

B. CULTURAL RESOURCES

This section describes existing cultural resources conditions in the project vicinity, identifies potentially significant impacts on such resources that may result from project implementation, and recommends mitigation measures to reduce the severity of significant impacts. The section summarizes the results of the Cultural Resources Study prepared for the project and included in Appendix C.¹

Cultural resources are sites, buildings, structures, objects, and districts that may have traditional or cultural value for their historical significance. Cultural resources include a broad range of resources, examples of which include archaeological sites, historic roadways and railroad tracks, and buildings of architectural significance. For a cultural resource to be considered a “historical resource,” it generally must be 50 years or older² and: 1) be listed in, or determined eligible for listing in, the California Register of Historical Resources by the State Historical Resources Commission; 2) be included in a local historical register of historical resources, as defined in section 5020.1(k) or identified as part of a survey meeting the requirements of section 5024.1(g) of the Public Resources Code; or 3) be determined by the lead agency as historically significant. Generally, a lead agency shall consider a resource to be historically significant if it meets the criteria for listing in the California Register of Historical Resources (*CEQA Guidelines* Section 15064.5(a)(3); see Regulatory and Legislative Context section below).

Under the California Environmental Quality Act (CEQA), paleontological resources are a subset of cultural resources and include fossil plants and animals, and evidence of past life such as trace fossils and tracks. Ancient marine sediments may contain invertebrate fossils representing snails, clam and oyster shells, sponges, and protozoa; and vertebrate fossils such as fish, whale, and sea lion bones. Terrestrial sediments may contain fossils that represent such vertebrate land mammals as mammoth, camel, saber tooth cat, horse, and bison.

1. Setting

This section describes the methods used to establish the baseline conditions for cultural resources in the project area; provides a brief historical overview of the project area; includes the State and local legislative regulatory context for cultural resources; and describes the cultural resources identified in the project site and their significance under CEQA.

a. Methods. The cultural resources analysis included archival records searches, a literature review, correspondence with a local historical society, and a field survey. This work was done to establish the baseline conditions for cultural resources in the project site and vicinity.

(1) Records Searches. Records searches were conducted to identify cultural resources within and adjacent to the project site. Records searches were conducted at the Northwest Information Center (NWIC) of the California Historical Resources Information System, Sonoma State University, Rohnert Park; the California Native American Heritage Commission (NAHC), Sacramento; and the

¹ LSA Associates, Inc., 2012. *A Cultural Resources Study for the Napa County Health and Human Services Agency Campus Project, Napa, Napa County, California*. August.

² California Office of Historic Preservation, 1999. *California Register and National Register: A Comparison (for purposes of determining eligibility for the California Register)*. Technical Assistance Series No. 6. California Department of Parks and Recreation, Sacramento.

University of California Museum of Paleontology (UCMP), Berkeley. The NWIC, an affiliate of the State of California Office of Historic Preservation, is the official state repository of cultural resources records and reports for Napa County. The NAHC maintains the Sacred Lands File, which includes the locations of sites with cultural significance to Native American groups. The UCMP's database includes information on locations where fossils have been identified, the taxa of fossils found at a particular location, and the geological formations associated with a fossil locality.

As part of the records search, LSA also reviewed the following State and local inventories for cultural resources in and adjacent to the project area:

- *California Inventory of Historic Resources*;³
- *California Historical Landmarks*;⁴
- *California Points of Historical Interest*;⁵
- *Five Views: An Ethnic Historic Site Survey for California*;⁶
- *Directory of Properties in the Historic Property Data File*.⁷ The directory includes the listings of the National Register of Historic Places, National Historic Landmarks, the California Register of Historical Resources, California Historical Landmarks, and California Points of Historical Interest; and
- *City of Napa Combined Historic Resources List*. This inventory lists Landmark Properties, Landmark Districts, Neighborhood Conservation properties, and Historic Resource Inventory Properties.⁸

Records Search Results. The records search of the NWIC database identified P-28-000820/CA-NAP-915H within the project site. As recorded by historian Bright Eastman,⁹ this cultural resource consists of three elements:¹⁰ the Napa County Infirmary Crescent Buildings, the Napa County Infirmary Ancillary Buildings, and the Napa County Infirmary Archaeological Site. Each element is described below.

- *Napa County Infirmary Crescent Buildings*.¹¹ The Crescent Buildings consist of three stucco-clad buildings with Mission Revival and vernacular Prairie style influences. These buildings, described

³ California Department of Parks and Recreation, 1976. *California Inventory of Historic Resources*. California Department of Parks and Recreation, Sacramento.

⁴ California Office of Historic Preservation, 1996. *California Historical Landmarks*. California Department of Parks and Recreation, Sacramento.

⁵ California Office of Historic Preservation, 1992. *California Points of Historical Interest*. California Department of Parks and Recreation, Sacramento.

⁶ California Office of Historic Preservation, 1988. *Five Views: An Ethnic Historic Site Survey for California*.

⁷ California Office of Historic Preservation, 2011. California Department of Parks and Recreation, Sacramento.

⁸ Napa, City of, 2000. Napa Planning Department. *City of Napa Combined Historic Resources List*.

⁹ Eastman, Bright, 1997. California Department of Parks and Recreation form DPR 523 records for P-28-000820/CA-NAP-915H. On file at the Northwest Information Center, Sonoma State University, Rohnert Park, California.

¹⁰ Field designations by Eastman.

¹¹ The crescent-shaped driveway and lawn area which is further described throughout this report as part of the Napa County Infirmary District is not included in Eastman's recordation of the resource.

from west to east, include: Building A, which currently houses mental health administration for the campus; the centrally-located Building B, which includes out-patient therapy and a kitchen/dining area; and Building C, which provides treatment authorization services. The buildings face Old Sonoma Road and are aligned along a crescent-shaped driveway that serves as the main entrance to the HHS campus. All three of these buildings were designed and constructed in 1910-1912 and have undergone numerous interior and exterior alterations both prior and subsequent to Eastman's recordation of the buildings in 1997. Eastman concluded that the Crescent Buildings are eligible for listing in the National Register under Criterion C (see the Legislative and Regulatory Context section below for details about the eligibility evaluation process).

- *Napa County Infirmary Ancillary Buildings.* As described by Eastman, the Ancillary Buildings consisted of an 1890 hay barn, a circa 1900 maintenance building, a circa 1880s Italianate cottage, and a circa 1900 work shop. These resources are no longer extant on campus; the barn—and possibly the cottage—were relocated to a property on Hagen Road east of the City of Napa prior to extensive campus renovations that occurred in the late-1990s.
- *Napa County Infirmary Archaeological Site.* The Archaeological Site consists of a 17-foot by 16-foot, roughly circular feature consisting of inverted stoneware ale bottles; two 16-foot by 11-foot, 6-inch and 24-foot by 25-foot cement structure pads; a dry-laid stone-lined small pond measuring 11 feet, 6-inches long and 4 feet by 6 feet, 6-inch wide with a walkway alongside it; a small rectangular pumphouse; and a 8-foot by 8-foot raised concrete foundation.

The circular stoneware ale bottle feature, which was identified beneath six to nine inches of soil during construction of a generator room, comprises bottles dating from approximately 1850 to 1910. The age of the feature, however, does not necessarily date from the age of the bottles, but was estimated “to have been in place for at least 50-60 years.”¹² The ages of the surface features were not determined.

Eastman noted that the Archaeological Site “. . . does not appear to have historical significance or important information for research” and is, therefore, not eligible for listing in the National Register. The stoneware ale bottle feature, however, was only partially exposed, and other portions of this feature – or similar historical subsurface features on campus – could have historical significance.

