

SECTION 4.4

CULTURAL AND PALEONTOLOGICAL RESOURCES

4.4 CULTURAL AND PALEONTOLOGICAL RESOURCES

This section provides a background discussion of the regulatory framework and the environmental setting for cultural resources and paleontological resources. Cultural resources consist of archaeological sites from the prehistoric and historic periods, as well as buildings, structures, and objects from the historic period. Paleontological resources consist of fossils which are the remains of once living organisms preserved in rocks and sediments. Paleontological resources are not considered cultural resources because paleontological resources are not the result of human activity. However, paleontological resources are combined with cultural resources for the purposes of CEQA because they are considered in the Cultural Resources section of the Environmental Checklist Form (CEQA Guidelines, Appendix G).

The regulatory framework identifies the federal, state, and local regulations applicable to cultural resources and paleontological resources. The environmental setting discusses the records search results, as well as paleontological context of the Project parcels. Impacts to resources that could potentially result from constructing the Project are analyzed based on state and local laws and regulations.

Information contained in this section is summarized from the “Trinity 341 Archaeological Records Search and Summary” (Loveless & Linton 2017) as well as the Phase I Environmental Assessment prepared for Trinity Property Company (EMG 2017a and EMG 2017b). The Records Search is included in **Appendix D** and the Phase I ESA is included in **Appendix F**. Both documents are provided on the attached CD of Technical Appendices of this EIR.

4.4.1 REGULATORY FRAMEWORK

A. STATE

Cultural Resources

California Environmental Quality Act (CEQA)

CEQA is the state law that addresses the evaluation of a project’s impacts on cultural resources. A “project” is an activity that may cause a direct or indirect physical change in the environment and that is undertaken or funded by a state or local agency, or requires a permit, license, or lease from a state or local agency. CEQA requires that all private and public activities not specifically exempted be evaluated against the potential for environmental damage, including effects to historical resources. Historical resources are recognized as part of the environment under CEQA.

CEQA defines historical resources as “any object, building, structure, site, area, or place that is historically significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California” (Division I, Public Resources Code, Section 5021.1[b]). Further, a “historical resource” is a resource that 1) is listed in or has been determined eligible for listing in the California Register of Historical Resources (CRHR) by the State Historical Resources Commission, or has been determined historically significant by the CEQA lead agency because it meets the eligibility criteria for the CRHR, 2) is included in a local register of historical resources, as defined in Public Resources Code (PRC) Section 5020.1(k), or 3) has been identified as significant in a historical resources survey, as defined in PRC Section 5024.1(g) (California Code of Regulations [CCR] Title 14, Section 15064.5(a)).

The eligibility criteria for the CRHR are as follows [CCR Title 14, Section 4852(b)]:

- (1) It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;
- (2) It is associated with the lives of persons important to local, California, or national history.
- (3) It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values; or

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- (4) It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

In addition, the resource must retain integrity. The integrity of a resource is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association [CCR Title 14, Section 4852(c)]. Resources that have been determined eligible for the NRHP are automatically eligible for the CRHR.

Lead agencies have a responsibility to evaluate historical resources against the CRHR criteria prior to making a finding as to a proposed project's impacts to historical resources. Mitigation of adverse impacts is required if the proposed project will cause substantial adverse change. Substantial adverse change includes demolition, destruction, relocation, or alteration such that the significance of an historical resource would be impaired. While demolition and destruction are obvious significant impacts, it is more difficult to assess when change, alteration, or relocation crosses the threshold of substantial adverse change. The CEQA Guidelines provide that a project that demolishes or alters those physical characteristics of a historical resource that convey its historical significance (i.e., its character-defining features) is considered to materially impair the resource's significance.

The CRHR is used in the consideration of historical resources relative to significance for purposes of CEQA. The CRHR includes resources listed in, or formally determined eligible for listing in, the NRHP and some California State Landmarks and Points of Historical Interest. Properties of local significance that have been designated under a local preservation ordinance (local landmarks or landmark districts), or that have been identified in a local historical resources inventory, may be eligible for listing in the CRHR and are presumed to be significant resources for purposes of CEQA unless a preponderance of evidence indicates otherwise.

