



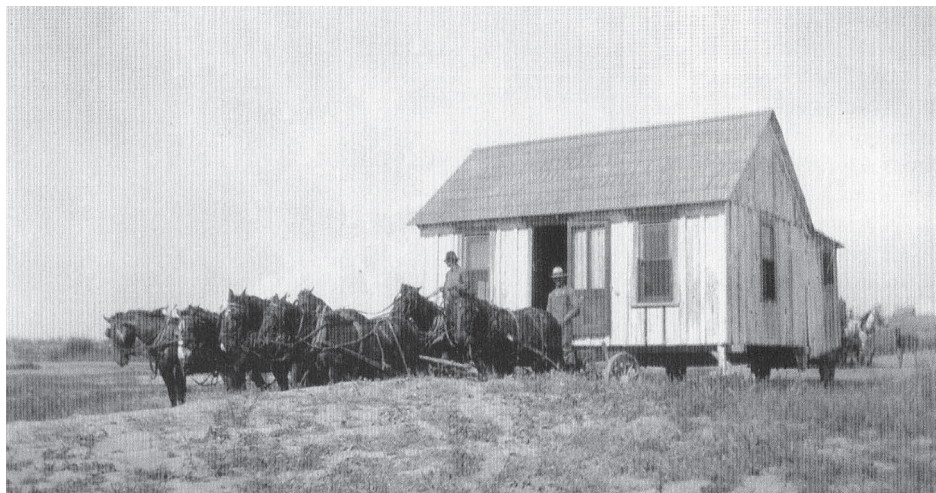
June-21-2010

Re: Comments on 245 E. Port Hueneme Road EIR (State Clearinghouse No. 2010031087)
Greg Brown
Community Development Director
City of Port Hueneme | Port Hueneme Redevelopment Agency
250 North Ventura Rd. Port Hueneme, CA 93041

Dear Mr Brown,

The San Buenaventura Conservancy works through advocacy and outreach to preserve the irreplaceable historic, architectural and cultural resources of Ventura County. The Conservancy's comments regard significant impacts in the City of Port Hueneme Redevelopment Agency's (RDA) Environmental Impact Report (EIR) for 245 E. Port Hueneme Road Demolition and Reuse project. The San Buenaventura Conservancy was not noticed on the Notice of Preparation, Initial Study or DEIR, although we consistently comment on other Environmental Documents prepared by Rincon Consultants and other municipalities in Ventura County. This is the Conservancy's first comment on this project since it was brought to our attention June 16.

Hueneme, as it was called, was platted in 1869, and by 1885 was a thriving commercial center before Oxnard was ever imagined. Then in 1899 the Oxnard brothers finished their huge sugar beet processing factory in the middle of the fertile plain, creating a catalytic project had a huge cumulative effect on the region. Workers flocked to work in and around the factory and to support its operations. In the early 1900s the citizens of Hueneme, sensing the opportunity of explosive growth of the new city of Oxnard (incorporated in 1903), packed up their things and moved north – four miles. This may not seem unusual, but because of the proximity of the two towns, they took their homes and businesses with them. On wagons pulled by mules, the town's houses and businesses were systematically dismantled, upended and moved up the road, leaving Hueneme with a dwindling population and a lack of homes and businesses – buildings like the 1885 folk-Victorian house at 245 E. Port Hueneme Road. Today, because of this ironic twist of fate, Oxnard has more 19th century structures than Port Hueneme, and though the house at 245 E. Port Hueneme Road may not be a grand Victorian mansion, it is incredibly important because it is one of the only remaining structures associated with the beginnings of Hueneme and the first pioneer settlers in the area.





THE COLONIAL HOUSE IN OXNARD WAS DEMOLISHED FOR A “FUTURE DEVELOPMENT” 20 YEARS AGO, ITS FIREPLACE STILL STANDS IN THE EMPTY LOT CREATED BY THE PREEMPTIVE DEMOLITION.

The Conservancy’s comments are:

1. The EIR is inadequate for failing to consider the impacts of the future development that will be triggered and facilitated by the clearing of the site. The demolition will act as a catalyst for development, and failing to consider environmental impacts would be an **improper segmentation** of the true project. The site is being cleared for a reason (stated on page ES-1 “...*would be redeveloped in accordance with the current C-1 zone.*”). As in *City of Antioch v. City Council of Pittsburg (1986) 187 Cal.App.3d 1325*, in which construction of a sewer line and roads required an EIR to consider future development, even if environmental impacts of the future development of a site cannot be precisely known, “*it is very likely that they will be substantial*” and therefore must be studied before the development “*gains irreversible momentum.*”
2. Please revise the EIR to include analysis, mitigation, and alternatives to the reasonably foreseeable future development. The alternatives section of the EIR is remarkable in its brevity and lack of analysis. The proposed project would destroy historic resources of local, state and national importance, and feasible alternatives to mitigate the impacts of demolition cannot be adequately identified without consideration of likely future uses of the site - briefly noted as “commercial uses” in the EIR (but possibly “housing units” see section 10). The RDA is continuing to acquire parcels in the block and with every acquisition the opportunities and constraints for potential reuse and restoration of the property change. The EIR should identify an exact project with size, use, parking, and infrastructure constraints in a revised EIR. There should not be a rush to demolish our heritage just so that the city does not need to deal with vandalism and the homeless, and the building should be secured and stabilized until adaptive reuse can be initiated.
3. The EIR’s cumulative impacts section is also incomplete and inadequate for failing to consider the reasonably



foreseeable development of the cleared site, as noted in sections 1 and 2, as well as the possible cumulative effects of Port Hueneme's redevelopment plans on the city's other historic properties in the Redevelopment area and the adverse impact to the potential thematic historic district – with County Landmarks 98 and 86 – should also be considered in a revised EIR.

