

4.4 CULTURAL (HISTORIC) RESOURCES

4.4.1 INTRODUCTION

*This section analyzes the impacts of the Westside Community Planning Project on historic resources. The identification of potential resources within the Westside Community Plan area was prepared based upon the Westside Historic Context & Survey Report, City of Ventura, prepared by Galvin Preservation Associates Inc., in June 2011. The report is provided in **Appendix 4.4**. The identification of resources within the Redevelopment Project area was prepared based upon the Historic Resources Survey Update, City of Ventura, California, Downtown Specific Plan Area, prepared by Historic Resources Group in April 2007. This report is available for review at the City of Ventura.*

4.4.2 ENVIRONMENTAL SETTING

a. Existing Conditions

Historic Background

Ventura's Westside community exhibits some of the City's oldest, most diverse, and historically significant properties due to the manner in which the area was developed. The Westside Community Planning Project area contains a variety of different land uses including residential, retail, industrial, and office uses.

Ventura Avenue historically served as the primary commercial corridor, running through the center of the area and eventually connecting to Highway 33 and Ojai. The area was the home of a few of the City's early pioneering families who established small independent farms along the route. During this time, Ventura Avenue began to change. The Westside and Ventura Avenue areas initially developed as a rural area; however, after the discovery of oil along Ventura Avenue in the 1920s, the area experienced a localized boom. Many of the property owners subdivided their land and developed the tracts into small single-family parcels to provide modest housing for workers in the oil industry. Its location and proximity to the oil fields made it convenient for workers to walk to work. Also, in the 1920s commercial properties (small shops and grocery stores) popped up along Ventura Avenue to accommodate the needs of the surrounding residential neighborhoods.

Development became increasingly dense from the 1920s to the 1950s. Due to the mix of property uses and ages, the Westside Community Planning Project area exhibits a wide variety of property types and

architectural styles, demonstrating how this particular area in Ventura's history has evolved over time to accommodate the many changes in the area.

Resources Within the Westside Community Planning Project Area

Individual Resources

Properties Determined Eligible for Listing on the National Register of Historic Places

There are 26 properties within the Westside Community Plan area previously determined to be eligible for the National Register of Historic Places. However, after re-evaluation in 2011, some of these previously determined eligible properties have since been demolished or altered and no longer appear to meet the criteria for inclusion in the National Register due to a loss of historic integrity or are better suited for eligibility at the local level. A total of 10 properties currently appear eligible for the National Register. These properties are considered historic resources for the purposes of the California Environmental Quality Act (CEQA).

Properties Determined Eligible for Local Designation

There are 19 properties that were previously determined eligible for local designation within the Westside Community Plan area. In a few cases, these properties have undergone significant alterations since the prior evaluation and no longer appear eligible as local landmarks. Several new properties were identified in the current study that may have individual significance at the local level because they meet at least one of the City of Ventura's designation criteria. These are properties that are either (1) very good representations of their architectural style, are (2) the earliest properties that were constructed within the study area that still retain moderate to high level of historic integrity and original building materials, (3) are associated with significant local individuals, or (4) are good examples of at least one historic context.

Within the Westside Community Plan area, there are 25 properties that appear to be individually eligible for local listing or designation through this survey evaluation. An additional seven properties are already listed locally. These 32 properties are considered historic resources for the purposes of CEQA. In addition, there are also 52 properties that appear to be individually significant that are located within the existing Simson Tract Historic District or proposed East Lewis/Vince Streets Historic District boundaries (discussed below). These properties appear to be individually significant for contexts other than their contributions to the district's potential significance. These properties are also considered historic resources for the purposes of CEQA.

Within the Westside Community Plan area, a total of 49 properties were identified that may require further evaluation to determine if they are potential historic resources. This is due to the fact that the properties were either not visible from the public right of way, or appeared to have been moved to the survey area and, therefore, may have significance within an individual historic context or were located along the base of the hillside and may have a segment of the mission aqueduct present. Therefore, these properties will need to be evaluated on a case-by-case basis in the future to determine if they are a potential historic resource.

Districts

Simpson Tract Historic District

The Simpson Tract was established as a historic district by the City in 1991 because the area includes a group of related properties in their original setting. The boundaries include properties in the blocks bounded by Ventura Avenue, Sheridan Way and the properties on either side of West Simpson and West Prospect Streets. (See **Figure 4.4-1**.) The Simpson Tract is architecturally significant because it represents the working class neighborhood from the 1920s. The overall character of this tract reflects both the economy and architecture of the oil boom era. The Simpson Tract also has historical significance due to the major role it played in shaping the Avenue's history. It provided affordable housing for its workers, stimulated commercial growth along its main thoroughfare, and created the need for additional schools, roads, and City services in this area.

At the time that the Simpson Tract was designated a historic district in 1991, 88 properties were identified as contributing to significance of the historic district. The re-evaluation of the Simpson Tract Historic District in 2011 identified 168 properties that continue to contribute to the Simpson Tract Historic District, including those properties that are individually eligible for local listing. These properties are considered historic resources for the purposes of CEQA. The re-evaluation identified 126 non-contributing properties within the boundaries of the Simpson Tract Historic District. These properties do not currently contribute to the significance of the District, although some of the properties may have been contributing to the District in 1991. These properties are not historic resources for the purposes of CEQA but may warrant special consideration in local planning or zoning due to the fact that they are located within the designated historic district.

East Lewis/Vince Streets Potential Historic District

One additional area was identified that had a strong concentration of working class residential properties from the 1920s that is reflective of the working class neighborhoods that sprung up as a result of the oil

boom in the immediate area. The area is bounded by North Ventura Avenue on the west, the north side of East Lewis Street on the north, the base of the hillside on the east, and the south side of East Vince Street on the south. (See **Figure 4.4-1.**)

The potential East Lewis/Vince Street Historic District is significant as a geographically definable area possessing a significant concentration of working class residences that were planned and developed as a result of the 1920s oil boom in Ventura. The overall integrity of the East Lewis/Vince Street Historic District is good. A total of 95 of the 114 properties were identified as contributors to the significance of the District. This potential District and the contributing properties are considered historic resources for the purposes of CEQA.

Potential Conservation Areas

The City of Ventura has an interest in preserving its neighborhoods. However, not all neighborhoods within the City may have historic significance or have sufficient integrity to qualify as a historic district. Therefore, the historic report identified concentrations of properties within neighborhoods that still have concentrations of modest working class single-family residences and modest duplexes, courtyard housing, and apartment buildings from the 1920s that the City may be interested in preserving. Overall, the individual properties do not exhibit high levels of integrity, although some may still be fairly intact. These areas do not retain sufficient integrity as a whole to be considered a historic district.