Public Resources Code Sections 5097.98(b) and 5097.98 (e)

PRC Sections 5097.98 (b) and 5097.98(e) require a landowner, on whose property Native American human remains are found, to limit further development activity in the vicinity until the landowner confers with the NAHC-identified Most Likely Descendants (MLDs) to consider treatment options. In the absence of MLDs or of a treatment acceptable to all parties, the landowner is required to reenter the remains elsewhere on the property in a location not subject to further disturbance. If Native American human remains were discovered during construction of the proposed Project, the Applicant(s) would be subject to PRC Sections 5097.98 (b) and 5097.98(e)

California Health and Safety Code, Section 7050.5

California Health and Safety Code, Section 7050.5 makes it a misdemeanor to disturb or remove human remains found outside a cemetery. This code also requires a project owner to halt construction if human remains are discovered and to contact the county coroner. If human remains were discovered during construction of the proposed Project, the Applicant(s) would be subject to California Health and Safety Code, Section 7050.5.

Tribal Cultural Resources

Assembly Bill (AB) 52

Assembly Bill (AB) 52 amends Public Resources Code (PRC) Section 5097.94 and adds eight new sections to the PRC relating to Native Americans. AB 52 was passed in 2014 and took effect on July 1, 2015. It establishes a new category of environmental resource that must be considered under CEQA called tribal cultural resources (PRC 21074) and establishes a process for consulting with Native American tribes and groups regarding those resources. Under AB 52, a project that may substantially change the significance of a tribal cultural resource is a project that may have a significant impact on the environment. If a project may cause a significant impact on a tribal cultural resource, the lead agency shall implement

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measures to avoid the impacts when feasible. Environmental documents must incorporate a discussion of the impacts, mitigation measures, and notification and consultation conducted with tribes affiliated with the geographic area.

Note: Tribal Cultural Resources can be either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe. The Project parcels have been previously disturbed and are located in an industrial portion of Calexico. No tribal cultural resources are located on the Project parcels. Further, no Native American Tribes have requested consultation from the City of Calexico under AB 52. No impact would occur with regard to Tribal Cultural Resources.

PRC Section 21074

PRC Section 21074 defines a tribal cultural resource as a site, feature, place, cultural landscape, sacred place, and any object with cultural value to a California Native American Tribe (CNAT). A tribal cultural resource must be on or eligible for the California Register of Historical Resources (CRHR) or must be included in a local register of historical resources. The lead agency can determine if a tribal cultural resource is significant even if it has not been evaluated for the CRHR or is not included on a local register. No tribal cultural resources are located on the Project parcels

Paleontological Resources

California Environmental Quality Act (CEQA)

The procedures, types of activities, persons, and public agencies required to comply with CEQA are defined in the Guidelines for Implementation of CEQA (State CEQA Guidelines), as amended on March 18, 2010 (Title 14, Section 15000 et seq. of the California Code of Regulations) and further amended January 4, 2013. One of the questions listed in the CEQA Environmental Checklist is: “Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?” (State CEQA Guidelines Appendix G, Section V, Part C). No paleontological resources are known to be present buried within the boundaries of the Project parcels.

B. LOCAL

Cultural Resources

City of Calexico General Plan

The Calexico General Plan has been prepared to fulfill the requirement of California law that each city adopt a comprehensive General Plan to guide physical development of the incorporated area and land outside of the municipal boundaries. Calexico’s current General Plan dated February 2007 was adopted by the City on May 1, 2007. The General Plan does not contain any goals, objectives or policies that address cultural or paleontological resources. Therefore, a consistency analysis is not possible.

4.4.2 ENVIRONMENTAL SETTING

The area of the Project parcels was historically occupied by the Kumeyaay or “Kamia”, one of many local Native tribes collectively referred to as the Diegueño, specifically representing populations occupying an area from present-day San Diego to just west of the lower Colorado River (City of Calexico 2015a, p. 10-1). With the founding of Calexico in 1899 and the Southern Pacific Railway line extended from Niland to Calexico in 1904, additional activity and settlement took place in the area (City of Calexico 2015b, p. 92). The City incorporated in 1908 (City of Calexico 2015a, p. 1-3).

