic landmark. Any such act shall constitute a misdemeanor and:

1. *The owner shall pay to the City the greater of \$10,000.00 or the appraised value of the landmark before demolition occurred minus the appraised value after such action.*
2. *No building permits shall be issued for new development on the property for a period of five years from the date of demolition.*

Exceptions to the rule exist as outlined in §24.455.520, the demolition or relocation of a historic landmark shall not constitute a misdemeanor as prescribed in section 2.430.510 if prior approval of the action was received from the historic preservation committee or, on appeal, from the planning commission or, on appeal from city council.

In addition to the designation of individual historical landmarks and points of interest, the Historic Preservation Committee, Planning Commission, and, ultimately, the City Council may designate certain areas of the City as Historic District (HD) Overlay Zones, pursuant to the City of Ventura Municipal Code, Chapter 23.340 and §24.455.310. The purpose of the HD Overlay Zone is to regulate a landmark, point of interest, or any combination thereof in order to:

1. *Protect against destruction or encroachment upon such areas and structures*
2. *Encourage uses which promote the preservation, maintenance, or improvement of landmarks and points of interest*
3. *Assure that new structures and uses within such areas will be in keeping with the character to be preserved or enhanced*
4. *Promote the educational and economic interests of the entire City*
5. *Prevent creation of environmental influences adverse to such purposes*



The procedure for establishing an HD Overlay Zone is similar to that required for designating a historical landmark or point of interest and includes recommendations by the Historic Preservation Committee and Planning Commission to the City Council for consideration at noticed public hearings. After designation as a historical landmark, point of interest, or Historic District, future development that might have an impact on designated buildings, structures, or areas is subject to design review for compliance with any architectural and development guidelines that the City Council has adopted as a part of the designation process.

The City has adopted the Mills Act, a state law that grants local governments the authority to directly implement a historic preservation program to encourage the preservation and restoration of designated Historic Landmarks. In exchange for property tax relief, property owners agree to maintain and preserve the exterior of their properties according to the Secretary of the Interior's Standards for the Treatment of Historical Properties guidelines.

**d. Project Area Cultural Resources.** Below is a discussion of the potentially historic properties within the Project Area that would be affected by hospital development as well as subsequent development under the CMH Code.

75 N. Brent Street. This one- and two-story single family residence is characterized by an irregular plan and intersecting low and medium-pitched shed roofs with medium open eaves and exposed rafters. The building is clad in wide horizontal ship-lap siding. Windows are wood frame sash and fixed units. An attached one-car garage is located to the rear (southern elevation). This residence was constructed in 1947 for Merrill E. Russell, a chiropractor, and his wife Irene. During the 1950s it was occupied by Roy Lyall, an electronics technician and his wife Irene, a dental assistant. By the 1970s it was used as a medical office. This modestly Modern Ranch style building appears to be unaltered.

85 N. Brent Street. This one story single family residence features an essentially rectangular plan and a medium-pitched front-facing gable roof with medium lap siding under the gable end. The building is otherwise clad in stucco. The side entry, located on the northern elevation, is situated above a low stoop. Windows are anodized aluminum, apparently new units within the original window openings. This residence was constructed in 1946, apparently for Elmer L. Webb, an oil worker, and his wife Helen. They lived in this residence until at least 1960. This modestly Minimal Traditional style residence appears to be somewhat altered.

95 N. Brent Street. This one story, stucco-clad single family residence features an L-plan and a side-facing medium-pitched gable roof with an intersecting front-facing medium-pitched gable roof with very shallow closed eaves. The entry is inset above a concrete stoop. Windows are wood frame sash, and anodized aluminum evidently replacing sash units within their original openings. This residence was constructed in 1946, apparently for Artie A. Robinson, a service station owner, and his wife Clemma. By the 1950s it was occupied by his station manager, Elmer Smith and his wife Dede. They remained until at least 1960. This very modestly Minimal Traditional style residence appears to be slightly altered.