The City of Napa assigned a Historic Resources Inventory rating of “2” to the HHS campus. A “2” rating indicates a resource that “appears individually eligible for designation as a City Landmark, already is listed or has been previously determined eligible for listing.”¹³

Ms. Katy Sanchez, NAHC Program Analyst, in a fax dated June 23, 2011, informed LSA that a review of the Sacred Lands File “failed to indicate the presence of Native American cultural resources in the immediate project area.”

A fossil locality search conducted on June 17, 2011, by Dr. Pat Holroyd of the UCMP indicated that no recorded fossils are present in the project area or a two-mile radius.

¹² Eastman, Bright, 1997, op. cit.

¹³ Napa, City of, 2000, op. cit.

(2) **Literature Review.** LSA reviewed publications and maps for archaeological, historical, ethnographic, and paleontological information about the project area and its vicinity. The literature review included aerial photographs, county survey maps, General Land Office plats, Sanborn Fire Insurance Company maps, historical U.S. Geological Survey topographic quadrangle maps, and previously published information by Eastman. The results of the literature review are discussed in the Cultural Resources Study prepared for the project and included in Appendix C and are summarized below.

Literature Review Results. No prehistoric archaeological or ethnographic sites within the project area were identified by the literature review.

The literature review indicates that the project area was predominately rural agricultural, with initial development of the project site occurring in 1869. In 1868, the Napa County Board of Supervisors established a County Infirmary (now the HHSA campus). The 1869 *Map of Napa City and Additions*¹⁴ depicts a road labeled “County Road to SONOMA” with an unlabeled dashed-lined, rectangular-shaped box at the southwestern corner of a plot of land owned by “C. Harston.” This rectangular-shaped figure roughly corresponds with the County Infirmary parcel, although no buildings are depicted on this map. The first County Infirmary buildings were constructed in 1869 by contractor Beeby, Robinson & Son and included a hospital building and outbuildings for the infirmary’s farm. The circa 1880 *Birdseye View of Napa City, California*¹⁵ depicts the newly constructed “County Hospital” situated in sparsely settled surroundings. This 1880s depiction shows a main, two-story, end-gabled roofed building fronting a tree-lined crescent-shaped driveway, with a small one-story end-gabled roofed building and a water tower situated to the rear of the main building.

Sanborn Fire Insurance Maps from the first half of the twentieth century depict the “Napa Co. Infirmary” (current HHSA campus). The 1924 *Napa, California* Sanborn Map depicts elements of the present HHSA campus built environment. Other built environment elements shown on the 1924 Sanborn Map include a cottage; a garage behind the main central building (Building B); a small, rectangular laundry facility approximately 45-feet west of the garage; a tank house; and a single-room building to the east of the garage, perhaps the location of a detention cell.

The 1949 *Napa, California* Sanborn map depicts all three of the buildings comprising the HHSA campus historic district (see Project Site Cultural Resources section below). The previous central building, as depicted in the 1901, 1910, and 1924 Sanborn maps, has been either demolished or redesigned to its current form.¹⁶ At this time, the central building (Building B) includes a “Dining Room” and detention cells at the rear of the building. A covered walkway connects the central building and Building C to the east. A tankhouse is still depicted. The single-room building noted on the 1924 Sanborn is no longer depicted.

¹⁴ Pierce, William, 1869. *Map of Napa City and Additions*. On file at Napa County Historical Society, Folder 69A: 2008.102.141 (Birds Eye View Folder), Napa, California.

¹⁵ Dyer, C.J., 1880. *Birdseye View of Napa City California, Looking West*. Electronic document, www.oac.cdlib.org/ark:/13030/tf6f59p4zc/?brand=oac4 (accessed July 18, 2011). Online Archive of California.

¹⁶ Eastman’s research did not indicate that the central Building B was demolished. It is possible this building’s footprint was expanded in 1936, when interior remodeling of buildings A and C occurred and a connecting annex between the central infirmary buildings was constructed.

(3) Consultation. On June 16, 2011, and June 30, 2011, LSA sent letters or e-mail communications describing the project and maps depicting the project area to local historical organizations and potentially interested parties requesting information regarding the HHS campus and possible concerns regarding the project. Responses are summarized below.

- *Napa County Historical Society.* On July 14, 2011, LSA made a follow-up telephone call and left a voicemail message asking the Society to contact LSA with any information or concerns regarding cultural resources within the project site. No response has been received to date.
- *Napa County Landmarks.* Kara Brunzell, Program Director, in an email to LSA dated June 17, 2011, desired that Napa County Landmarks be included on future consultation lists for projects in Napa County. Regarding the findings of Eastman, Ms. Brunzell indicated that Napa County Landmarks “strongly concurs with this finding, and we advocate for the retention of the buildings. Landmarks believe that an architect skilled in adaptive restorations will be able to design a campus that meets twenty-first century needs while retaining these historically significant buildings.”
- *Napa Valley Museum.* On July 14, 2011, LSA made a follow-up telephone call and spoke to a Museum staff member. LSA left a telephone number and project information with the staff member to forward to a supervisor who would contact LSA if the Museum has any information or concerns regarding cultural resources within the project site. No response has been received to date.
- *Councilmember Juliana Inman.* During a July 11, 2011, telephone conversation, Councilmember Inman stated that the three buildings lining the HHS campus crescent-shaped driveway are significant and retain integrity despite the installation of replacement vinyl windows. Councilmember Inman stated her preference that the three buildings should remain intact at their original location and be incorporated appropriately into future HHS campus design plans. Councilmember Inman also expressed a desire to be included in future consultation regarding the project.
- *Preservation Napa Valley Director Wendy Ward.* On June 30, 2011, Ms. Ward replied via email that she would place a telephone call to LSA to discuss the project. On July 11, 2011, LSA made a follow-up telephone call and left a voicemail message asking Ms. Ward to contact LSA with any information or concerns regarding cultural resources within the project site. During a July 14, 2011, telephone conversation, Ms. Ward indicated her desire to see the existing three buildings incorporated in future design plans for the campus and to be included in future consultation regarding the project.

(4) Field Survey. An LSA architectural historian and archaeologist conducted a field survey of the project site on July 1, 2011, to assess the current condition of built environment resources identified by Eastman in 1997 and identify surface indications of archaeological deposits.

The field survey identified changes to Buildings A, B, and C since Eastman’s 1997 record. Nearly all the original windows have been replaced with vinyl-sashed, double-hung “energy-saving” windows. Additional alterations included new access doors on the north facades of Buildings A, B, and C and partially-filled door frames at the main entrances, a metal equipment screen atop the roof peak of Building B, a plywood-enclosed electrical generator room with electrical equipment atop a concrete pad on the eastern façade of Building B, and the removal of the arched colonnade walkway between buildings B and C. However, despite these alterations, the buildings, when considered as a district, still retain the overall crescent-shaped spatial arrangement and architect William Corlett’s design.

Most of the project area is developed with buildings, landscaping, and hardscape features, which now obscure much of the native ground surface. The archaeological survey, therefore, was confined to those areas where soils were exposed. No surface indications of archaeological deposits were found. The location of the stoneware ale bottle feature identified by Eastman is now occupied by a generator room.

b. Cultural Resources Overview. This subsection briefly describes the prehistory and ethnography, history, and paleontology of the project site vicinity as determined by the records searches and literature review described above.

(1) Prehistory and Ethnography. The Paleo-Archaic-Emergent cultural sequence developed by Fredrickson¹⁷ is commonly used to interpret the prehistoric occupation of Central California, including Napa Valley. The sequence is broken into three broad periods: the Paleoindian Period (12,000–8000 B.P.); the three-staged Archaic Period, consisting of the Lower Archaic (8000–5000 B.P.), Middle Archaic (5000–3000 B.P.), and Upper Archaic (3000–1500 B.P.); and the Emergent Period (1500–200 B.P.).