Prior to 1937, no historical data is available for the Project parcels (EGM 2017a and 2017b). After 1937, the parcels were shown as being used for agricultural land. Subsequently, the land was identified for industrial use and is a mix of vacant and industrial land within the Portico Industrial Park. As evidenced

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by past use as well as the current level of surrounding development, the Project parcels have been highly disturbed on the surface.

A. PREVIOUS STUDIES

As summarized in **Table 4.4-1**, five studies and six archaeological resources were identified within a ½-mile radius demonstrating that the area has been previously studied. The most recent study was conducted in the year 2000.

**TABLE 4.4-1
PREVIOUS STUDIES**

Report ID	Author/Year
IM-0063	Von Werlof/1976
IM-00441	ENSR Consulting and Engineering/1990
IM00605	Barrett Consulting Group/1996
IM-00647	City of Calexico/1997
IM-00765	Romulus, M/2000

Source: Loveless & Linton 2017.

B. RECORDED RESOURCES

Table 4.4-2 lists the five resources identified by the previous studies. All the resources are of historical interest and largely relate to Southern Pacific Railroad to the southwest of the Project parcels. One record identified historic refuse on the south side of West Cole Boulevard, directly opposite of the Project parcels. This may be a secondary historic deposit or historic era roadside refuse. The remaining studies identified historic structures relating to the Southern Pacific Railroad, the Niland to Calexico Railroad and the canal system.

**TABLE 4.4-2
RECORDED RESOURCES**

Primary #	Description	Historic/Prehistoric
P-13-007130	American Canal	Historic
P-13-007699	Southern Pacific Railroad; Calexico Spur	Historic
P-13-008682	Niland to Calexico Railroad	Historic
P-13-009077	Historic Structure: Cole Road Pool	Historic
P-13-012743	Drainage structure related to Canal Systems	Historic
P-13-012744	Historic Refuse	Historic

Source: Loveless & Linton 2017.