107 N. Brent Street. This one-story stucco clad single family residence feature an L-plan with intersecting front and side-facing medium-pitched gable roofs with very shallow closed



eaves. The entry is located in the crook of the “L” facing the street intersection, above a low brick stoop. Windows are wood frame sash units. This residence was apparently constructed in 1946 for Roy A. Campbell, an oil worker. He remained until at least 1960. This modestly Minimal Traditional style residence appears to be unaltered.

145 N. Brent Street. This two-story medical office building features a rectangular plan and a flat roof behind a featureless parapet. The main eastern elevation features eight, shallow two-story bays of arched window openings with aluminum window mullions spaced regularly along the facade, with the entry located in the center bay. A similar treatment is seen along the southern elevation. This building, known as the Cabrillo Medical Building, was designed in 1966 and completed in 1967 in a Modern interpretation of the Spanish Revival style. The developer was a partnership known as the Ventura Land and Development Company. The architect for this building was Kenneth H. Hess of Ventura. A number of other architects are referenced on building permits, including Hummel, Rasmussen and Love of Ventura; and S.U.A of Beverly Hills, who were probably responsible for tenant improvements only. According to the original building plans, the lettering “Cabrillo” seen on the upper facade was designed by an Ojai graphic artist named James Kuche. No further information was located on this individual. This building appears to be unaltered.

2825 Cabrillo Drive. This two-story medical office building is rectangular in plan and features a flat roof behind a parapet. The roofline projects beyond the eastern elevation to cover a stairway to the second floor and a second floor balcony, supported by large rectangular columns. An under-building garage entrance is the dominant architectural feature of the southern street elevation. The first story of the building is poured-in place concrete. The second story is vertically board-formed poured-in-place concrete. The date of construction of this building was difficult to determine from the building permits. The most likely year is 1973. This building appears to be unaltered.

2841 Cabrillo Drive. This one-story medical office building is rectangular in plan and features a flat roof. The exterior cladding appears to be a composite wood or plywood material scored to resemble vertical planks. A wide cornice fascia decorated with raised panels runs the entire length of the main southern elevation. Windows are fixed aluminum units surrounded by thin wood casings. The date of construction of this building was difficult to establish from the building permits. It appears to be the combination of three buildings constructed in 1968, 1970 and 1972, altered to its current appearance in 1991. The architect, if any, is unknown.

2856 Cabrillo Drive. This two-story medical office building features an irregular plan and a flat roof. Its dominant architectural features are the angular southern elevation and stairway. The building is clad in narrow vertical wood siding. Windows are fixed, with narrow wood casings. This building was constructed in 1978-79, designed in the Modern style by Rasmussen and Ellinwood architects of Ventura. It appears to be unaltered.

2815 E. Main Street. The southern, street elevation of this two-story commercial building features two bays of unequal size divided by a massive stepped pilaster which projects over the parapet. Identical pilasters define the corners of the main elevation. The lower ground floor facade is characterized by an entry flanked by two, smaller-scale versions of the larger



pilasters, rising to mid-elevation and an anodized aluminum storefront. The upper elevation is characterized by stucco applied in a checkerboard pattern. Windows on the ground and upper facade are fixed, surrounded by wide stucco casings and topped by projecting lintels featuring dentil-like details. The cornice line reflects the design of window lintels. This building was constructed in 1959 as a single story building with rear mezzanine for McMahon Furniture, designed by Ventura architect Kenneth H. Hess.

As nearly as could be determined by the building and planning records, the building's Main Street elevation has been remodeled at least three times. The first alteration appears to have occurred in 1973 when the building was converted to Sawyer Business College, and a bar known as The Dock. This alteration resulted in the removal of most of the building's originally continuous storefront, which consisted of floor-to-ceiling plate glass windows with no bulkheads. The original upper facade, consisting of concrete blocks laid in a checkerboard pattern and a projecting, arched canopy was retained. An internal second story replaced the mezzanine. A proposed second alteration in 1977 was approved, but apparently not implemented. A third alteration permitted in 1986 appears to have resulted in the removal of the original projecting canopy and additional changes to the storefront to accommodate a new bar, known as The Library. The original upper facade was retained. The 1986 plans suggest additional alterations to the storefront occurring between 1973 and 1986, which are not otherwise documented. All photos included in the planning files have been scanned and are illegible.