These areas are considered Conservation Areas and may receive special consideration in local planning. Examples of special consideration may include special zoning to preserve the density and building heights, setbacks, and architectural styles, as applicable and as determined by the City during the Community Plan and Development Code process. These properties are not historical resources for the purposes of CEQA and they are not local landmarks; however, the properties within these areas may be subject to special zoning requirements to conserve the neighborhood character.

The Historic Survey identified four potential conservation areas: These include the El Medio Conservation Area, the West Mission Conservation Area, the Barry Drive Conservation Area, and the Ventura Avenue Industrial Conservation Area. Each is briefly described below.



SOURCE: Westside Historic Context and Survey Report - June 2011

FIGURE 4.4-1

Simpson Tract Historic District and East Lewis/Vince Street Potential Historic District

El Medio Conservation Area

The potential El Medio Conservation Area is bounded by the north side of East El Medio Street on the north, North Ventura Avenue on the west (not including commercial properties facing North Ventura Avenue), the south side of East Barnett Street on the south, and the base of the hillside on the east. (See **Figure 4.4-2.**) There are 258 properties located within the conservation area boundaries, 158 of which have been identified as contributing properties. The contributing properties are not considered historic resources for the purposes of CEQA but they may receive special zoning or consideration in the local planning process. A total of 100 properties do not contribute to the conservation area.

West Mission Conservation Area

The potential West Mission Conservation Area is bounded by the north side of West Harrison Street on the north, Highway 133 Easement on the west (not including the ball fields and community properties), the south side of West Mission Avenue on the south, and the west side of North Ventura Avenue on the east. (See **Figure 4.4-2.**) There are 266 properties located within the conservation area boundaries, 141 of which have been identified as contributing properties. The contributing properties are not considered historic resources for the purposes of CEQA but they may receive special zoning or consideration in the local planning process. A total of 125 properties do not contribute to the conservation area.

There are also 6 individually significant properties within the potential West Mission Conservation Area. These 6 properties are historic resources for the purposes of CEQA. They may also be subject to special zoning or planning requirements because they are located within the boundaries of the potential West Mission Conservation Area.

Barry Drive Conservation Area

The potential Barry Drive Conservation Area is located along the 200 and 300 blocks of Barry Drive. It is bounded by the north side of Barry Drive on the north, the west side of Cameron Street on the west, the south side of Barry Drive on the south, and the west side of Cedar Street on the east. (See **Figure 4.4-3.**) There are 53 properties located within the conservation area boundaries, 39 of which have been identified as contributing properties. The contributing properties are not considered historic resources for the purposes of CEQA but they may receive special zoning or consideration in the local planning process. A total of 14 properties do not contribute to the conservation area.

There are also six individually significant properties within the conservation area. These 6 properties are historical resources for the purposes of CEQA. They may also be subject to special zoning or planning requirements because they are located within the boundaries of the Barry Drive Conservation Area.

Ventura Avenue Industrial Conservation Area

The Ventura Avenue Industrial Conservation Area is located on either side of Ventura Avenue and is bounded by Rocklite Road on the north and East McFarlane Street on the south (See **Figure 4.4-3.**) The proposed area is significant for its concentration of industrial buildings constructed in period between 1945 and 1960, during Ventura's second oil boom. There are 16 properties located within the conservation area boundaries, nine of which have been identified as contributing properties. The contributing properties are not considered historic resources for the purposes of CEQA, but they may receive special zoning or consideration in the local planning process. A total of seven properties do not contribute to the conservation area.

Individual Resources Within the Westside Redevelopment Project area

The portion of the Westside Redevelopment Project area that is located outside (to the south of) the Westside Community Plan area is located within the Downtown Specific Plan Area. Within this portion of the Westside Redevelopment Project area, there is one property that is a listed City landmark and one property that appears to be individually eligible for local listing or designation. These properties are considered historic resources for purposes of CEQA.