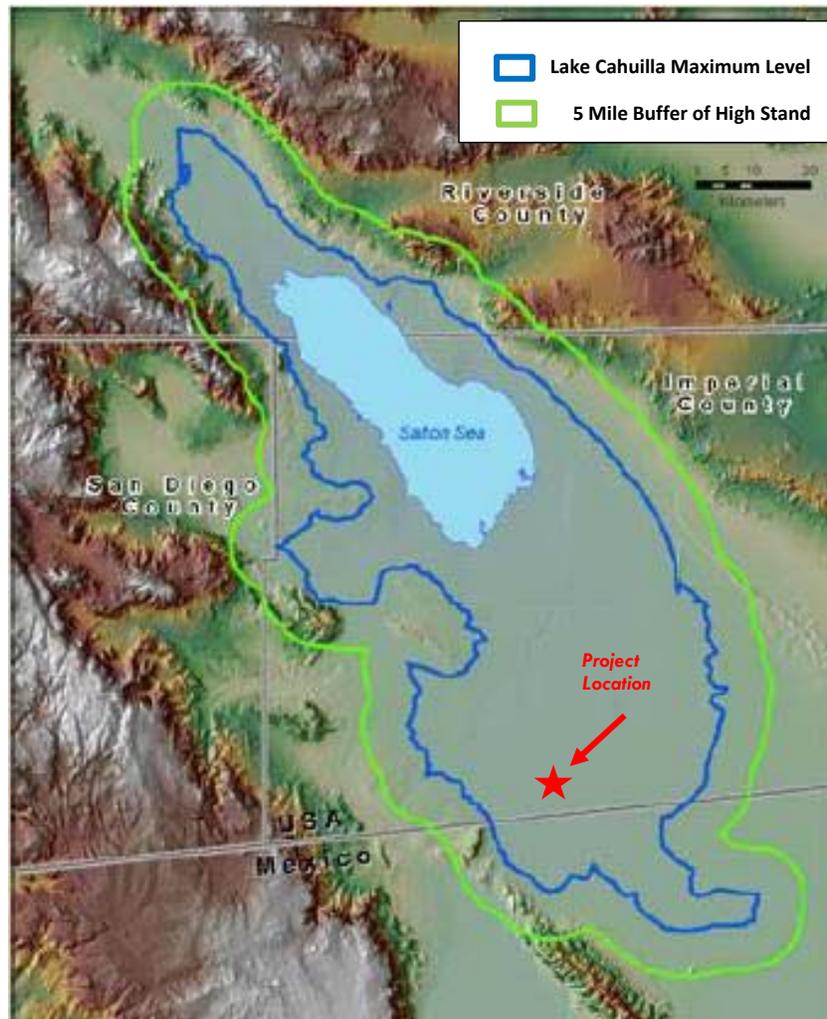
C. PALEONTOLOGICAL RESOURCES

Paleontology is defined as a science dealing with the life of past geological periods as known from fossil remains. Paleontological resources include fossil remains, as well as fossil localities and formations that have produced fossil material. Such locations and specimens are important nonrenewable resources. CEQA offers protection for these sensitive resources and requires that they be addressed during the EIR process.

The context for paleontological resources is Lake Cahuilla, a prehistoric lake that covers approximately 2,200 square miles in the Coachella and Imperial Valleys. The lake formed several times over during the Holocene era when water from the Colorado River was diverted into the Salton Trough. Geologic

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mapping indicates that the Project area is underlain by late Pleistocene to Holocene aged (approximately 37,000 to 240 years ago) Lake Cahuilla Beds (**Figure 4.4-1**).



Source: <http://the-wanderling.com/longship04.jpg>

FIGURE 4.4-1
MAP OF ANCIENT LAKE CAHUILLA

Lake Cahuilla beds have produced fossils in Imperial County and are known to have a high paleontological potential.

4.4.3 IMPACTS AND MITIGATION MEASURES

A. STANDARDS OF SIGNIFICANCE

Cultural and Paleontological Resources

The impact analysis provided below is based on the following questions from the CEQA Guidelines Appendix G. The Project would result in a significant impact to cultural and paleontological resources if it would result in any of the following:

- a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5.
- b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.

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- c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
- d) Disturb any human remains, including those interred outside of dedicated cemeteries.

Impacts to a Historical Resource, as defined by CEQA (listed in an official historic inventory or survey or eligible for the CRHR), are significant if the resource is demolished or destroyed or if the characteristics that made the resource eligible are materially impaired [CCR Title 14, Section 15064.5(b)]. CEQA Historical Resources include resources that are eligible for the NRHP or the CRHR [CCR Title 14, Section 15064.5(a)]. Such resources can be buildings, structures, and facilities from the historic period and prehistoric and historic archaeological sites. Demolition or alteration of eligible buildings, structures, and features to the extent that they would no longer be eligible would result in a significant impact. Whole or partial destruction of eligible archaeological sites would result in a significant impact. In addition to impacts from construction resulting in destruction or physical alteration of an eligible resource, impacts to the integrity of setting (sometimes termed “visual impacts”) of eligible buildings and above-ground structures and facilities in the Project area could also result in significant impacts.

Vertebrate fossils, whether preserved remains or track ways, are classified as significant by most state and federal agencies and professional groups (and are specifically protected under the California Public Resources Code). In some cases, fossils of plants or invertebrate animals are also considered significant and can provide important information about ancient local environments. Assessment of significance is also subject to the CEQA criterion that the resource constitutes a “unique paleontological resource or site.”

B. ISSUES SCOPED OUT AS PART OF THE INITIAL STUDY

Criterion “a” was eliminated from further evaluation as part of the Initial Study Checklist because all of the Project parcels have been disturbed in association with development of the surrounding industrial area. An existing building (2421 Enterprise Boulevard) is located on one of the parcels (APN 059-343-018) and the remaining four parcels are vacant, previously disturbed land. No historical resources are known to be present on any of the Project parcels. Therefore, impacts to historical resources will not be discussed in the analysis below.