The building's current appearance evidently resulted from alterations made in 2002, for which no planning records were available, and could be dated from building permits only. However based on a review of previous planning files, this alteration covered the only major remaining feature of the original building which had survived the previous alterations (the upper facade) with the current stucco treatment, and added the second floor windows, cornice line, and projecting pilasters. The current storefront treatment also appears to date almost entirely from the 1992 alterations.

Table 4.3-1 illustrates the potentially historical properties studied in the Historic Resources Report and their eligibility as historic resources. As indicated in Table 4.3-1, none of the properties are eligible as a historic resource. However, one property in the immediate vicinity of the Project Area, the Sears Roebuck building at 2750 E. Main Street, appears to be eligible for designation as a City Landmark for its role in the postwar development of east Ventura and as one of the most prominent examples of late Moderne style of architecture in the City.

The CMH Code would facilitate the addition of a shopfront frontage type to the eastern or southern boundaries of properties along Main Street between 2815 Main Street and Loma Vista Road. The intent of the shopfront frontage type (see Figure 2-6) is to orient these Midtown Code properties such that any boundaries facing open space or streets would be designed with pedestrian orientation. Phase I of the Project would include demolition of nine Project Area structures (45,506 sf of commercial/medical office use and 4 single family residences). One of these structures would be 2815 Main Street, which would be demolished to create a new street.



**Table 4.3-1  
Historical Properties**

Address	Building Use	Date	Eligibility
75 N. Brent Street	Single Family Residence	1947	Ineligible
85 N. Brent Street	Single Family Residence	1946	Ineligible
95 N. Brent Street	Single Family Residence	1946	Ineligible
107 N. Brent Street	Single Family Residence	1946	Ineligible
145 N. Brent Street	Medical Office Building	1967	Ineligible
2825 Cabrillo Drive	Medical Office Building	c.1973	Ineligible
2841 Cabrillo Drive	Medical Office Building	1968, 1970, 1972	Ineligible
2856 Cabrillo Drive	Medical Office Building	1978-79	Ineligible
2815 E. Main Street	Commercial Building	1959	Ineligible (altered)

*Source: San Buenaventura Research Associates, Historic Resources Report: Community Memorial Hospital Master Plan. Revised July 2009.*

Phase II would include buildout of the remainder of the Project Area, including remaining liner buildings, development along Loma Vista Road and Brent Street, and the new parking garage. Phase II would not involve demolition of any of the properties listed in Table 4.3-1.

Properties along Main Street would continue to be subject to the Midtown Corridors Code. These properties are required to undergo evaluation at the time development of a property with a structure of more than 40 years in age is proposed pursuant to Municipal Code Section 24M.100.045.M.1.a. The City has existing regulations in place that would require evaluation of any property for which a demolition permit is requested for a structure that is 40 years old at the time of application (Municipal Code Section 2R.450.220).

### 4.3.2 Impact Analysis

**a. Methodology and Significance Thresholds.** As previously noted, SBRA performed an historic resources technical report for the proposed project in 2009. The conclusions as to the significance of the effects of the proposed project on historic resources are based on the findings of the Historic Resources report, which is included in Appendix D.

According to PRC §21084.1, “a project that may cause a substantial change in the significance of an historical resource is a project that may have a significant effect on the environment.” By definition, a substantial adverse change means, “demolition, destruction, relocation, or alterations,” such that the significance of an historical resource would be impaired (PRC §5020.1(6)). For purposes of NRHP eligibility, reductions in a resource’s integrity (the ability of the property to convey its significance) should be regarded as potentially adverse impacts.



Further, according to the *CEQA Guidelines*, “an historical resource is materially impaired when a project... [d]emolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources [or] that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant.”