The Paleoindian Period began with the first entry of people into California. These people probably subsisted mainly on big game, minimally processed plant foods, and had no known trade networks. The Archaic Period is characterized by increased use of plant foods, elaboration of burial and grave goods, and increasingly complex trade networks.¹⁸ The Emergent Period is marked by an increase in cultural complexity as demonstrated through finely wrought materials, such as new *Olivella* bead types and an array of multi-perforated and bar-scored *Haliotis* ornaments. The first arrow-sized projectile points in the Bay Area did not appear until after A.D. 1250. An increase in the complexity of social stratification is demonstrated through a change in mortuary practices.¹⁹ These changes in mortuary patterns reflect a new regional ceremonial system that was the precursor of the ethnographic Kuksu cult, a ceremonial system that unified the many language groups around the Bay.

Ethnographically, the project site is in former Patwin (Southern Wintun) territory. The territory of the Patwin included the Sacramento Valley west of the Sutter Buttes and the Coast Ranges east of Clear Lake; from the present location of the town of Stonyford in the north to Suisun Bay in the south, including the southern portion of Napa Valley. The ethnographic villages of *Tcimenukme*,²⁰ *Napato*, and *Tulukai*²¹ were in the vicinity of the City of Napa.

¹⁷ Fredrickson, David A., 1974. Cultural Diversity in Early Central California: A View from the North Coast Ranges. *Journal of California Anthropology* 1(1):41-53.

¹⁸ Bennyhoff, James A., and David A. Fredrickson, 1994. A Proposed Integrative Taxonomic Systems for Central California Archaeology. In *Toward A New Taxonomic Framework for Central California Archaeology: Essays by James A. Bennyhoff and David A. Fredrickson*, edited by Richard E. Hughes, pp. 15-24. Contributions of the University of California Archaeological Research Facility 52, Berkeley.

¹⁹ Milliken, Randall, et al., 2007. Punctuated Culture Change in the San Francisco Bay Area. In *California Prehistory*, edited by Terry L. Jones and Kathryn A Klar. Rowman and Littlefield Publishers, Inc, Lanham, Maryland.

²⁰ Kroeber, Alfred, 1925. *Handbook of the Indians of California*. Bureau of American Ethnology Bulletin 78. Plate 34 Smithsonian Institution, Washington, D.C. Reprinted 1976 by Dover Publications, New York.

²¹ Johnson, Patti, 1978. Patwin. In *California*, edited by Robert F. Heizer, pp. 350-360. Handbook of North American Indians, vol. 8, William J. Sturtevant, general editor. Smithsonian Institution, Washington, D.C.

The Patwin lived in semi-permanent settlements on streams and river drainages. Villages consisted of several houses occupied by one or more families. Their settlement system also included temporary summer camps, quarries, ceremonial grounds, fishing stations, and cemeteries. The Patwin practiced a hunting and gathering-based economy, which relied heavily on acorns, local game, and fish for subsistence.

The material cultural of the Patwin is similar to that of surrounding groups. Stone tools included knives, projectile points, arrow straighteners, scrapers, pestles, mortars, and pipes. The raw material for these tools included basalt, steatite, chert, and obsidian. Shells were manufactured into shell-bead money using a pump drill. Willow, sedge root, and redbud were preferred materials for weaving baskets. Baskets were used for food collection, storage, and preparation, in addition to cradles, and for burial accompaniments.²²

The lifeways of the Patwin in the Napa Valley were drastically changed in the mid-nineteenth century with the establishment of Spanish missions near their territory. When European settlers moved into northern California they exposed the Patwin to diseases to which they had no immunity. Studies of mission records indicate that Patwin from the Napa Valley area were moved to Mission San Francisco between 1809 and 1815, and Mission San Jose between 1814 and 1818.²³ Following the secularization of the missions in 1834, many Patwins lived on reservations established by the United States Government or worked on ranches for white land owners.

(2) Project Vicinity History.²⁴ In accordance with an Act passed by the California State Legislature on April 18, 1867, the Napa County Board of Supervisors ordered that a county infirmary be established in 1868. Before 1869, the county's poor and indigent sick were cared for in a smaller building somewhere near the present HHSA facility. As the population of Napa County grew, however, larger hospital accommodations were needed. The first infirmary buildings were erected in 1869 by Beeby, Robinson & Son. New buildings included a main hospital building, outbuildings for the infirmary farm, and other support facilities.

The early infirmary had, on average, 12 to 15 patients, mostly men of Anglo-American, Irish, and German background with a few African American and Native American patients. Physicians at the infirmary earned \$600-\$1,000 per year; the Superintendent made between \$900-\$1,440. The main infirmary building was 2.5 stories in height and could accommodate 20 people in four sleeping rooms on the second floor, with a dining room, kitchen, parlor, and two additional sleeping rooms on the first floor. The Board of Supervisors contracted with outside suppliers for bedding, food, and other necessary medical supplies. Hay and some food crops were cultivated on surrounding acreage by able-bodied inmates. Milk cows were also kept in the area to provide the facility with fresh dairy products. There were two meals per day: breakfast at 8:00 a.m. and dinner at 3:00 p.m. A small lunch was served between the main meals.

Additions to the infirmary were made by prominent Napa architect Luther Turton during the 1890s. Corlett & Sons, which included William H. Corlett and his brother Robert, owned and operated a

²² Ibid.

²³ Milliken, Randall, 1995. *A Time of Little Choice: The Disintegration of Tribal Culture in the San Francisco Bay Area 1769-1810*, p. 248. Ballena Press, Menlo Park, California.

²⁴ Information in this section is adapted from Eastman's (1997) survey and evaluation of the HHSA campus.

planing mill in Napa, and were the project contractors. One of these additions included detention cells at the rear of the main infirmary building that temporarily housed mentally ill patients.

In 1910, the infirmary complex was dominated by the 2.5-story main infirmary building (the present day eastern portion of Building B) that had two smaller one-story additions on its east facade. A one-story, front-gabled hospital building constructed of stone was situated near the west side of the infirmary building (the present day western portion of Building B). Two reinforced concrete dormitories flanked the main infirmary and adjoining hospital on the east and west, facing Old Sonoma Road. Ancillary buildings included a small Italianate cottage for Superintendent's housing, a carpenter's shop, a 1.5-story hay barn, and a laundry facility.

In October 1910, the Board of Supervisors ordered the construction of a new infirmary, with the cost not to exceed \$35,000. Napa architects Luther Turton and William H. Corlett were among the architects who submitted plans for the new facility. Plans submitted by Corlett were ultimately selected. In 1912, Corlett drew up plans for a redesign of the then existing 2.5-story main infirmary building (Building B) and construction of the two new dormitories (Buildings A and C), which he did for \$7,500; these buildings were constructed by E.W. Doughy for \$13,399. Construction of the new dormitories was completed by December 1912. The new buildings featured a hybrid of two then-popular, architectural styles: Mission Revival and Prairie School. These buildings were designed with an overall low height, and their interior spaces were well ventilated and bright with many windows. Mission Revival features include the use of textured stucco to simulate adobe, arches, a porch parapet, and a Spanish styled colonnade. The roof was sheathed in stamped metal made to resemble Mission tiles. Balancing the Spanish Revival flavor, Corlett incorporated Prairie School details such as carved decorative rafter ends under wide, overhanging eaves, and multi-paned, double-hung wooden casement windows. Interior arrangements included wards, nurses' stations, bed rooms, sitting rooms, rear porches, and front verandas.