C. METHODOLOGY

Cultural Resources

A California Historical Resources Information System (CHRIS) Client In-House Records Search was conducted for the property located at 2421 Enterprise Boulevard, Calexico, CA with a ½-mile radius search parameter. The Records Search was conducted by Loveless and Linton at the South Coastal Information Center (SCIC). The analysis of cultural resources is based on the findings of the records search.

Paleontological Resources

As previously noted, ancient Lake Cahuilla underlies the area encompassed by the Project parcels. Quaternary lake deposits are known to contain fossils. Because the parcels are underlain by Lake Cahuilla, the potential exists for unknown buried fossils to be present.

D. PROJECT IMPACTS AND MITIGATION MEASURES

Impacts to Historical Resources

Impact 4.4.1 Six historic resources were identified as part of the records search conducted for the Project parcels. None of the resources were identified on the proposed Project parcels.

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Therefore, **no impact** to a historic resource would occur as a result of development of the proposed Project.

All of the historical resources listed in **Table 4.4-2** were located within one-half-mile of the Project parcels. However, none were on or directly adjacent to any of the parcels. The parcels are disturbed and do not contain any historic features. Therefore, **no impact** to historical resources would occur as are result of development of the proposed Project.

Mitigation Measures

None required.

Significance After Mitigation

Not Applicable.

Impacts to Unknown Subsurface Archaeological Resources

Impact 4.4.2 Unrecorded subsurface archaeological resources if present within the boundaries of the Project parcels could be damaged during earth-moving activities. This is considered a **potentially significant impact**.

While the Project parcels have been disturbed by past agricultural activities as well as more recent development of the Portico Industrial Park, the possibility exists for archaeological resources to be present and buried beneath the Project parcels. If archaeological resources are present, construction activities such as earthmoving, trenching and excavation could potentially uncover subsurface archaeological deposits. This is considered a **potentially significant impact**.

Mitigation Measure

MM 4.4.2 Due to the extensive disturbance by past farming and the limited depth of disturbance for the proposed Project, archaeological monitoring is not required on the Project parcels. If subsurface resources are discovered by construction workers, a Registered Professional Archeologist (RPA) shall be called to the site to investigate and monitor subsurface excavations within 100 feet of the potential resource. Monitoring activities shall be supervised by an RPA who shall have the authority to determine the duration, intensity and inspection timing (from full-time to as-needed). The RPA shall be empowered to temporarily halt or divert construction operations within a reasonable distance from a find or resource exposure in order to determine if significant archaeological resources are present, and if such resource would be adversely affected by continuing construction operations. Per CEQA Guidelines Section 15126.4(b)(3)(A), preservation in place is the preferred method of mitigating impacts to archaeological sites. The RPA shall immediately notify the City of Calexico Planning Department of such discoveries/decisions.

Work shall not continue at the discovery site until the RPA, in coordination with City of Calexico Planning Department, conducts sufficient research and data collection to make a determination that the resource is either not cultural in origin; or not potentially significant or eligible for listing on the NRHP or CRHR. If a potentially-eligible resource is encountered, then the RPA, lead agency, and Project proponent shall arrange for either 1) total avoidance of the resource, if possible; or 2) test excavations to evaluate eligibility for the CRHR and, if eligible, data recovery as mitigation. The data recovery plan shall identify methods for recovering the scientifically consequential information from and about the historical resource, and recordation/deposition of data/materials

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with the local California Historical Resources Information Center (CHRIS). Any recovered artifacts would be curated with a local museum. This will enable the collection of information that may be important to the prehistory or history of the local area, California, or the nation.

Timing/Implementation: As needed, contingent upon discovery of subsurface resources/Project Contractor, City of Calexico Planning Department and RPA

Enforcement/Monitoring: City of Calexico Planning Department and RPA.