The lead agency is responsible for the identification of “potentially feasible measures to mitigate significant adverse changes in the significance of an historical resource.” The specified methodology for determining if impacts are mitigated to less than significant levels are the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings and the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), publications of the National Park Service. (PRC §15064.5(b)(3-4))

**b. Project Impacts and Mitigation Measures.**

**Impact HR-1 Construction under the CMH Code would involve demolition of nine structures under Phase I, none of which has been identified as eligible for historical listing. One property in the vicinity of the Hospital District is potentially eligible for Landmark status; however, Phase I and Phase II development facilitated by the CMH Code would not significantly affect this property. Therefore, impacts would be Class III, less than significant.**

As previously indicated, a historic resources evaluation was prepared by San Buenaventura Research Associates (July 2009). The Historic Preservation Committee (HPC) considered the report during meetings on June 29, 2009 and July 27, 2009. At the July 27, 2009 meeting, the HPC concluded that none of the properties that are proposed for demolition are eligible for the National or California Registers or the City of Ventura historic landmark or point of interest. As discussed above, Phase I would include demolition of nine structures. None of these structures is eligible as a potential historic landmark (see Table 4.3-1). Phase II would not include any demolition. Therefore, neither Phase I nor Phase II would result in any direct historic resource impacts.

The project would occur within the setting of one eligible property, the Sears Roebuck building at 2750 E. Main Street (the southwest corner of the intersection of Borchard Drive and Main Street). From 2010 to 2014, Phase I of the Project would be constructed. This construction would result in the removal of the building at 2815 E. Main Street for the construction of an access road. This activity would replace the existing building with a public street along the north side of Main Street, which provides a portion of the setting for the eligible property. However, the building to be demolished is located approximately 300 feet from the eligible



property, and is already substantially altered. Consequently, it contributes only marginally to the setting of the eligible property and its removal would not have a significant or adverse effect on the eligibility of the Sears Roebuck building. The Midtown Corridors Code would be altered to provide frontage standards to parcels along the west side of Main Street that will front a street or an open space area. No other changes to Main Street properties are proposed. Therefore, impacts are less than significant (SBRA, 2009).

Phase II would occur over a period of years and would include buildout of the remainder of the Hospital District, including remaining liner buildings, development along Loma Vista Road and Brent Street, and the new parking garage. Specifically, buildings 11, 12, 13, 14, 15, 16 & 17 (as shown on Figure 2-9 and in Table 2-3), and the parking garage would be constructed during Phase II. Phase II development is estimated to be about 162,950 square feet of medical office uses. Phase II development would occur within the interior of the Hospital District, along Loma Vista Road and Brent Street, and would not affect the setting along Main Street. Therefore, Phase II development would not have an adverse impact with respect to the Sears Roebuck Building. Therefore, Phase II development would have a less than significant impact.

The CMH Code also includes a provision that would require applicants for development proposals involving structures over 40 years in age to submit a historic, technical assessment (or "Phase I") prepared by a City-authorized historic professional (CMH Code Section 24SD:H1.100.0051.I.1.a). Subsequent to the review of the Phase I, if the Community Development Director determines a potential Historic Resource is present, but not formally designated as a landmark or already on a State or Federal register, the development proposal shall be reviewed by the Historic Preservation Committee (HPC) for compliance with the Secretary of the Interior's Standards and Guidelines for the Treatment of Historic Properties. Therefore, any properties that have not yet been evaluated would be evaluated at the time any proposal is initiated. Impacts to historic resources would not be significant.

**Mitigation Measures.** Mitigation is not required as the CMH Code would not result in any significant impacts to historic resources.

**Significance After Mitigation.** Historic resource impacts would be less than significant without mitigation.

**c. Cumulative Impacts.** Implementation of Phase I and Phase II of the Project, in combination with about 8,000 dwelling units and five million square feet of non-residential development under the 2005 General Plan could alter the historic character of the Hospital District and of Ventura as a whole. Underlying zoning for properties in the vicinity and along the western side of Main Street that are governed by the Midtown Code would allow development of up to six stories which could potentially change the setting in the vicinity of the Sears Roebuck Building. However, pursuant to General Plan Action 9.19 and Municipal Code Section 2R.450.220 and 24M.100.045.M.1.a, any project that affects a building more than 40 years old is subject to evaluation for potential historical resource impacts under CEQA. Therefore, as individual projects under the Midtown Code move ahead, they would be evaluated on an individual basis for the potential to affect historic resources. This would occur not only in the



vicinity of the Sears Roebuck building, but also citywide. Consequently, the potential for adverse cumulative effects would not be significant.