By the 1930s, the infirmary was in need of modernization, and building alterations were undertaken in 1936. Renovation plans for the cottages included the installation of new plumbing and lavatory fixtures. Also added to Buildings A and C were concrete steps to the front and rear and sun rooms. A connecting annex between the central infirmary building and the stone hospital comprising Building B was also constructed. The new annex would contain a corridor, four detention cells, a room and lavatory. The county infirmary was operated as a convalescent hospital for the low income and elderly until converted for use as an alcohol and drug detoxification and rehabilitation center in 1973.

The Napa County HHSA was formed in 1993 when the Board of Supervisors merged the Public Health Department with the Human Services Delivery System.

(3) Paleontology. Geologically, the project area is underlain by the Quaternary Pleistocene (1,800,000 years B.P. to 10,000 years B.P.) alluvial deposits laid down by the Napa River. Erosion of the Mesozoic (246,000,000 to 65,000,000 years B.P.) Great Valley Formation and the Pliocene (53,000,000 to 1,800,000 years B.P.) Sonoma Volcanics, both of which comprise much of the uplands to the west and east of the project site, and the subsequent fluvial transportation of the sediment also resulted in the deposition of alluvium in the Napa Valley area. The geologic formations, from youngest to oldest, are described below.

Quaternary Deposits. Quaternary Pleistocene (1,800,000 years B.P. to 10,000 years B.P.) deposits in Napa Valley largely consist of loosely consolidated sand and gravel deposited in fluvial systems. Older Pleistocene deposits typically occur as terraces incised by Holocene fluvial drainages. Pleistocene alluvium can contain invertebrate and extinct vertebrate fossils, many of which are representative of the Rancholabrean land mammal age. Fossils in alluvium of this age include, but are not limited to, bison, mammoth, ground sloths, saber-toothed cats, dire wolves, horses, cave bears, rodents, birds, reptiles, and amphibians.^{25, 26, 27}

Sonoma Volcanics. Underlying the Quaternary alluvium, at an unknown depth, is a sequence of Pliocene Sonoma Volcanic andesitic tuff. Andesitic tuff may contain invertebrate and extinct vertebrate fossils representative of the Hemphillian (9,000,000 to 4,750,000 years B.P.) and Blancan (4,750,000 to 1,800,000 years B.P.) land mammal ages.

Great Valley Sequence. Underlying the Pliocene Sonoma Volcanics at an unknown depth is a sequence of Upper Jurassic (161,000,000 to 144,000,000 years B.P.) and Lower Cretaceous (144,000,000 to 100,000,000 years B.P.) marine sedimentary rock including marine mudstone, sandstone, and conglomerate. The Great Valley Sequence may contain vertebrate and invertebrate marine fossils representative of the Cretaceous (144,000,000 to 65,000,000 years B.P.).

c. Regulatory and Legislative Context. The following describes federal, State and local regulatory and policy requirements for cultural resources.

(1) Section 106 Consultation. Section 106 of the National Historic Preservation Act of 1966, as amended (Section 106), details requirements for actions that are undertaken, permitted, licensed, or funded by the federal government. Part of the requirements of Section 106 involve “taking into account” the potential that a given undertaking will affect historic properties, which are sites, buildings, structures, objects, or districts that are listed in, or eligible for listing in, the National Register of Historic Places. Detailed regulations that govern the Section 106 process are provided in 36 CFR Part 800, and include specific requirements for consultation with tribal and historical organizations, as well as other members of the public, regarding the potential of the project to affect historic properties.

Because the project would not receive federal funding or require a permit or license issued by a federal agency, it is not subject to Section 106.

(2) CEQA Requirements. CEQA defines a “historical resource” as a resource that is: 1) listed in, or determined eligible for listing, in the California Register of Historical Resources (California Register); 2) listed in a local register of historical resources as defined in Public Resources Code (PRC) Section 5020.1(k); 3) identified as significant in a historical resource survey meeting the

²⁵ Helley, E.J., et al., 1979. *Flatland Deposits of the San Francisco Bay Region - their geology and engineering properties, and their importance to comprehensive planning*. Geological Survey Professional Paper 943. U.S. Geological Survey and Department of Housing and Urban Development, Washington, D.C.

²⁶ Hertlein, Leo G., 1951. Invertebrate Fossils and Fossil Localities. In *Geologic Guidebook of the San Francisco Bay Counties: History, Landscape, Geology, Fossils, Minerals, Industry, and Routes to Travel*, prepared by Olaf P. Jenkins, pp. 187-192. Bulletin 154. State of California Division of Mines, San Francisco.

²⁷ Stirton, R.A., 1951. Prehistoric Land Mammals of the San Francisco Bay Region. In *Geology Guidebook of the San Francisco Bay Counties: History, Landscape, Geology, Fossils, Minerals, Industry, and Routes to Travel*, prepared by Olaf P. Jenkins, pp. 177-186. Bulletin 154. State Division of Mines, San Francisco.

requirements of PRC Section 5024.1(g); or 4) determined to be a historical resource by a project's lead agency (Public Resources Code Section 21084.1 and *CEQA Guidelines* Section 15064.5(a)). A historical resource consists of:

“Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California.... Generally, a resource shall be considered by the lead agency to be ‘historically significant’ if the resource meets the criteria for listing on the California Register of Historical Resources” *CEQA Guidelines* Section 15064.5(a)(3).

In accordance with *CEQA Guidelines* Section 15064.5(b), a substantial adverse change in the significance of a historical resource is a significant effect on the environment. Significant impacts under CEQA require that specific, feasible mitigation measures be developed to improve adverse environmental conditions.

CEQA requires a lead agency to determine if an archaeological cultural resource meets the definition of a historical resource, a unique archaeological resource, or neither (*CEQA Guidelines* Section 15064.5(c)). Prior to considering potential impacts, the lead agency must determine whether an archaeological cultural resource meets the definition of a historical resource in *CEQA Guidelines* Section 15064.5(c)(1). If the archaeological cultural resource meets the definition of a historical resource, then it is treated like any other type of historical resource in accordance with *CEQA Guidelines* Section 15126.4. If the archaeological cultural resource does not meet the definition of a historical resource, then the lead agency determines if it meets the definition of a unique archaeological resource as defined at CEQA Section 21083.2(g). In practice, however, most archaeological sites that meet the definition of a unique archaeological resource will also meet the definition of a historical resource.²⁸ Should the archaeological cultural resource meet the definition of a unique archaeological resource, then it must be treated in accordance with CEQA Section 21083.2. If the archaeological cultural resource does not meet the definition of a historical resource or an archaeological resource, then effects to the resource are not considered significant effects on the environment (*CEQA Guidelines* Section 15064.5(c)(4)).

(3) Public Resources Code 5024.1: California Register of Historical Resources. Section 5024.1 of the PRC established the California Register. Generally, a resource is considered by the lead agency to be ‘historically significant’ if the resource meets the criteria for listing on the California Register (CCR Title 14(3) § 15064.5(a)(3)). For a cultural resource to qualify for listing in the California Register it must be significant under one or more of the following criteria:

- Criterion 1:* Associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
- Criterion 2:* Associated with the lives of persons important in our past;
- Criterion 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

²⁸ Bass, Ronald E., Albert I. Herson, and Kenneth M. Bogdan, 1999. *CEQA Deskbook: A Step-by-Step Guide on How to Comply with the California Environmental Quality Act*, p. 105. Solano Press Books, Point Arena, California.

Criterion 4: Has yielded, or may be likely to yield, information important in prehistory or history.