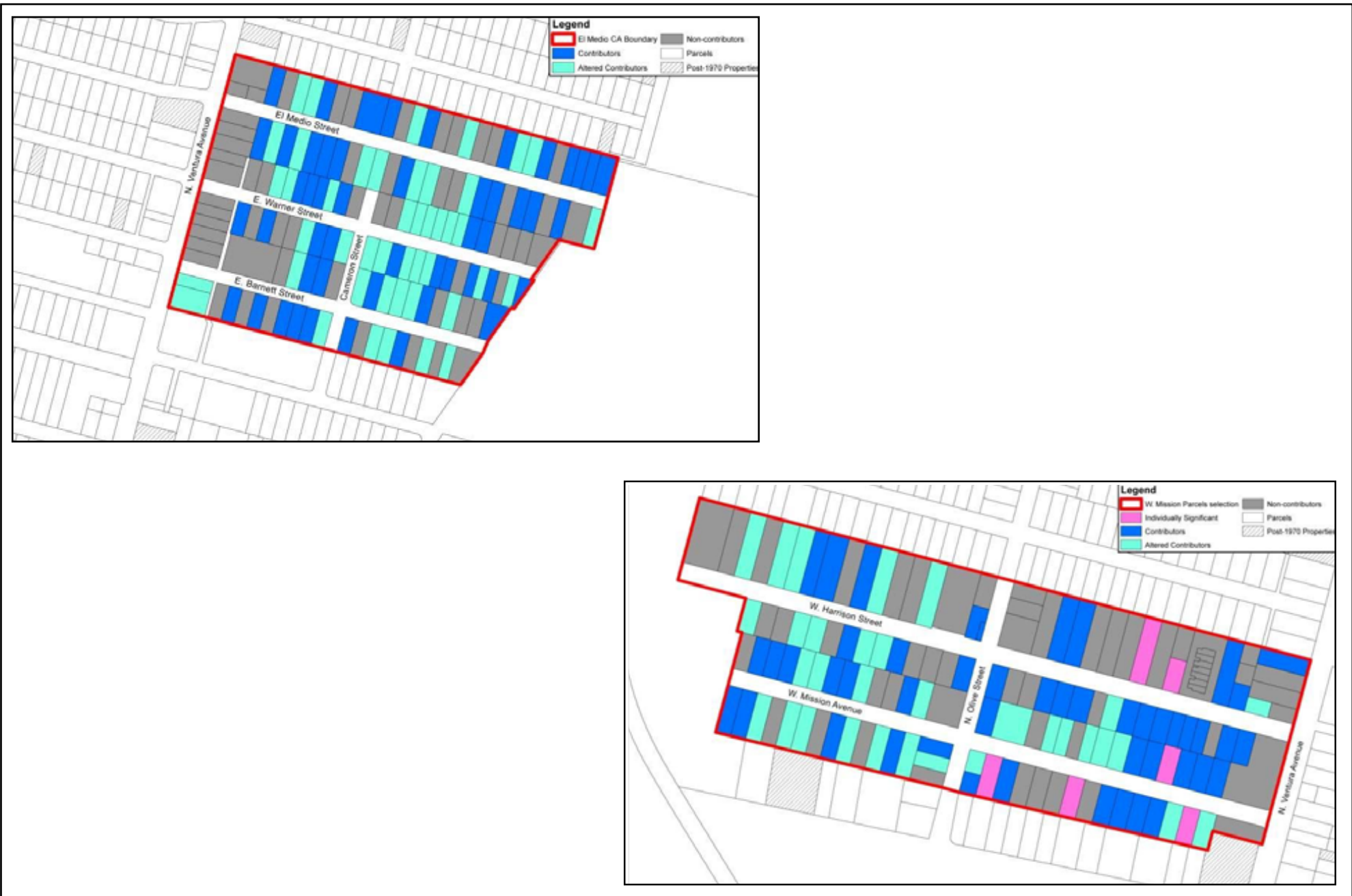
b. Regulatory Framework

Federal

National Register of Historic Places

The National Register of Historic Places (National Register) is the country's master inventory of known historic resources and includes listings of buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archaeological, or cultural significance at the national, state, or local level. The National Register criteria and associated definitions are outlined in National Register Bulletin Number 15: *How to Apply the National Register Criteria for Evaluation*. Bulletin Number 15 provides the following list of definitions:

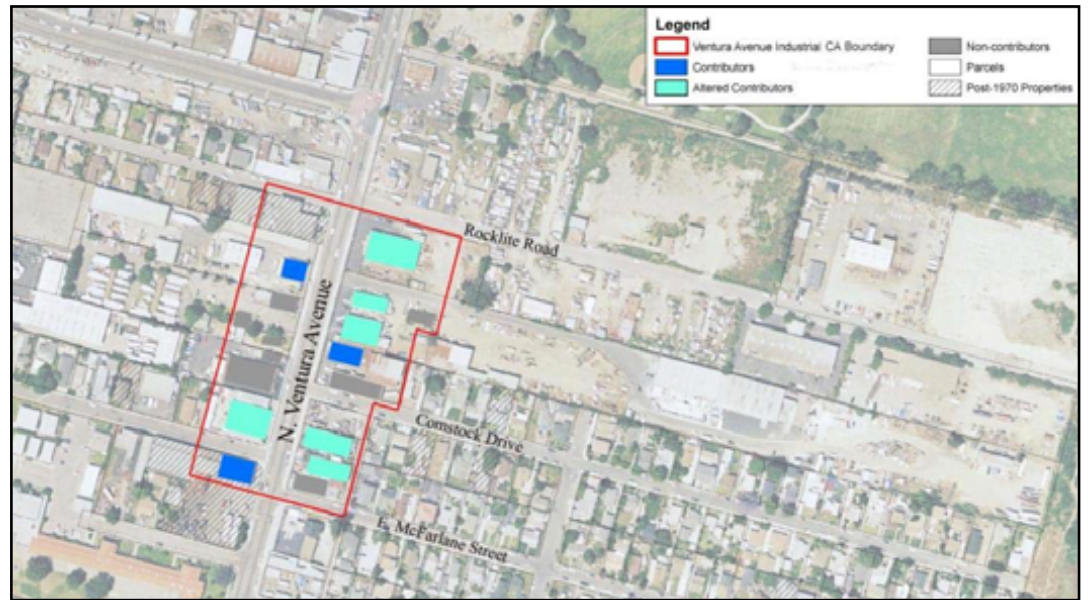
- A "structure" is a work made up of interdependent and interrelated parts in a definite pattern of organization. Generally constructed by humans, it is often an engineering object large in scale.



SOURCE: Westside Historic Context & Survey Report

FIGURE 4.4-2

El Medio and West Mission Potential Conservation Areas



SOURCE: Westside Historic Context and Survey Report - June 2011

FIGURE 4.4-3

Barry Drive and Ventura Avenue Industrial Potential Conservation Area

- A “site” is defined as the location of a significant event, a prehistoric or historic occupation or activity, or a building or structure, whether standing, ruined, or vanished, where the location itself maintains historical or archaeological value regardless of the value of any existing structure.
- “Buildings” are defined as structures created to shelter human activity.
- A “district” is a geographically definable area—urban or rural, small or large—possessing a significant concentration, linkage, or continuity of sites, buildings, structures, and/or objects united by past events or aesthetically by plan or physical development. A district may also comprise individual elements separated geographically but linked by association or history.
- An “object” is a material thing of functional, aesthetic, cultural, historical, or scientific value that may be, by nature or design, moveable yet related to a specific setting or environment such as a historic vessel.

Criteria

Title 36, Part 60 of the Code of Federal Regulations is a series of regulations that cover the National Register. Specifically, Title 36, Part 60.4 of the Code of Federal Regulations specifies the criteria applied to evaluate properties eligible for inclusion in the National Register. There are four criteria under which a structure, site, building, district, or object can be considered eligible for listing on the National Register. These include resources that are one or more of the following:

- **Criterion A:** Are associated with events that have made a significant contribution to the broad patterns of our history; or
- **Criterion B:** Are associated with the lives of persons significant in our past; or
- **Criterion C:** 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
- **Criterion D:** Have yielded, or may be likely to yield, information important in prehistory or history.¹

There is also a general stipulation that the resource (structure, site, building, district, and object) be at least 50 years old, although there are exceptions to that rule (see Title 36, Part 50.4 of the Federal Code of Regulations, Criteria Considerations a through q). Properties under 50 years of age that are of exceptional importance or are contributors to a district can also be included on the National Register. The eligibility of a cultural resource for nomination to the National Register may be based on any of the above four criteria together with their integrity.

¹ Code of Federal Regulations, Title 36, Part 60.4.

Historical period properties are best evaluated and supported by historical research, whereas Criterion D is typically documented by archaeological investigation. A property need not actually be listed on the National Register to be protected by the National Historic Preservation Act, but must be considered eligible for listing on the National Register. Archaeologists assess sites based on all four criteria, but prehistoric sites are primarily considered under Criterion D. If cultural resources do not meet the above criteria, they are not considered historical properties and are not further included in the Section 106 process.

Period of Significance

For any resource eligible for listing in the National Register, its period of significance must also be established. According to National Register Bulletin 16A, the period of significance is defined as the length of time that a property was associated with important events, activities, or persons, or attained the characteristics that qualify it for National Register listing. The following guidelines have been established to define the period of significance for resources meeting one or more of the four criteria of historical significance:

- Criterion A: For the site of an important event, such as a pivotal five-month labor strike, the period of significance is the time when the event occurred. For properties associated with historic trends, such as commercial development, the period of significance is the span of time when the property actively contributed to the trend.
- Criterion B: The period of significance for a property significant for Criterion B is usually the length of time the property was associated with the important person.
- Criterion C: For architecturally significant properties, the period of significance is the date of construction and/or the dates of any significant alterations and additions.
- Criterion D: The period of significance for an archaeological site is the estimated time when it was occupied or used for reasons related to its importance, for example, 3000–2500 BC.