4. The EIR's aesthetic impacts section is inadequate for failing to analyze the significant impact on the aesthetic quality and feel of N. Port Hueneme Road. The removal of historic buildings and mature tree will substantially degrade the existing visual character of the site by demolishing an historic resource with high historic and visual integrity and aesthetic qualities.

5. The archeological analysis in section V. b-d) in the Initial Study states: *"The project site is already developed; therefore, it is unlikely that intact archaeological resources, paleontological resources, or human remains are present."* This is flawed reasoning in areas of known Chumash occupation such as Port Hueneme. Further analysis, with an archeologist and a representative of the Chumash tribe, and including exploratory trenching to establish the possibility of archeological deposits, should be undertaken before any ground disturbance, including the demolition of existing structures, or removal of underground utilities. In addition, since the site was occupied in the late 19th century there is a high likelihood of a historic trash pit or privy associated with the historic era being found on the site, this should be analyzed in a new EIR, and required archeological mitigations included.

6. The project objectives should be corrected to more accurately include the objective of productive future use of the site. Demolition and clearing of a valuable property is never the end-point objective, and the EIR fails as a good faith public disclosure if it is not straightforward about the true nature of this project.

7. The EIR forecloses alternatives and mitigation measures {contrary to CEQA Article 1, section 15004(B)}. Mitigation measure CR-1 is not the only feasible mitigation for the project, and there are no archeological mitigation measures included in the EIR. Without the knowledge of the potential future project, there is no way to determine the feasibility of alternatives such as: adaptive reuse, integration of the resource into the new project, or additions and expansion of the existing buildings to accommodate commercial (or housing) uses. Future mitigation measures are also eliminated by demolition of the resources, like moving the buildings within the same parcel to accommodate a project, partial reuse of some of the elements of the buildings, commemorative programs, moving the buildings to facilitate their retention in Port Hueneme, or design mitigations informed by the historic buildings. Additionally the City of Port Hueneme could – in any case – mitigate the potential cumulative effect of continued loss of historic resources by conducting a city-wide historic survey to identify and protect other historic resources and landmark remaining historic sites.

8. Page 4.1-9 of the EIR includes this statement: *"Another possible mitigation measure would involve relocating the onsite structures to another site. However, due to the costs of relocation and lack of a suitable site in Port Hueneme, this measure is not considered feasible."* This statement does not reflect the cost of developing the new project on the property, and so financial feasibility cannot be analyzed compared to the total budget of the new project. Costs of relocation may be less than 1% of the total project cost of a new building, and as such, would in fact be feasible. There is no explanation or analysis of why there is no *"suitable site in Port Hueneme"* for relocation. The costs of the whole project should be considered in a revised EIR.

9. Alternative 2 considers adaptive reuse but unnecessarily constrains the reuse by not allowing for expansion or increase in the building envelopes or heights, or the option of moving the buildings on the parcel, which makes the alternative less feasible. Through the use of the Secretary of the Interior's Standards for the Treatment of Historic Properties, additions and modifications can be added to historic resources without negatively impacting their historic integrity. A "restoration and expansion" adaptive reuse alternative should be fully analyzed in



the revised EIR, this would not only be the environmentally superior alternative (re: cultural and hazardous materials impacts), but it would also fulfill the basic project objective of allowing for future redevelopment of the site with commercial uses that would be more compatible with existing and planned future commercial development along the north side of E. Port Hueneme Road.

10. It is worth noting that the Historic Resources Report (in EIR appendix B) was conducted to assist the City of Port Hueneme RDA in their compliance with the NEPA and CEQA: *"...in connection with a proposal to demolish and the residence and outbuilding at 245 Port Hueneme Road, and **to develop new housing units on the property.**"* Yet the EIR makes no mention of potential housing. Mitigations like integration of the resource into a housing project as a single or multiple unit are potentially feasible by nature, and may be very different than the mitigations for a commercial development. In the event that the future project (undertaking) is federally funded in any way – NEPA (section 106) analysis should be conducted and a Memorandum of Understanding (MOU) should be executed with the State Office of Historic Preservation stipulating the appropriateness of the mitigations in eliminating or minimizing the adverse effects of the undertaking.

The Conservancy believes that a revised EIR must examine the potential mystery future project – be it residential or commercial – so that all feasible alternatives and mitigations can be brought to light without foreclosing options, alternatives, mitigations, and/or public comment. Thank you for the opportunity to comment on the future of this rare remaining 19th century Port Hueneme residence.

Please add the San Buenaventura Conservancy to the City of Port Hueneme's list of interested parties for noticing on future projects and environmental documents.

Regards,

The San Buenaventura Conservancy Board of Directors

cc: State Office of Historic Preservation
National Trust for Historic Preservation, Western Regional Office
California Preservation Foundation
Ventura County Cultural Heritage Board