In addition to being significant under one or more of these criteria, a resource must retain enough of its historic character and appearance to be recognizable as an historical resource and be able to convey the reasons for its significance (CCR Title 14 Section 4852(c)). Generally, a cultural resource must be 50 years or older to be eligible for the California Register.

(4) National Register of Historic Places. The National Register of Historic Places (National Register) is the nation's official list of districts, sites, buildings, structures, and objects that are significant in American cultural, history, engineering, archaeology, or architecture. An historic property is any district, site, building, structure, or object listed in or eligible for listing in the National Register at the local, state, or national level (36 CFR §800.16(1)(1)). The eligibility requirements of the California Register and the National Register are nearly identical. A property that is eligible for the National Register is considered eligible for the California Register and, in general, properties that are considered eligible for the California Register will also be eligible for the National Register.

The criteria for determining a resource's eligibility for National Register listing are defined at 36 CFR §60.4 and are as follows:

Criterion A: That are associated with events that have made a significant contribution to the broad patterns of our history; or

Criterion B: That are associated with the lives of persons significant in our past; or

Criterion C: That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

Criterion D: That have yielded, or may be likely to yield, information important in prehistory or history.

Evaluating a resource's eligibility for listing in the National Register also takes into account the property's age, period of significance, historic context, significance, and integrity. Seven aspects of integrity are considered when evaluating a resource's eligibility for the National Register:

- *Location* is the place where the historic property was constructed or the place where the historic event occurred. The actual location of a historic property, complemented by its setting, is particularly important in recapturing the sense of historic events and persons.
- *Design* is the combination of elements that create the form, plan, space, structure, and style of a property. Design includes such elements as organization of space, proportion, scale, technology, ornamentation, and materials.
- *Setting* is the physical environment of a historic property. Setting refers to the character of the place in which the property played its historical role. Physical features that constitute the setting of a historic property can be either natural or manmade, including topographic features, vegetation, paths or fences, or relationships between buildings and other features or open space.
- *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. It is the evidence of the artisan's labor and skill in constructing or altering a building, structure, object, or site.
- *Feeling* is a property's expression of the aesthetic or historic sense of a particular period of time. It results from the presence of physical features that, taken together, convey the property's historic character.
- *Association* is the direct link between an important historic event or person and a historic property.

Resources that are 50 years old or older, are significant under one or more criterion, and possess integrity will generally be considered eligible for listing in the National Register.

(5) Health and Safety Code Section 7050.5: Human Remains. The California Health and Safety Code (HSC) Section 7050.5 states that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the remains are discovered has determined whether or not the remains are subject to the coroner's authority. If the human remains are of Native American origin, the Coroner must notify the Native American Heritage Commission within 24 hours of this identification. The Native American Heritage Commission will identify a Native American Most Likely Descendant (MLD) to inspect the site and provide recommendations for the proper treatment of the remains and associated grave goods.

(6) Public Resources Code Section 5097.5: Cultural and Paleontological Resources. California Public Resources Code (PRC) Section 5097.5 provides for the protection of cultural and paleontological resources. This PRC section prohibits the removal, destruction, injury, or defacement of archaeological and paleontological features on any lands under the jurisdiction of State or local authorities.

(7) County of Napa. The County has adopted provisions in its Municipal Code (Code) and in its General Plan that address cultural resources. Sections from the County's Code and General Plan that are relevant to the current project are summarized below.

Municipal Code. Cultural resources are addressed in the Landmark Preservation chapter (Chapter 15.52) of the County's Code. This chapter, in part, grants administrative authority to the Conservation, Development, and Planning Commission (Commission) to review applications for landmark status, maintain a list of designated County landmarks, conduct public hearings on environmental documents prepared for demolition of designated landmarks, and to "perform other functions related to the cultural resources of the county as may be delegated to it by the board of supervisors."

The Commission may designate a landmark building after being requested to do so by the property owner and after conducting a public hearing on the proposed designation. For a building to qualify as a County landmark, the Commission must find that it has "special historical, architectural, cultural, aesthetic or engineering interest or value of a historical nature." The criteria for a resource to be designated a County landmark include those that are similar to the California and National Registers.

The resource must be at least 50 years old and meet one or more of the following criteria to be designated a County landmark:

- 1) Its character, interest or value as a part of the local, regional, state or national history, heritage or culture:
 - a) Its location as a site of a significant historical event;
 - b) Its identification with a person who significantly contributed to the local, regional, state or national history and culture;
 - c) Its exemplification of the cultural, economic, social or historical heritage of the county;
- 2) Its architectural significance at the local, state, or national level:
 - a) Its embodiment of distinctive architectural characteristics of a style, type or period;
 - b) Its identification as the work of an architect, builder or designer whose work has influenced the development of the county;
 - c) Its embodiment of elements of architectural or engineering design, detail, materials, or craftsmanship which represent a significant innovation or which are unique;
- 3) Its relationship to any other landmark, if its preservation is essential to the integrity of that landmark;
- 4) Its potential for yielding archaeological information.

General Plan. The Community Character element of the County's General Plan includes goals, policies, and actions to preserve and protect the cultural resources in the county.

Goal CC-4. Identify and preserve Napa County's irreplaceable cultural and historic resources for present and future generations to appreciate and enjoy

Goal CC-5. Encourage the reuse of historic buildings by providing incentives for their rehabilitation and reuse.

- Policy CC-17: Significant cultural resources are sites that are listed in or eligible for listing in either the National Register or the California Register due to their potential to yield new information regarding prehistoric or historic people and events or due to their intrinsic or traditional cultural value.
- Policy CC-18: Significant historical resources are buildings, structures, districts, and cultural landscapes that are designated Napa County Landmarks or listed in or eligible for listing in either the National Register or the California Register. Owner consent is a prerequisite for designation as a County Landmark.
- Policy CC-19: The County supports the identification and preservation of resources from the County's historic and prehistoric periods.
- Policy CC-23: The County supports continued research into and documentation of the county's history and prehistory, and shall protect significant cultural resources from inadvertent damage during grading, excavation, and construction activities.
 - Action Item CC-23.1: In areas identified in the Baseline Data Report as having a significant potential for containing significant archaeological resources, require completion of an archival study and, if warranted by the archival study, a detailed on-site survey or other work as part of the environmental review process for discretionary projects.

- Action Item CC-23.2: Impose the following conditions on all discretionary project in areas which do not have a significant potential for containing archaeological or paleontological resources:

“The Planning Department shall be notified immediately if any prehistoric, archaeologic, or paleontologic artifact is uncovered during construction. All construction must stop and an archaeologist meeting the Secretary of the Interior’s Professional Qualifications Standards in prehistoric or historical archaeology shall be retained to evaluate the finds and recommend appropriate action.”

“All construction must stop if any human remains are uncovered, and the County Coroner must be notified according to Section 7050.5 of California’s Health and Safety Code. If the remains are determined to be Native American, the procedures outlined in CEQA Section 15064.5(d) and (e) shall be followed.”

