

DOCKETED

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San Buenaventura Conservancy Cultural Impact Comments

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Additional submitted attachment is included below.



■ To: California Energy Commission
From: San Buenaventura Conservancy
Subject: Preliminary Comments on PSA, Mission Rock Energy Center
Date: February 28, 2018

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 the Mission Rock Energy Center project cultural resources and aesthetics portions of the PSA which appear to have significant impacts and inadequate mitigations.

Regarding the transmission lines across the Santa Clara River Valley: The impact of new monopole transmission lines cannot be fully mitigated by off-site mitigation measures that, while worthy, do not address the severe, permanent, negative visual and aesthetic impact of visually bisecting the valley between Ventura and Santa Paula, referred to as the Heritage Valley. The only meaningful mitigation that would reduce the impact on the district is undergrounding or alternative alignments that relocate the transmission lines so that they do not bisect the most sensitive part of the valley. Agricultural land preservation has been the goal of County-wide planning efforts for four decades, and the County of Ventura and the cities of Fillmore and Santa Paula have been promoting heritage tourism in the Valley for over two decades (*Western Santa Clara Valley Historic Resources Survey, 1996*).



The 1996 historic survey of the Heritage Valley by the County of Ventura (*Western Santa Clara Valley Historic Resources Survey*) found the Heritage Valley to be a National Register eligible rural historic district over twenty years ago. Since 1996 little has changed in the Valley. The character defining features that make this rural district so significant are its aesthetic qualities: the unchanged vistas across the Valley, the lack of development, and the rural character that has been consistent for over 100 years. All of these features will be adversely impacted by the tall monopole transmission lines being proposed by the Mission Rock Energy Project.

The National Register eligible rural agricultural district is historically significant and has all seven of the aspects of integrity that are required to convey its significance:

Association: The elements of the district are mostly associated with a context of agriculture and corresponding rural development. Orchards, row crops, farm buildings, rural water conveyance systems, and low-rise agricultural and transport infrastructure is dispersed valley-wide in an eclectic, vernacular plan. The proposed



steel monopoles with balls on wires are associated with large scale power generation and transmission and not rural agriculture and will negatively impact the high integrity of association of the rural agricultural district.

Design: The ranches, subdivisions, orchards and agricultural operations in the Heritage Valley have evolved organically from early land grants to farm subdivisions and again as properties were subdivided or combined over the last 150 years. The result is vernacular, unplanned, and erratic rural development that has miraculously not been eroded by modern development. The major exception is the insertion of the State Route 126 freeway through the Heritage Valley which now acts as a barrier to north-south movement and has also created unforeseen negative development pressures. Uses that are not sympathetic to the rural district have mostly been established south of SR 126. This has created a cumulative adverse impact to the rural district south of the freeway. This is evident when evaluating the current historic integrity north of SR 126 and the eroded integrity south of SR 126. The proposed development site of the Mission Rock Energy Plant, south of the freeway, illustrates these cumulative adverse impacts by adding another highly developed energy generation facility and transmission lines incompatible with the rural historic district in the area south of SR 126. The bisecting of the rural district with proposed steel monopoles will create another similar modern division across the Heritage Valley with the potential for more erosion of historic integrity in the areas adjacent to the transmission line. The modern, tall, steel monopoles are not designed to be harmonious to the rural district and will negatively impact the currently high historic integrity of vernacular design.



Materials and Workmanship: Orchards, ranches, row crops and agricultural operations make up the vast majority of the uses in the area of the monopole transmission line. Besides the obvious biological “materials” inherent to the Heritage Valley’s dense agricultural operations, the residences within the district are low-slung, mostly built of wood, adobe and stucco; the commercial structures are vernacular wood and sheet metal agricultural structures and barns, stucco packing plants, and semi-temporary greenhouses. Narrow paved roads which are bordered by simple dirt-lined drainage ditches crisscross the valley. The infrastructure and development in the Valley is the definition of rural and vernacular. The proposed steel monopoles with balls on the wires are incongruous with the district’s consistently rural and agricultural materials and workmanship.



Feeling, Setting and Location: The Location will not change but the Feeling and Setting are critical qualities in an historic district, because a district, especially a rural district as large and complex as the Heritage Valley, involves many parts. The way people experience something as intangible as a rural agricultural historic district is through the feeling the district evokes and the setting that the district embodies: Does it feel like we have gone back in time when we stand in the middle of the Heritage Valley? Yes. The reason Hollywood uses the Heritage Valley for filming is because the setting (the background view) is authentic and unmolested. The transmission portion of the project could not be in a worse location. The views from all points north, east, west, and south of the transmission line will be negatively affected from multiple properties, County roads and SR 126.

This project proposes a transmission line that will bisect the area of the Valley's highest historic integrity – the highest concentration of historic resources and the fewest modern interventions. Most historic districts have changed over time, the Heritage Valley is so effective at conveying its significance because it is so intact and has changed so little. Because it has lasted and is so historically intact, it needs to be afforded all feasible protections. The aesthetic impact of the monopole transmission lines is significant and unmitigable by any means that does not remove the visual impact. Unlike a single site development, the linear nature and height, length and placement of the line adversely affects views within the district from many square miles. Redesign as undergrounded transmission lines or a realignment outside the rural district are feasible and are the only mitigation that will maintain the historic integrity of feeling and setting. The proposed steel monopoles with balls on wires begin the cumulative adverse impacts that erode the outstanding integrity of feeling and setting in the Heritage Valley.



Proposed Mitigations:

Mitigations of the proposed More-Edwards Adobe (above) and the Sharp-Thille House, are laudable as preservation projects but have only a tenuous nexus to the adverse impacts caused by the bisection of the Heritage Valley by transmission lines. Off-site restoration efforts to the More-Edwards Adobe and the Sharp-Thille gardens produce little public benefit because they are both not publicly accessible.



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While views from the More-Edwards Adobe and Sharp-Thille properties will be adversely impacted, the views from all other project-adjacent properties and all County roads that bisect the Heritage Valley lengthwise will also be adversely impacted. This transmission line project is not hidden and obscure; 18 million car trips a year (50,000 trips a day, Caltrans, 2016 Traffic Volumes) on State Route 126 will travel under these new tall, steel monopoles with balls on the wires. The mitigations imposed on this project can permanently, effectively and feasibly reduce the adverse impacts of the bisecting transmission lines on the Heritage Valley Rural Historic District by realigning or undergrounding the lines. Any other mitigation will be significant, avoidable, insufficient and affect millions of people.

The San Buenaventura Conservancy seeks meaningful mitigations for the Mission Rock Energy Center, and compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (the Standards). Through design mitigations such as realignment or undergrounding, significant adverse impacts to the Heritage Valley Rural Historic District can be achieved as feasible mitigations that follow the Standards and maintain a highly visible public benefit for millions of visitors for future generations. This is the kind of mitigation solution the Energy Commission should strive for.

Regards,

The San Buenaventura Conservancy Board of Directors
Feb 28, 2018