Integrity

Integrity is the ability of a property to convey its significance. To be listed in the National Register of Historic Places, a property must not only be shown to be significant under the National Register criteria, but it also must have integrity. The evaluation of integrity is grounded in an understanding of a property's physical features and how they relate to its significance. The California Register utilizes the same aspects of integrity as the National Register. The City of Ventura does not define integrity in their designation requirements for historic significance.

Historic properties either retain integrity (that is, convey their significance) or they do not. Within the concept of integrity, the National Register criteria recognize seven aspects or qualities that, in various combinations, define integrity. These seven aspects include location, setting, design, materials, workmanship, feeling, and association.

To retain historic integrity, a property will always possess several, and usually most, of the aspects. The retention of specific aspects of integrity is paramount for a property to convey its significance. Determining which of these aspects are most important to a particular property requires knowing why, where, and when the property is significant. The following defines the seven aspects of integrity and explains how they combine to produce integrity.

- “Location” is the place where the historic property was constructed or the place where the historic event occurred.
- “Design” is the combination of elements that create the form, plan, space, structure, and style of a property.
- “Setting” is the physical environment of a historic property.
- “Materials” are 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.
- “Workmanship” is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- “Feeling” is a property’s expression of the aesthetic or historic sense of a particular period of time.
- “Association” is the direct link between an important historic event or person and a historic property.

Context

A property must also be significant within a historic context. National Register Bulletin 15 states that the significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are “those patterns, themes, or trends in history by which a specific [...] property or site is understood and its meaning [...] is made clear.”²

Districts

Standard preservation practice evaluates collections of buildings from similar periods and historic contexts as *districts*. The National Park Service defines a historic district as “a significant concentration,

² National Register Bulletin 15, 7.

linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.”³ A historic district derives its significance as a single unified entity.

Districts are comprised of resources that are identified as either contributing or non-contributing. Some resources within the boundaries of the district may not meet the criteria for contributing to the historic character of the district, although the resource is within the district boundaries.

Contributing resources add to the historic association, historic architectural qualities, or archaeological values for which the district is significant because the resource was present during the period of significance (the period of time during which the resource acquired its historically significant characteristics), relates to the documented significant contexts, and possesses integrity.

Non-contributing resources do not add to the historic associations, historic architectural qualities, or archaeological values for which the district is significant because the resource was not present during the period of significance, does not relate to the documented significant contexts, or does not possess integrity.

The Secretary of the Interior’s Standards for Rehabilitation

The *Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (Secretary’s Standards, or Standards)* was published in 1995 and codified as 36 CFR 67.⁴ Neither technical nor prescriptive, the *Standards* are intended to promote responsible preservation practices that help protect irreplaceable cultural resources.⁵ There are four overriding treatments discussed in the *Standards*: preservation, rehabilitation, restoration, and reconstruction. *The Secretary’s Standards* consist of 10 basic principles created to help preserve the distinctive character of a historic building and its site while allowing for reasonable change to meet new needs. The *Standards* apply to historic buildings of all periods, styles, types, materials, and sizes, and apply to both the exterior and the interior of historic buildings. They also encompass related landscape features and the building’s site and environment, including attached, adjacent, or related new

³ National Register Bulletin 15, 5.

⁴ “Preservation” acknowledges a resource as a document of its history over time and emphasizes stabilization, maintenance, and repair of existing historic fabric. “Rehabilitation,” while also incorporating the retention of features that convey historic character, also accommodates alterations and additions to facilitate continuing or new uses. “Restoration” involves the retention and replacement of features from a specific period of significance. “Reconstruction,” the least-used treatment, provides a basis for recreating a missing resource.

⁵ Weeks, Kay D. and Anne E. Grimmer. 1995. *The Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstruction Historic Buildings*. Washington DC: US Department of the Interior, National Park Service.

construction. The *Standards* have been adopted, or are used informally, by many agencies at all levels of government to review projects that affect historic resources, and are used as a measure in determining whether or not a project or new development or rehabilitation adversely impacts a historic resource.

The purpose of the *Standards* is to promote responsible preservation practices that help to protect irreplaceable cultural resources, to provide philosophical consistency in the preservation component of a development project, and to guide essential decisions about the treatments to these properties. The preamble to the *Standards* states that they “are to be applied to specific rehabilitation projects in a reasonable manner, taking into consideration economic and technical feasibility.”

The 10 principles of the *Secretary’s Standards* are provided below:

1. A property shall be used as its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
2. The historic character of a property shall be retained and preserved. The removal of distinctive materials or alteration of features, and spaces that characterize a property shall be avoided.
3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.
4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.
5. Distinctive features, finishes and construction techniques or examples of craftsmanship that characterize a property shall be preserved.
6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture and other visual qualities and, where possible, materials. Replacement of missing features will be substantiated by documentary, physical or pictorial evidence.
7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.
8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.

Infill and redevelopment projects that could affect historic resources may be subject to review based on principles 9 and 10 of the *Standards*, which are:

9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be

compatible with the massing, size, scale, and architectural features to protect the integrity of the property and its environment.

10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

State

California Public Resources Code

The California Public Resources Code defines any unauthorized disturbance or removal of a fossil locality or remains on public land as a misdemeanor,⁶ and requires reasonable mitigation of adverse environmental impacts that result from development of public land and affect paleontological resources.⁷

California Register of Historical Resources

The California State Historical Resources Commission has designed this program for use by state and local agencies, private groups and citizens to identify, evaluate, register, and protect California's historical resources. The California Register is the authoritative guide to the state's significant historical and archaeological resources. The California Register program encourages public recognition and protection of resources of architectural, historical, archaeological, and cultural significance, identifies historical resources for state and local planning purposes, determines eligibility for state historic preservation grant funding, and affords certain protections under CEQA.

The criteria for inclusion in the California Register of Historical Resources include any object, building, structure, site, area, place, record, or manuscript that is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Generally, a resource shall be considered "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4852) which includes the following criteria:

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;

⁶ California Public Resources Code, Section 5097.5 (Statute 1965, Chapter 1136, Paragraph 2792).

⁷ California Public Resources Code, Section 30244.

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 automatically includes the following:

- California properties listed or formally determined eligible for listing in the National Register of Historic Places
- California Registered Historical Landmarks from No. 0770 onward
- California Points of Historical Interest that have been evaluated by the Office of Historic Preservation and have been recommended to the State Historical Resources Commission for inclusion in the California Register

Other resources may be nominated for listing in the California Register based on the criteria stated above.