- **Policy CC-26:** Projects which follow the Secretary of the Interior’s Standards for Preservation Projects shall be considered to have mitigated their impacts on the historic resource.
- **Policy CC-27:** When discretionary project involve potential historic architectural resources, the County shall require an evaluation of the eligibility of the potential resources for inclusion in the National Register and California Register by a qualified architectural historian. When historic architectural resources that are either listed in or determined eligible for inclusion in the National Register or the California Register are proposed for demolition or modification, the County shall require an evaluation of the proposal by a qualified preservation architect to determine whether it complies with the Secretary of the Interior’s Standards for Preservation Projects. In the event that the proposal is determined not to comply with the Secretary of the Interior’s Standards, the preservation architect shall recommend modifications to the project design for consideration by the County and for consideration and possible implementation by the project proponent. These recommendations may include modification of the design, re-use of the structure, or avoidance of the structure.
- **Policy CC-27:** Offer incentives for the appropriate rehabilitation and reuse of historic buildings and disseminate information regarding incentives available at the state and federal level. Such incentives shall include but are not limited to the following:
 - Apply the State Historical Building Code (SHBC) when building modifications are proposed.
 - Reduce County building permit fees when qualified preservation professionals are retained by applicants to verify conformance the SHBC and the Secretary of the Interior’s Standards.
 - Use of the federal historic preservation tax credit for qualified rehabilitation projects.
 - Income tax deduction for qualified donations of historic preservation easements.
- **Policy CC-30:** Because the County encourages preservation of historic buildings and structures in place and those buildings and structures must retain integrity to be considered historically significant, the County shall discourage scavenging of materials from pre-1920 walls and other structures unless they are beyond repair.

(8) City of Napa Historic Resources Inventory. The Historic Resources Inventory (HRI) is the City of Napa’s official list of locally-designated historic resources. The current HRI was adopted in 1997 by the City Council and regulated via the City of Napa Historic Preservation and Neighborhood Conservation Ordinance (Ordinance) (City of Napa Municipal Code §15.52.010), which outlines the preservation and conservation concepts embodied in the policies outlined in the City’s General Plan. Although the HHSA, as a County facility, is not encumbered by the City ordinance and register, the resource documentation contained in the HRI may be helpful to establish the status of the resource under CEQA.

Over 2,800 properties are listed in the current HRI, including the County Infirmity within the project site. Properties listed in HRI are classified as either Landmarks, Neighborhood Conservation Properties, or as “significant.” Buildings on the inventory are eligible for use of the State Historical Building Code.

The Ordinance (City of Napa Municipal Code §15.52.040(B)(1)) outlines the specific criteria referred to by the City Council for designation of a cultural resource as a *Landmark Property*. These criteria are:

- a. Exemplifies or reflects special elements of the city’s cultural, social, economic, political, aesthetic, engineering, architectural or natural history; or
- b. Is identified with persons or events significant in local, state, or national history; or
- c. Embodies distinctive characteristics of a style, type, period or method of construction, or is a valuable example of the use of indigenous materials or craftsmanship; or
- d. Represents the work of a notable builder, designer or architect; or
- e. Is one of the few remaining examples in the city, region, state or nation possessing distinguishing characteristics of an architectural or historical type of specimen.

The Ordinance (City of Napa Municipal Code §15.52.040(B)(2)) outlines the specific criteria referred to by the City Council for designation of a cultural resource as a *Landmark District*. These criteria are:

- a. The majority of the properties reflect significant geographical patterns, including those associated with different eras of settlement and growth, particular transportation modes or distinctive examples of park or community planning; or
- b. The majority of the properties convey a sense of historic or architectural cohesiveness through their design, setting, materials, workmanship, or association; or
- c. The majority of the properties have historic significance and retain a high degree of integrity; or
- d. The area in general is associated with a historically significant period in the development of the community or is associated with special historical events; or
- e. The majority of the properties embody distinctive characteristics of a style, type, period or method of construction, or are a valuable example of the use of indigenous materials or craftsmanship; or
- f. The majority of the properties represent the works of notable builders, designers, or architects.

The criteria for eligibility for listing in the City of Napa’s HRI and County Landmark status are similar to the National Register and California Register criteria previously discussed. With allowances made for minor differences in phrasing and order, the designation criteria created and adopted by the City of Napa’s HRI for *Landmark Properties* and *Landmark Districts* and the by the County for landmarks are essentially the same as the criteria listed in the National Register and the California Register. In all cases, historical resources may be found significant for their association(s) with

events, individuals or groups, social or cultural movement(s), their architectural and design qualities, and/or with architects recognized as significant.

Accordingly, the eligibility evaluation in this study includes criteria relevant to federal, State, and local registers. Moreover, the similarity of the County and City's criteria for listing to those of the California and National registers ensures that a resource found significant under State and federal register criteria will also be eligible for local listings as well.

d. Project Site Cultural Resources. Eastman found the three buildings fronting the crescent-shaped driveway entrance to campus (Buildings A, B, and C) "to be in good condition and potentially eligible for listing in the National Register of Historic Places and the California Register of Historic Resources under Criterion C for Architecture."²⁹ The buildings are also listed on the City of Napa HRI, a recognized local historical resource register.

An updated historical evaluation of the built-environment resources in the project site is included in the Cultural Resources Study provided in Appendix C and is summarized below. The current study considers the resources in the project site on a district level and identifies the Napa County Infirmary Historic District (District), which includes buildings and landscape elements and is shown in Figure IV.B-1.³⁰ The District comprises four elements:

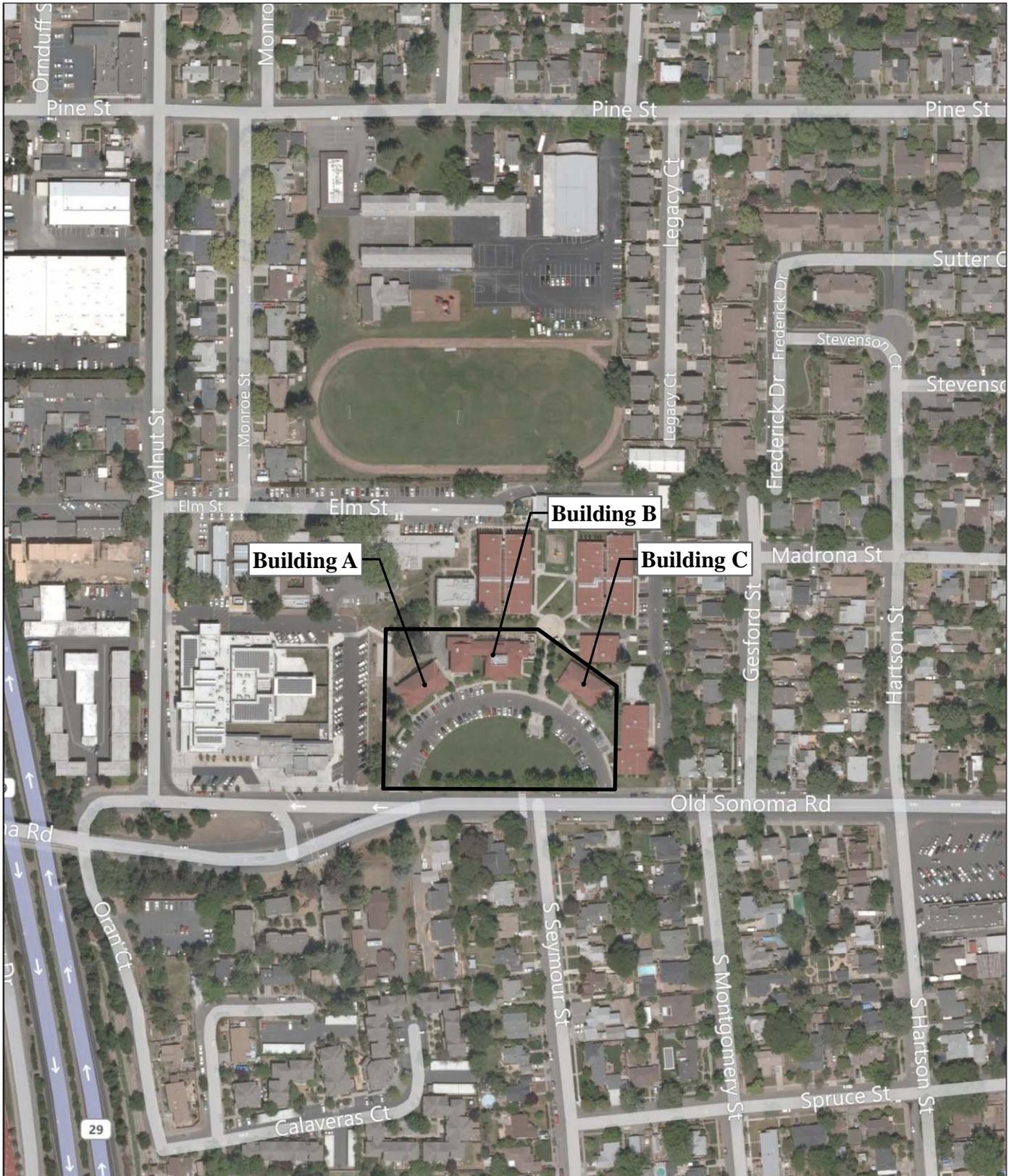
- Building A;
- Building B;
- Building C; and
- the crescent-shaped driveway and adjacent semi-circular grassy setback separating Old Sonoma Road from the crescent-shaped driveway.

