

July 13, 2010

Mr. Greg Brown, Director  
City of Port Hueneme Redevelopment Agency  
250 North Ventura Road  
Port Hueneme, CA 93041

Subject: Review and Comment on the Draft Environmental Impact Report  
for the 245 E. Port Hueneme Road Demolition and Reuse Project,  
Case No.10-308, Assessor's Parcel Number (APN): 206-0-094-050

Dear Mr. Brown:

The Port Hueneme Cultural Heritage Board ("CHB") held a public hearing on June 21, 2010 at the Port Hueneme Community Center on Park Avenue, Port Hueneme to review and discuss the Draft Environmental Impact Report ("EIR") for the 245 East Port Hueneme Road Demolition and Reuse Project. At your request, a copy of the draft minutes of the CHB meeting was provided to you in electronic form on July 1, 2010.

The following CHB comments on the Draft EIR are provided to the Port Hueneme Redevelopment Agency as the lead agency:

- The CHB agrees with the San Buenaventura Research Associates' Historic Resources Report findings that the 245 E Port Hueneme Road project site should be considered "historically significant" by the lead agency according to CRHR Criteria 1 and 3 [CEQA Guidelines, §15064.5(a)(3)(A) and (C)].
- The Draft EIR Cultural Resources Section 4.1c (Potentially Historic Properties within the APE and Site Vicinity, p. 4.1-6) does not identify the Folk Victorian residence (Wiltfong House built in 1894) located at 309 N. Second Street as Ventura County Landmark No. 98.
- In preparing the Draft EIR, a complete and true project was not fully analyzed. Specifically, the EIR states "*the project involves the demolition of an existing residential structure located at 245 E Port Hueneme Road to allow for future redevelopment of the site in accordance with the current C-1 zone.*" The project seems to end at the demolition phase. The CHB considers the demolition and the future hypothetical 5,000 square foot commercial construction an improper segmentation. Under the CEQA Guidelines, "Project" means the whole of an action, which has a potential

for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment . . . .” (CEQA Guidelines, § 15378, subd. (a).) A lead agency may not sever the project into smaller units in order to avoid consideration of the entire project. The Draft EIR should be revised to include the true and final project analysis.

- There appears to be a lack of analysis regarding archaeological information in the Draft EIR for this site. The Draft EIR does not identify whether a records search was completed for prehistoric and historic archaeological resources. The Project’s Initial Study Checklist [Section V, (b-d), p. 8] states “*The project site is already developed; therefore, it is unlikely that intact archaeological resources, paleontological resources . . . . are present.*” The Initial Study responses and the Draft EIR did not provide substantial evidence to support this finding.
- As noted in the Draft EIR, Section 4.1.1(d), “*Charles B. McCoy was one of the first merchants to settle in the new town of Hueneme, but he made no known significant contributions to the town of Hueneme.*”(p. 4.1-6). Charles B McCoy may not have made significant contributions to the town of Hueneme, however; he played a significant role of importance in the development of Simi Valley and its past. C.B. McCoy was the proprietor of the Simi Hotel, one the first hotels built in Simi Valley in 1888 and was in charge of the Simi Land and Water Company formed in 1887 to divide and sell landholdings from the estate of Thomas A. Scott. In fact, Mount McCoy, located at the west end of Simi Valley is named for its past owner, C.B. McCoy.
- The Draft EIR does not provide a reduced-footprint size project alternative to avoid the demolition of the potentially eligible historic resource. If the potentially eligible historic structures were moved within the site and the size of the future commercial project’s footprint was reduced, the basic project objective of allowing for future commercial redevelopment of the site would be fulfilled. In addition, this alternative would reduce the potential impact for disturbance and release of asbestos and lead-based paint, and would reduce the proposed project’s unavoidably significant impact related to historic resources to less than significant level.
- The Draft EIR considers the alternative of relocating the onsite structures to another site but this alternative is rejected as not feasible. During the CHB tour of the subject property, you mentioned that the Redevelopment Agency owns property on Scott Street in Port Hueneme which could be considered suitable to relocate these structures, however, this site is not identified in the Draft EIR and in fact, the Draft EIR states that “*this*

*alternative is not considered feasible due to the costs of relocation and lack of a suitable site in Port Hueneme.”*

- The Draft EIR identifies photo documentation as the only feasible mitigation measure to avoid potential historic resource impacts. The recommended Mitigation Measure CR-1 (p. 4.1-9) “*would reduce impacts to the degree feasible. However, because the structures would be demolished, the impact would remain unavoidably significant.*” The Draft EIR should be revised to fully analyzed feasible project alternatives to mitigate the impacts of commercial redevelopment at such time when the proposed project and its use is known and the size of the proposed building(s) is confirmed.

Please note that at the hearing, the CHB found that the significant historically; that the effect of demolition creates a significant adverse impact; and that the entire EIR is flawed and improper segmentation of the true project has occurred because the final project is unknown. Furthermore, the CHB found that the Draft EIR’s adaptive reuse alternative (Alternative 2) is poorly written. Relocating the structure on its own existing site and rehabilitating the structure with a new floor system using the much more lenient historical building code would make the site useable and Alternative 2 feasible.

The Board appreciates the opportunity to comment on the Draft EIR. If you have any questions regarding the comments, please contact Nicole Doner at (805) 654-5042, or by email at [nicole.doner@ventura.org](mailto:nicole.doner@ventura.org).

Sincerely,

Gary Blum, Chair  
Port Hueneme Cultural Heritage Board

c: Port Hueneme Cultural Heritage Board