Additionally, a resource must retain historic architectural integrity in terms of location, design, setting, materials, workmanship, feeling, and association. The California Register procedures include language similar to the National Register criteria (discussed above) with regard to integrity.

As with the National Register, the minimum age criterion for the California Register is 50 years. Properties less than 50 years old may be eligible for listing on the California Register "if it can be demonstrated that sufficient time has passed to understand its historical importance."⁸

The California Register may also include properties listed in "local registers" of historic properties. A "local register of historic resources" is broadly defined in Public Resources Code Section 5020.1(k) 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 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 (Public Resources Code Sections 5024.1, 21804.1, 15064.5).

California Environmental Quality Act

Section 21084.1 of the Public Resources Code provides the framework for determining whether a property is a historic resource for CEQA purposes.

⁸ California Code of Regulation, Chapter 11, Title 14, Section 4842(d)(2).

A resource is considered historically significant, and therefore a historical resource under CEQA, if it falls into one of the three following categories as defined by Section 21084.1 of the California Public Resources Code:

- “Mandatory historical resources” are resources “listed in, or determined to be eligible for listing in, the California Register of Historical Resources.”
- “Presumptive historical resources” are resources “included in a local register of historical resources, as defined in subdivision (k) of Section 5020.1, or deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1” of the Public Resources Code, unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant.
- “Discretionary historical resources” are those resources that are not listed but determined to be eligible under the criteria for the California Register of Historical Resources.⁹

A lead agency must consider a property a historic resource under CEQA if it is listed in, or determined to be eligible for listing in, the California Register. Historical resources included in a local register of historical resources, as defined in subdivision (k) of Section 5020.1, or deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1, are presumed to be historically or culturally significant for purposes of CEQA, unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant. The 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 not identified in an historical resources survey meeting the criteria of subdivision (g) of Section 5024.1, shall not preclude a lead agency from determining whether the resource may be an historical resource for purposes of CEQA.¹⁰

The 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 (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) 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 50241.

Direct impacts may occur by physically damaging, destroying, or altering all or part of the resource; altering characteristics of the surrounding environment that contribute to the resource's significance; or neglecting the resource to the extent that it deteriorates or is destroyed.

⁹ California Public Resources Code, Section 21084.1.

¹⁰ California Public Resources Code, Section 21084.1.

Direct impacts can be assessed by identifying the types and locations of proposed development, determining the exact locations of cultural resources, assessing the potential significance of the resources that may be affected, and determining the appropriate mitigation.

Indirect impacts primarily result from the effects of growth or development adjacent to a historic resource. Such growth or development can result in increased construction as well as increased recreational activities that can disturb or destroy cultural resources. Due to their nature, indirect impacts are much harder to assess and quantify.

Under *State CEQA Guidelines* Section 15064.5(b)(3), generally, 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 Buildings* (1992) or the *Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings* (1995), shall be considered as mitigated to a level of a less than significant impact on the historical resource. Although compliance with the *Standards* is presumed to constitute a less than significant impact on historical resources, compliance is not the sole criteria for determining whether a project would cause a substantial adverse change in the significance of an historic resource, and a failure to comply with the *Standards* may or may not constitute a significant impact or substantial adverse change under the *State CEQA Guidelines*.

City

General Plan

The 2005 General Plan identifies the following policies pertaining to historic resources in Chapter 9, Our Creative Community.

Policy 9C: Integrate local history and heritage into urban form and daily life.

Action 9.10: Provide incentives for preserving structures and sites that are representative of the various periods of the City's social and physical development.

Action 9.11: Organize and promote multi-cultural programs and events that celebrate local history and diversity.

Action 9.12: Allow adaptive reuse of historic buildings.

- Action 9.13: Work with community groups to identify locations for facilities that celebrate local cultural heritage, such as a living history Chumash village and an agricultural history museum.
- Policy 9D: Ensure proper treatment of archaeological and historic resources.
- Action 9.14: Require archaeological assessments for projects proposed in the Coastal zone and other areas where cultural resources are likely to be located.
- Action 9.15: Suspend development activity when archaeological resources are discovered, and require the developer to retain a qualified archaeologist to oversee handling of the resources in coordination with the Ventura County Archaeological Society and local Native American organizations as appropriate.
- Action 9.16: Pursue funding to preserve historic resources.
- Action 9.17: Provide incentives to owners of eligible structures to seek historic landmark status and invest in restoration efforts.
- Action 9.18: Require that modifications to historically designated buildings maintain their character.
- Action 9.19: For any project in a historic district or that would affect any potential historic resource or structure more than 40 years old, require an assessment of eligibility for State and federal register and landmark status and appropriate mitigation to protect the resource.
- Action 9.20: Seek input from the City's Historic Preservation Commission on any proposed development that may affect any designated or potential landmark.
- Action 9.21: Update the inventory of historic properties.
- Action 9.22: Create a set of guidelines and/or policies directing staff, private property owners, developers, and the public regarding treatment of historic resources that will be readily available at the counter.

Action 9.23: Complete and maintain historic resource surveys containing all the present and future components of the historic fabric within the built, natural, *and* cultural environments.

Action 9.24: Create a historic preservation element.

Historic Preservation Regulations

The City of Ventura has adopted historic preservation regulations for the purpose of establishing procedures for identifying, designating, and preserving historic landmarks or points of interest that were the site of a historic event, that are connected with the life of an important person, or that contain a building, structure, or other object that is architecturally significant, representative of a type, period or particular method of construction, or is associated with a significant builder, architect, designer, or artist. (City's Municipal Code, Division 24, Chapter 455, Section 110 et seq.) Section 24.455.120 of the City's code defines Historic District, Landmarks, and Points of Interest as described below.

Historic District means a geographically definable area possessing a significant concentration, linkage or continuity of site, properties, structures and/or objects united by past events, or aesthetically by plan or physical development, regardless of whether such a district may include some properties, structures, sites, objects, or open spaces that do not contribute to the significance of the district.

A historic district can generally be distinguished from surrounding areas (1) by visual change such as building density, scale, type, age, or style; or (2) by historic documentation of different associations or patterns of development. The number of non-significant properties a historic district can contain yet still convey its sense of time and place and historical development depends on how these properties impact the historic district's integrity.

Landmark means any real property such as building, structure, archaeological excavation, or object that is unique or significant because of its location, design, setting, materials, workmanship, or aesthetic feeling, and is associated with:

- a. Events that have made a meaningful contribution to the nation, state, or community;
- b. Lives of persons who made a meaningful contribution to national, state, or local history;
- c. Reflecting or exemplifying a particular period of the national, state, or local history;
- d. Embodying the distinctive characteristics of a type, period, or method of construction;

- e. 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;
- f. Representing a significant and distinguishable entity whose components may lack individual distinction; or
- g. Yielding, or likely to yield, information important to national, state or local history or prehistory.