The District appears eligible for listing under National/California Register criteria C/3 because it: 1) embodies the distinctive characteristics of a type, period, or method of construction (Mission and Prairie style architecture); 2) represents the work of a master (William Corlett); and 3) represents a significant and distinguishable entity whose components may lack individual distinction. The buildings within the District (Buildings A, B, and C) were designed by William H. Corlett, a prominent Napa Valley-based architect who designed other National Register-eligible properties, such as the Franklin Street Post Office at 1351 Second Street in Napa, the St. Helena Star Building at 1328 Main Street in St. Helena, and the Carnegie Library at 1360 Oak Avenue in St. Helena. The District is anchored by the signature crescent-shaped driveway, a landscape feature dating to the 1880s. The symmetrical arrangement of the three Prairie and Mission Revival-style buildings along the crescent-shaped driveway reinforces a planned aesthetic and arrangement of the District.

Overall, Buildings A, B, and C are in fair to good condition and the contributing landscape elements of the crescent-shaped driveway and setback from Old Sonoma Road remain intact. Collectively, the District retains its prominent visual and design characteristics dating from its period of significance of 1910-1936.

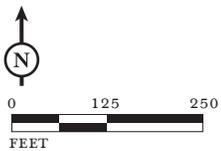
²⁹ Eastman, Bright, 1997, op. cit.

³⁰ A district is a resource that possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.



LSA

FIGURE IV.B-1



 Napa County Infirmary
Historic District

*Napa County Health and Human Services Agency
Campus Project EIR
Napa County Infirmary Historic District*

SOURCE: MICROSOFT BING, 2011.

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It is LSA's opinion that the District also appears eligible for designation as a County landmark due to its embodiment of distinctive architectural characteristics of a style, type, or period and its identification with the work of an architect, builder, or designer whose work has influenced the development of the county. LSA concurs with the City of Napa's conclusion that the property appears eligible for landmark status (City HRI rating "2").

The project site contains approximately 23 additional structures erected within the last 50 years. Many of the more recent buildings are pre-manufactured portable buildings used for office space. These buildings are less than 50 years old and are not eligible for listing in the National Register or California Register either individually or as part of the District.

Cultural Resources not Significant under CEQA. The project site contains a recorded historical archaeological site, CA-NAP-915H. CA-NAP-915H consists of surface features – including cement structure pads, a dry-laid stone-lined pond, a pumphouse, and a raised concrete foundation – and a subsurface, roughly circular feature consisting of inverted stoneware ale bottles. Eastman noted that the archaeological site "... does not appear to have historical significance or important information for research" and is, therefore, not eligible for listing in the National Register." Previously unidentified archaeological sites may underlie the project site, however. Please see the Impacts and Mitigation Measures section below.

2. Impacts and Mitigation Measures

The following section describes potentially significant project impacts to cultural resources. Mitigation measures are recommended to avoid, minimize, or mitigate such impacts where applicable. Potential impacts associated with the accidental discovery of paleontological resources or human remains interred outside of formal cemeteries are addressed in the Initial Study included as Appendix B. Mitigation Measures CULT-1 and CULT-2 are recommended to reduce these impacts to a less-than-significant level.

a. Criteria of Significance. Implementation of the proposed project would have a significant impact on cultural and/or paleontological resources if it would:

- Cause a substantial adverse change in the significance of a historical resource as defined in *CEQA Guidelines* Section 15064.5. Specifically, substantial adverse changes include physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the historical resource would be materially impaired; or
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to *CEQA Guidelines* Section 15064.5.

b. Project Impacts. The following discussion describes the significant and less-than-significant impacts to cultural resources that would result from implementation of the proposed project.

(1) Historical Resources. As depicted in Figure IV.B-1, the project site includes the Napa County Infirmary Historic District, which comprises three buildings (Buildings A, B, and C) and a crescent-shaped driveway and associated semicircular grassy setback. The District 1) is eligible under criteria C/3 of the National and California register; 2) appears eligible for landmark status within the City of Napa (City HRI rating "2"); and 3) appears eligible as a County landmark. The District is a historical resource for purposes of CEQA because it is included in a local register of historical

resources (as defined in section 5020.1(k) of the PRC) and the District appears eligible for listing in the National and California registers.

The Existing Site Option (shown in Figure III-4 in Chapter III, Project Description) would raze all buildings that contribute to the District (Buildings A, B, and C) along with the crescent-shaped driveway. As noted in the *CEQA Guidelines* (Section 15064.5(b)), the significance of a historical resource is “materially impaired” when a project demolishes or materially alters, in an adverse manner, those physical characteristics of the resource that convey its historical significance and that justify its inclusion on, or eligibility for inclusion in the California Register or a local register of historical resources. The Existing Site Option, therefore, would have a significant impact on a historical resource because it would demolish a historically significant District. Implementation of Mitigation Measures CULT-3a and CULT-3b,³¹ described below, would reduce the severity of the impact, but it would not be mitigated to a less-than-significant level.

The Expanded Site Option (shown in Figure III-6 in Chapter III, Project Description) would retain all buildings contributing to the District (Buildings A, B, and C) along with the crescent-shaped driveway, and four new one- to three-story buildings would be constructed behind (north) of Buildings A, B, and C. Buildings A, B, and C would also be renovated under this option using the *Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* (Guidelines), and these renovations would be overseen by an individual who meets the Secretary of the Interior’s Professional Qualifications Standards for architectural history or historic architecture.

The Expanded Site Option would have a less-than-significant impact on the District. The new construction would not be within the historic District nor would it introduce new buildings that would obscure or otherwise visually detract from the historical buildings and landscape elements as viewed from Old Sonoma Road (see Figures IV.A-2b and IV.B-3b in Section IV.A, Visual Resources for visual simulations of the Expanded Site Option as seen from Old Sonoma Road). The renovations of the contributing buildings to the District would result in a less-than-significant impact since these would be done using the Guidelines (*CEQA Guidelines* section 15064.5(b)(3)).

Under CEQA, archaeological sites can also qualify as “historical resources.” For purposes of the Impacts analysis, however, potential adverse effects to archaeological sites from the project options are discussed in the Archaeological Resources section below.