Significance After Mitigation

Implementation of mitigation measure MM 4.4.2 requires construction activities to be halted within a reasonable distance in the event that potential subsurface archaeological resources are discovered during construction. No further construction would occur until after an assessment of the resource by a RPA has been made. In addition, the data recovery plan would preserve any historical resource through appropriate recordation/deposition of data/materials with the local CHRIS. Following implementation of mitigation measure MM 4.4.2, impacts to unrecorded subsurface archaeological resources would be reduced **less than significant**.

Impacts to Nonrenewable Fossil (Paleontological) Remains

Impact 4.4.3 Fossil remains if present beneath the Project parcels could be destroyed by excavation and other earth-moving activities. This is considered a **potentially significant impact**.

All of the Project parcels are located on the former bed of Lake Cahuilla. Lakebed sediments have been proven to contain fossils or fossil remains (i.e. paleontological resources) such as invertebrates, small vertebrates, and extinct larger mammals (EGI 2014, p. 4.7-19). Due to the disturbed nature of the surface soils from agricultural practices dating back to 1937 (EMG 2017a, p. 18; 2017b, p. 3), the upper layers of soil are unlikely to contain intact paleontological remains. The absence of fossils on the surface does not preclude the possibility of fossil presence at deeper depths beneath the soil. Although deep excavations are not proposed in association with construction of the Project, if paleontological resources were encountered during earthmoving, trenching or excavation activities a **potentially significant impact** could occur.

Mitigation Measure

MM 4.4.3 Earth-moving operations impacting the soils five feet and deeper within the Project parcels shall be "spot-checked" up to two days per week by a RPA to determine whether undisturbed lakebed sediments have been encountered. If within that period no paleontological findings are discovered, no further monitoring will be required. If paleontologically sensitive soils are being impacted, the RPA would have discretion to increase monitoring to full-time within a radius of 100 meters of the find.

Paleontological monitors shall be equipped to salvage fossils as they are unearthed (to help avoid construction delays) and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. Monitors shall be empowered to temporarily halt or divert equipment to allow removal of abundant or large specimens. Recovered specimens shall be prepared to a point of identification and permanent preservation, including washing of sediments to recover small invertebrates and vertebrates. Fossil specimens shall be curated by accessioning into an established, accredited museum repository with permanent retrievable paleontological storage. A

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report of findings with an appended itemized inventory of specimens shall be prepared. Submittal of the report and inventory to the City of Calexico Planning Department along with confirmation of the curation of recovered specimens into an established, accredited museum repository, shall signify completion of the program to mitigate impacts to paleontological resources.

Timing/Implementation: During construction that includes disturbance five feet or deeper/RPA.

Enforcement/Monitoring: Project Contractor and City of Calexico Planning Department/RPA.

Significance After Mitigation

Mitigation measure MM 4.4.3 requires that an RPA be present to monitor certain excavation construction activities. The RPA would be empowered to determine the level of monitoring necessary; to halt or divert construction away from large specimens; and to curate fossil specimens. Implementation of MM 4.4.3 would reduce impacts to fossil remains to **less than significant**.

Impacts to Subsurface Human Remains

Impact 4.4.4 It is unknown whether there are human remains buried within the boundaries of the Project parcels that could be discovered during construction. Therefore, impacts to subsurface human remains are considered a **potentially significant impact**.

Based on the Records Search conducted at the SCIC, as well as the standard historical sources reviewed as part of the Phase I ESA (e.g. Aerial Photographs, Fire insurance [Sanborn] Maps) (EMG 2017a and 2017b), the Project parcels are not known to be a formal cemetery or contain any human remains. Though unlikely, there is a possibility that unknown human remains could be present beneath the ground surface which could be exposed during construction. Therefore, potential to encounter subsurface human remains is considered a **potentially significant impact**.