“Point of interest” means any real property or object

- a. that 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;
- b. that has historic significance, but was altered to the extent that the integrity of the original workmanship, materials, or style is substantially compromised;
- c. that 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.

Historic District (HD) Overlay Zones

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 Section 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:

- A. Protect against destruction or encroachment upon such areas and structures.
- B. Encourage uses that promote the preservation, maintenance, or improvement of landmarks and points of interest.
- C. Assure that new structures and uses within such areas will be in keeping with the character to be preserved or enhanced.
- D. Promote the educational and economic interests of the entire City.
- E. Prevent creation of environmental influences adverse to such purposes.

Historic Preservation Committee

The City has an interest in identifying, preserving, and protecting its significant architectural resources. Therefore, the City established a Historic Preservation Committee in 1973 under Ordinance No. 1801, which is comprised of a seven-member board appointed by the City Council. The City's landmarks ordinance outlines procedures for identifying historic resources within the City. The Committee maintains a master list of Historic Landmarks and Districts in the City of Ventura. Currently, there are 104 properties and 4 districts.

Municipal Code

The City Municipal Code, Section 2R.450.220, includes a requirement that if a demolition permit is requested for a building or structure more than 40 years old at the time of application, the request will be referred to the Director of the Planning. The Director has the discretionary authority to require, among other things, the completion of a historic resource assessment for the subject property prior to the issuance of such permit to determine whether conditions may need to be imposed for proper treatment of a potential historic resource, compliance with CEQA, and conformance to the General Plan.

Mills Act

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.

4.4.3 IMPACT ANALYSIS

a. Thresholds of Significance

Based on Appendix G of the *State CEQA Guidelines* under Section V, Cultural Resources, the following significance threshold is used to evaluate impacts related to Historical Resources.

CR-1 Would the project cause a substantial adverse change in the significance of an historical resource as defined in Section 15064.5?

Based upon Appendix G of the *State CEQA Guidelines* under Section V, Cultural Resources, a project may have a significant impact related to Archaeological and Paleontological Resources if the project would:

- V.b Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5; or
- V.c Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature; or
- V.d Disturb any human remains, including those interred outside of formal cemeteries.

The project would have a less than significant impact related to significance thresholds V.b, V.c, and V.d, and detailed analysis in the EIR is not required. These significance thresholds are discussed in **Section 8.0, Effects Found Not to be Significant.**

b. Methodology

The identification of resources within the Westside Community Plan area was prepared based on the *Westside Historic Context & Survey Report, City of Ventura*, prepared by Galvin Preservation Associates Inc. in June 2011. The report is provided in **Appendix 4.4**. The report included (1) the development of an updated historic context focused on the Westside Community Plan area, (2) the reconnaissance and inventory of all properties within the Westside Community Plan area, (3) the updating of previous survey data from a 1983 survey, and (4) an intensive level survey of select properties within the survey area that may have individual historic significance. The identification of resources within the Redevelopment Project area was prepared based upon the *Historic Resources Survey Update, City of Ventura, California, Downtown Specific Plan Area*, prepared by Historic Resources Group in April 2007. This report is available for review at the City of Ventura. The City of Ventura’s 2005 General Plan and General Plan Final Environmental Impact Report (2005) were also referenced.

c. Analysis, Mitigation Measures, and Residual Impacts

Westside Community Plan and Development Code Components

Upon adoption, the proposed Westside Development Code would become a subpart of the Zoning Ordinance and the Municipal Code. As is the case with other provisions of the Zoning Ordinance, all other provisions of the Municipal Code would continue to apply within the Westside Community Plan area except as expressly provided to the contrary in the Development Code.

The purpose of the Westside Community Plan related to historic resources is to conserve and protect the City’s cultural and historic resources. The Westside Community Plan contains the following policies and actions pertaining to historic resources in Chapter 12.3, Our Well Planned Community.

Policy 12M: Preserve existing Westside neighborhood character and integrate local history and cultural heritage into urban form and daily life.

Action 12.3.4: Coordinate with neighborhoods and the Historic Preservation Committee to designate a historic district between Lewis and Vince Streets and adopt design guidelines as identified in 2011 Westside Historic Preservation Survey.

Action 12.3.5: Maintain the scale of new buildings compatible with existing neighborhoods.

Action 12.3.8: Maintain the existing historically built character with regard to the increments of building, blocks, and neighborhoods that form the Westside.

The goals, policies, and objectives of the Development Code are designed to minimize impacts on cultural resources. The purpose of the Development Code pertaining to historic resources is to conserve and protect the City's cultural and historic resources.

The Westside Community Development Code contains the following approval requirements related to the treatment of identified and potential historical resources:

1. All new development subject to the Westside Development Code shall be evaluated as follows:
 - a. Applications for all development proposals involving structures over 40 years in age shall include a historic, technical assessment (or "Phase I") prepared by a City-designated historic professional, unless determined by the Westside Historic Context and Survey Report to not be considered eligible as a historic resource, pursuant to CEQA.
 - b. Upon reviewing a Phase I historic assessment, the Community Development Director may request additional documentation in the form of a Phase II study.
 - c. Community Development Department staff shall evaluate the Phase I and/or Phase II to determine whether the application involves a Historic Resource as defined by CEQA.
 - d. If the Director determines a potential Historic Resource is present, but not formally designated as a City 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.
 - e. If the Community Development Department Director determines a Historic Resource is not present, the development proposal shall be reviewed pursuant to the standards in Sections 24W.200 -24W.206.

2. All requests to demolish a structure over 40 years of age in the Westside Area, unless determined by the Westside Historic Context and Survey Report to not be a historic resource, pursuant to CEQA, shall be evaluated as follows regardless of whether new development or redevelopment is being proposed for the property in conjunction with such demolition:
 - a. The Demolition Permit application shall include a Phase I assessment. The Community Development Director or Building Official may request additional documentation via a Phase II study based on the conclusions of the Phase I assessment.
 - b. Community Development Department staff shall evaluate the Phase I and/or Phase II study to determine whether the demolition permit application affects a Historic Resource.
 - c. If the Director determines that a potential Historic Resource would be in part or wholly, demolished, an Initial Study shall be prepared for purposes of further CEQA evaluation.
 - d. The Historic Preservation Committee (HPC) shall review, and if prepared, the resulting environmental document and Demolition Permit application at a public hearing with prior publication and mailed notice. Following the public hearing, the HPC may approve, conditionally approve, or deny the Demolition Permit application depending upon its ability to cause a significant environmental impact relative to the Historic Resource.