Impact CULT-3: Implementation of the Existing Site Option would demolish all buildings that contribute to the Napa County Infirmery Historic District along with the crescent-shaped driveway, which would adversely affect a historical resource as defined under CEQA. (S)

Mitigation Measure CULT-3a: Prior to demolition activities on the campus, the County shall retain a qualified cultural resources professional to prepare a historical context report and photo-documentation of the Napa County Infirmery Historic District. Photo-documentation of the District shall be included in the report to provide additional descriptive data and a perma-

³¹ As previously described, the Initial Study included a discussion of potential impacts to paleontological resources and human remains. Mitigation Measures CULT-1 and CULT-2 are recommended in the Initial Study to reduce these impacts to a less-than-significant level; therefore, the numbering of Impacts and Mitigation Measures in this section begins with identification of Impact CULT-3 and corresponding Mitigation Measure CULT-3.

ment visual record of the resources. The photo-documentation shall be done according to Historic American Building Survey/Historic American Engineering Record (HABS/HAER) guidelines.³² Based on the curation requirements of the receiving institution, either hardcopies and/or electronic copies of the report and photo-documentation shall be offered to the Napa County Historical Society, Napa County Landmarks, Napa Valley Museum, Preservation Napa Valley, the Napa County Library, and the Northwest Information Center at Sonoma State University. The County shall also be responsible for ensuring that the report and photo-documentation are available to the general public via the internet.

Mitigation Measure CULT-3b: The County shall set aside a publicly accessible space within the project site for an interpretive panel that documents the historical significance of the project site and Napa County Infirmary Historic District. The panel shall include historical photographs and/or drawings of the Napa County Infirmary Historic District. The County shall also be responsible for ensuring that the panel is maintained and visible to the general public. The location of the interpretive panel shall be depicted on the final Master Plan for the site. (SU)

Implementation of Mitigation Measures CULT-3a and CULT-3b would reduce the severity of the impact to the Napa County Infirmary Historic District by documenting the form, materials, spatial organization, and historical background of the resource in a manner that allows future visitors to the project area to gain a sense of the facility's past through public interpretation. Archiving will ensure that a physical, graphical record of the District will remain accessible to future researchers and the interested public who will not visit the project area. However, though these mitigation measures reduce impact severity, the loss of the Napa County Infirmary Historic District cannot be mitigated to a less-than-significant level. Therefore, this impact would be significant and unavoidable.

(2) Archaeological Resources. As described above, the project site includes recorded historical archaeological site CA-NAP-910H. Eastman noted that the site "... does not appear to have historical significance or important information for research." Although previous construction on the HHSA campus may have destroyed much of this site, the potential for additional subsurface components of CA-NAP-910H, or other historical archaeological deposits associated with the Napa County Infirmary's history, cannot be discounted.

Both the Existing Site and Expanded Site project options include grading and trenching up to a maximum depth of 25 feet. These project ground-disturbing activities have the potential to impact subsurface archaeological resources, which could have a substantial adverse change in the significance of these resources. The County's Standard Conditions of Approval address measures to be implemented in case of accidental discovery of unrecorded resources or human remains during ground disturbing activities. These conditions require work to stop within a 50-foot radius of a discovery and describe the appropriate contact and reporting requirements. However, these measures address accidental discovery through the course of regular construction activities and, because of the sensitivity of the site for the presence of unrecorded resources, would not be sufficient to ensure that potential impacts to unrecorded archaeological resources would be reduced to a less-than-significant level. Therefore, implementation of Mitigation Measure CULT-4, described below, would be required to reduce this potential impact to a less-than-significant level.

³² National Park Service, 2001. HABS/HAER Photographs: Specifications and Guidelines. Washington, D.C.

Impact CULT-4: Ground-disturbing activities associated with both the Existing Site and Expanded Site Options have the potential to disturb previously unrecorded subsurface archaeological resources. (S)

Mitigation Measure CULT-4: Construction-related ground disturbance below soil that is demonstrated to be fill³³ shall be monitored by a qualified archaeologist. In the event that subsurface archaeological resources are uncovered, archaeological monitors shall be empowered to halt construction activities at the location of the discovery to review possible archaeological material and to protect the resource while the finds are being evaluated. Monitoring shall continue until, in the archaeologist's judgment, cultural resources are not likely to be encountered.

Archaeological monitoring shall be implemented through the execution of an Archaeological Monitoring and Evaluation Plan (AMEP). The purpose of the AMEP is to ensure that significant archaeological deposits discovered during construction are identified, evaluated, and appropriately treated through the use of a pre-established research design and field evaluation strategy, consistent with the requirements of *CEQA Guidelines* §15126.4 (b)(3)(C). The AMEP shall be approved by the County well in advance of construction, and its implementation shall be made a condition of the issuance of a grading or building permit for the project. The AMEP shall be prepared by a professional who meets the Secretary of the Interior's Professional Qualifications Standards in historical archaeology and prehistoric archaeology (36 CFR Part 61, Appendix A).

The AMEP shall include a construction monitoring component and an evaluation component. The *monitoring* component of the AMEP should refine the archaeological sensitivity of the project area to: (1) identify areas that will be subject to monitoring; (2) define the frequency of monitoring; and (3) identify those areas with little to no possibility of containing intact deposits. This assessment shall focus on the project area's land use history based on available historical maps and photographs, past site improvement/utilities construction plans, historical documents, and soils/geotechnical information.

The *evaluation* component of the AMEP would guide fieldwork if archaeological resources identified during monitoring are evaluated for legal significance. The purpose of this component is to establish an evaluation process to shorten the time necessary to respond to and evaluate discoveries made during archaeological monitoring. The evaluation component shall contain a field study and technical analysis work plan to guide the methods and procedures to be used during the significance evaluation.

In the event that archaeological resources are identified during project ground-disturbing activities and an archaeological monitor is not on site, the County's Standard Condition of Approval for accidental discovery of archaeological artifacts and human remains shall apply. (LTS)

Most archaeological resources that are eligible for listing in the California Register – and, therefore, significant for purposes of CEQA – are eligible under Criterion 4 for their ability to yield information

³³ The presence and depth of fill soils in the project site should be corroborated by geotechnical information.

important in prehistory or history (see Regulatory and Legislative Context section for a discussion of the California Register). In those instances in which an archaeological resource is identified and is found significant under Criterion 4, implementation of Mitigation Measure CULT-4 would reduce the project's potential impacts to a less-than-significant level by ensuring that the resource's information potential is realized pursuant to the evaluation guidance presented in the AMEP.

c. Cumulative Cultural Resources Impacts. Aside from the proposed project, there are no current or reasonably foreseeable projects under review by the City of Napa or the County that may impact historical resources in the vicinity of the site. However, in conjunction with projects that occurred on the project site in the 1990s that included the removal of other historical resources consisting of an 1890 hay barn, a circa 1900 maintenance building, a circa 1880s Italianate cottage, and a circa 1900 work shop, the Existing Site Option would result in a cumulatively significant impact to historical resources under CEQA. The project would result in another removal of built environment resources that, when considered in conjunction with the past actions described above, further reduce the integrity of the District and render it no longer able to convey its historical qualities.

Mitigation Measures CULT-3a and CULT-3b would reduce the severity of the project's contribution to the cumulatively significant impact. However, as with the project-specific impact to the Napa County Infirmary Historic District, these mitigation measures would not reduce the severity of this impact to a less-than-significant level. Therefore, this impact would be significant and unavoidable.

The Expanded Site Option would not contribute to a cumulatively significant impact to historical resources as the historic District would not be razed or otherwise affected by this option.

When development proposals are received by the City in the future, these will undergo environmental review pursuant to CEQA and, when necessary, mitigation measures will be adopted as appropriate. In most cases, this environmental review and compliance with relevant objectives and policies of the General Plan will ensure that significant impacts to historical resources will be avoided or otherwise mitigated to a less-than-significant level.

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