Mitigation Measure

MM 4.4.4 In the event that evidence of human remains is discovered, construction activities within 200 feet of the discovery shall be halted or diverted and the City of Calexico Planning Department and the Imperial County Coroner shall be notified (Section 7050.5 of the Health and Safety Code). If the Coroner determines that the remains are Native American, the Coroner will notify the NAHC which will designate a Most Likely Descendant (MLD) for the Project (Section 5097.98 of the Public Resources Code). The designated MLD then has 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains (AB 2641). If the landowner does not agree with the recommendations of the MLD, the NAHC can mediate (Section 5097.94 of the Public Resources Code). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (Section 5097.98 of the Public Resources Code). This will also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a document with the county in which the property is located (AB 2641).

Timing/Implementation: During construction/Project contractor.

Enforcement/Monitoring: NAHC, Imperial County Coroner, and City of Calexico Planning Department.

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Significance After Mitigation

Implementation of mitigation measure MM 4.4.4 requires construction activities to be halted or diverted in the event that human remains are discovered. The County Coroner and NAHC will be notified as appropriate. Following implementation of mitigation measure MM 4.4.4, impacts to subsurface human remains would be reduced to **less than significant**.

4.4.4 CUMULATIVE SETTING, IMPACTS AND MITIGATION MEASURES

A. CUMULATIVE SETTING

The geographic scope of the cumulative setting for cultural and paleontological resources includes proposed, approved and reasonably foreseeable projects in the City of Calexico described in Chapter 3.0, Introduction to the Environmental Analysis and Assumptions Used, of this EIR. Developments and planned land uses within the City would contribute to potential damage to cultural and paleontological resources.

B. CUMULATIVE IMPACTS AND MITIGATION MEASURES

Cumulative Impacts to Historical, Archaeological and Paleontological Resources and Human Remains

Impact 4.4.5 Implementation of the proposed Project, in combination with proposed, approved and reasonably foreseeable projects in the City of Calexico, has the potential to result in impacts to historical, archaeological and paleontological resources and human remains. However, impacts to these resources are addressed on a project-by-project basis. Therefore, a **less than cumulatively considerable impact** would occur with regard to historical, archaeological and paleontological resources and human remains.

Cumulative development of proposed, approved and reasonably foreseeable projects in the City of Calexico identified in Table 3.0-1 in Chapter 3.0, Introduction to the Environmental Analysis and Assumptions Used, could result in impacts to historical, archaeological and paleontological resources and human remains. These cumulative effects of development on cultural resources would be addressed on a project-by-project basis. As discussed under Impacts 4.4.2, 4.4.3 and 4.4.4, the presence of archaeological resources, fossil resources and human remains is often unknown. Potential impacts to these resources if present would be mitigated through implementation of mitigation measures MM 4.4.2 (preservation of archaeological resources in place), MM 4.4.3 (spot-checking excavations greater than five feet) and MM 4.4.4 (halting construction within 200 feet of potential human remains discovery).

Cumulative projects with potentially significant impacts to archaeological and historical resources would be required to comply with federal, state, and local regulations and ordinances protecting cultural resources through implementation of similar project-specific mitigation measures during construction. Therefore, through compliance with regulatory requirements, standard conditions of approval, and mitigation measures MM 4.4.2, MM 4.4.3 and MM 4.4.4, the proposed Project would have a **less than cumulatively considerable contribution** to impacts to historical, archaeological and paleontological resources and human remains. Likewise, because individual projects must also comply with applicable regulatory requirements and site-specific mitigation on a project-by-project basis, cumulative impacts to historical, archaeological and paleontological resources and human remains are considered **less than cumulatively considerable**.

Mitigation Measures

Implement mitigation measures MM 4.4.2, MM 4.4.4 and MM 4.4.4.

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Significance After Mitigation

Implementation of project-specific mitigation measures would address potential impacts to historical, archaeological and paleontological resources and human remains through preservation of archaeological resources in place (MM 4.4.2); spot-checking excavations greater than five feet (MM 4.4.3); and halting construction within 200 feet of potential human remains discovery (MM 4.4.4). Therefore, following implementation of these mitigation measures, cumulative impacts associated with historical, archaeological and paleontological resources and human remains would be **less than cumulatively considerable**.

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