Historic District Overlay Zone

The Westside Development Code contains a Historic District Overlay Zone. Overlay Zones are applied to specific areas to provide for modified development standards in the underlying Transect Zone to further control the scale of new development to ensure compatibility with adjacent neighborhoods. For instance, an overlay zone may modify some combination of the allowed building height, allowed frontage types, or specific setbacks requirements within the Overlay area as designated on the Regulating Plan, while leaving the other standards of that zone intact.

The Historic District Overlay Zone identifies neighborhood areas that exhibit numerous potential historic resources that contribute to the historic character of early 20th Century housing development within the Westside Community Plan area. Potential areas have been identified as part of the Westside Historic Context and Survey Report based upon the historic resources report prepared for this Westside Community Plan area. The Historic District Overlay Zone provides measures that ensure that future redevelopment or remodeling of property is conducted with respect to the context and form of an existing or potential proposed Historic Districts in the future. The creation of any new Historic Districts and Design Guidelines for such districts would be a result of neighborhood input and further developed as stand-alone guidelines.

Development proposals including additions or alterations on properties that are identified as contributors are required to incorporate a background assessment of properties to determine historic significance and

would be evaluated against the design recommendation of the historic district by the Historic Preservation Committee. Guidelines have already been established for the Simpson Historic Tract pursuant to City Council Ordinance 90-4, which govern setback standards and design guidelines. Specific guidelines for each historic district would govern over the urban standards of the underlying T zone.

Conservation Areas

Conservation areas are not currently defined in the City's municipal code but are a concept recommended in the Westside Historic Survey Report. The historic survey report prepared for the Westside Community Plan area identified four potential Conservation Areas. A Conservation Area is a tool that is used to protect the general architectural character of neighborhoods where the overall integrity does not meet the criteria for a historic district but where the concentration of resources with high integrity warrants consideration in local planning. This may be accomplished through special planning considerations by developing or revising development standards (the scale, neighborhood landscape features, setbacks, building types and styles, height of buildings, setbacks from property lines, etc.) to discourage the wholesale demolition of a structure. Local governments may develop regulations for individual neighborhood conservation districts that are tailored to the needs of the particular neighborhood and are generally less strict than those in historic districts. Conservation Areas may be administered by the local property owners that reside in the neighborhood (such as neighborhood-specific review commission that includes knowledgeable City staff) or may be governed by existing bodies such as a Historic Preservation Committee or a Planning Division. Conservation Areas may regulate change through zoning to preserve the use, character, and scale of a neighborhood by regulating substantial alterations or demolition of properties within the area boundaries.

Westside Redevelopment Project Area

Within the proposed Westside Redevelopment Project area, land uses and standards would incorporate existing City of Ventura General Plan policies. New development within the proposed Redevelopment area would consist of uses consistent with the General Plan, any applicable specific plans, zoning ordinances, and all other state and local guidelines, as currently adopted or amended from time to time. In addition, building standards for the proposed Redevelopment Project would be regulated by the Westside Development Code. The proposed Redevelopment Plan would not institute land use policies not otherwise permitted by the General Plan.

Downtown Specific Plan

The portion of the Westside Redevelopment Project area located outside the Westside Community Plan area is located within the City's adopted Downtown Specific Plan Area. The Downtown Specific Plan and Development and Streetscape Plan contain the following policies and actions intended to protect and preserve identified and potential historic resources:

Policy 1A Enhance, preserve and celebrate the Downtown's historic and prehistoric resources.

Action 1.1 Conduct a historical survey of Downtown properties in accordance with National Register Bulletin #24 Guidelines for Local Surveys: A Basis for Preservation Planning that includes the following:

1. Inventory of above ground historic, architectural, and cultural resources;
2. Inventory of below ground prehistoric, historic, and cultural resources;
3. Inventory of potentially significant historic districts that classifies buildings according to categories of importance, which may include the following:
 - a. Individually significant buildings, e.g., local landmarks including points of interest and contributing buildings, national historic landmarks, or those listed in the National Register of Historic Places or state register.
 - b. Contributing buildings - buildings of importance to the understanding of an identified historic district.
 - c. Non-contributing buildings - buildings located within an identified historic district that do not contribute to the understanding of the district and/or are not individually historically or culturally significant.

- Action 1.2 Require all new development on a lot containing a Historic Resource to be reviewed by the Historic Preservation Committee for compliance with this plan’s Historic Resource Design Guidelines and the Secretary of the Interior’s Standards and Guidelines for the Treatment of Historic Properties.
- Action 1.3 Require all new development contiguous to a lot containing a Historic Resource to be reviewed by the Historic Preservation Committee (HPC) for compliance with this plan’s Historic Resource Design Guidelines and by the Design Review Committee (DRC) for compliance with the Development Code.
- Action 1.4 Prior to completion of the survey identified in Action 1.1, all new development in Downtown shall be evaluated as follows:
1. Applications for all development proposals involving structures over 40 years of age shall include a CEQA-based historic, technical assessment (or “Phase I”) prepared by a City-designated historic preservation professional and funded by the applicant.
 2. The Community Development Director may request additional documentation via a Phase II study (also funded by the applicant).
 3. Community Development Department staff shall evaluate the Phase I and/or Phase II to determine whether the application involves a Historic Resource.
 4. When the Community Development Department staff determines a Historic Resource is present but not formally designated as a landmark, 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 and this plan’s Historic Resource Design Guidelines, in addition to any review procedures required pursuant to the Development Code.

5. When the Community Development Department staff determines a Historic Resource is not present, the development proposal shall be reviewed pursuant to the Development Code.

Action 1.5

Prior to completion of the survey identified in Action 1.1, all new requests to demolish a structure over 40 years of age shall be evaluated as follows:

1. The Demolition Permit application shall include a CEQA-based historic, technical assessment (or Phase I) prepared by a City-designated historic preservation professional and funded by the applicant.

2. The Community Development Director or Building Official may request additional documentation via a Phase II study (also funded by the applicant).

3. Community Development Department staff shall evaluate the Phase I and/or Phase II study to determine whether the application involves a Historic Resource.

4. If Community Development Department staff determines that a potential Historic Resource would be in part or wholly demolished, an Initial Study shall be prepared.

5. The Historic Preservation Committee (HPC) shall review the resulting environmental document and Demolition Permit application. The HPC may approve, conditionally approve, or deny the Demolition Permit application depending upon its ability to cause a significant environmental impact relative to the Historic Resource.

Analysis

CR-1 Would the project cause a substantial adverse change in the significance of an historical resource as defined in Section 15064.5? (Class III, Not Significant)

The project proposes the adoption of the *Westside Community Plan*, the *Westside Community Development Code*, and the *Westside Redevelopment Area Plan*.

Westside Community Plan Area

The project includes the proposed adoption of the Westside Community Plan and the Westside Development Code. One purpose of the Westside Community Plan related to historic resources is to conserve and protect the City's cultural and historic resources. The project includes the proposed adoption of a general plan amendment to the Land Use Element and Transportation Element and proposed adoption of a zoning code amendment to create consistency between the *Westside Community Plan* and the City's General Plan and Municipal Code.

No specific development proposals are proposed or analyzed at the project level in this program EIR at this time. Project-level review will be required for individual projects proposed within the Westside Community Plan area. However, the potential for significant impacts to historic resources exists both at the plan-wide level and as a result of the development of individual projects that could be allowed with implementation of the proposed Westside Redevelopment Plan. Because the project is the adoption of general plan amendments and a zoning code amendment, actions that would be permitted by the Westside Community Plan, if adopted, can be generally categorized as follows: redesignation of properties for different land uses; redefinition of density limits; and new construction, either requiring demolition of an existing building or construction adjacent to an existing building.

Redesignating properties for different land uses, redefining the density limits, or introducing new uses could allow for a project to be proposed that would demolish cultural resources and/or develop incompatible new construction adjacent to existing cultural resources, as well as contributors to an identified historic district. The demolition of a historical resource cannot be mitigated; therefore, site-specific environmental review would be required in order to examine alternatives.

Regarding new construction, the Westside Community Plan would utilize a form-based code, which is intended to encourage development that is compatible with the existing built environment. However, where new construction is adjacent to an existing historic resource, individual projects proposed after implementation of the proposed Westside Community Plan would be required to be reviewed for consistency with the *Secretary's Standards*.

Under *State CEQA Guidelines* Section 15064.5(b)(3), generally, 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 Buildings* (1992) or the *Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings* (1995), shall be considered as mitigated to a level of a less than significant impact on the historical resource.

As noted above, the proposed Westside Community Plan is designed, in part, to preserve and enhance Ventura's historic character. The actions in the Westside Community Plan require the scale of new buildings to be compatible with existing neighborhoods, and that the existing historically built character with regard to the increments of building, blocks, and neighborhoods that form the Westside Community be maintained.

The Westside Development Code contains approval requirements that state that each structure and land use shall be established, constructed, reconstructed, enlarged, altered, moved, or replaced in compliance with the approval requirements for the treatment of potential historic resources, as outlined in the Development Code. These approval requirements include requirements for evaluation of all proposals for development and requests for demolition to determine if the structure is over 40 years old and identified in the Westside Historic Context and Survey Report (provided in **Appendix 4.4**) as a potential resource.

As discussed above, conservation areas are not currently defined in the City's municipal code but are a concept recommended in the Westside Historic Survey Report. The Westside Community Plan area identifies four key underutilized sites available for public and private investment to stimulate additional investment in this community. These are discussed in more detail in **Section 3.0, Project Description**, and shown in **Figure 3.0-5, Economic Catalyst Sites**. The southwest portion of Catalyst Site #1 overlaps the northeast portion of the potential Ventura Avenue Industrial Conservation Area (See **Figure 4.4-3**). The catalyst site and potential changes to land use are briefly described below.

Catalyst Site #1, Selby site, Rocklite and Ventura Avenue: 15 acres for mixed-use development with commercial and residential uses.

The properties that are within both the potential Ventura Avenue Industrial Conservation Area and Catalyst Site #1 both include and are adjacent to properties that are considered to be historic contributors to the potential Conservation Area. The contributing properties are not considered historic resources for the purposes of CEQA.

The Development Code also contains a Historic District Overlay Zone that provides measures that ensure that future redevelopment or remodeling of property is conducted with respect to the context and form of potential future Historic Districts. The Overlay Zone also states that development proposals including additions or alterations on properties that are identified as contributors to historic districts (adopted or potential districts) shall incorporate a background assessment of properties to determine historic significance and shall be evaluated against the design recommendation of the historic district by the Historic Preservation Committee.

Specific development projects within the Westside Community Planning area will require project-level review to identify impacts to historic resources and to identify appropriate mitigation measures. Impacts related to historic resources would be less than significant with implementation of the policies and actions contained in the Westside Community Plan and Development Code, applicable General Plan policies, and the regulations contained in the Municipal Code, and no mitigation measures are required. Impacts to historic resources within the Westside Community Plan area would be Class III, Not Significant.

Westside Redevelopment Project Area

The project includes the adoption of the proposed Westside Redevelopment Area Plan. As discussed above, building standards for the proposed Westside Redevelopment Project area would be regulated by the Westside Community Development Code. No specific development projects are proposed or analyzed at the project level in this program EIR at this time. Project-level review will be required for individual projects proposed within the Westside Community Plan.

The portion of the Westside Redevelopment Project area located outside the Westside Community Plan area is located within the City's adopted Downtown Specific Plan Area. The Downtown Specific Plan and Development and Streetscape Plan contain policies and actions intended to protect and preserve identified and potential historic resources. The Final EIR prepared for the Downtown Specific Plan determined that implementation of the City of Ventura Historic Preservation Regulations, Historic Resource Design Guidelines within the Downtown Specific Plan Development Code, Historic District Overlay Zone regulations, 2005 General Plan Policies (9D) and Actions (9.16 - 9.19) in addition to Downtown Specific Plan Policies (1A) and actions (1.1 - 1.5) would address impacts to designated historic resources.¹¹ The EIR concluded that no additional mitigation was necessary.

Impacts related to historic resources within the Westside Redevelopment Project area would be less than significant with implementation of the policies and actions contained in the regulating documents for the Westside Community Plan, Downtown Specific Plan, applicable General Plan policies, and the regulations contained in the Municipal Code, and no mitigation measures are required. Impacts to historic resources within the Westside Redevelopment Project area would be Class III, Not Significant.

Mitigation Measures

No mitigation measures are required.

¹¹ City of Ventura, Downtown Specific Plan Final EIR, 2007.

Residual Impacts

Class III, Not Significant.

d. Cumulative Impacts

Impacts on historical resources tend to be site specific and are assessed on a site-by-site basis. Where resources in close proximity or with similar valued characteristics would be adversely affected, development within Westside Community Planning Project could represent an incremental adverse impact on historic resources. Specific projects proposed within the Westside Community Planning Project area would be required to undergo project-level review. Furthermore, individual development proposals within the Westside Community Planning area would be required to comply with the requirements of CEQA to ensure that potential impacts are mitigated to the extent feasible. With implementation of the Westside Community Plan and Development Code policies and actions, and Downtown Specific Plan policies and actions, applicable General Plan policies, and the regulations contained in the Municipal Code, cumulative impacts would be Class III, Not Significant. Therefore, the Westside Community Planning Project's contribution to cumulative impacts would not be cumulatively considerable, and cumulative impacts would be Class III, Not Significant.