

**Section 4.4:**  
**CULTURAL RESOURCES**

**EARVIN "MAGIC" JOHNSON RECREATION AREA MASTER PLAN  
DRAFT ENVIRONMENTAL IMPACT REPORT**

## **4.4 CULTURAL RESOURCES**

This section discusses the environmental setting, existing conditions, regulatory context and potential impacts of the Project Area in relation to cultural and paleontological resources. Cultural resources include places, objects, and settlements that reflect group or individual religious, archaeological, architectural, or paleontological activities. Such resources provide information on scientific progress, environmental adaptations, group ideology, or other human advancements. By statute, the California Environmental Quality Act (CEQA) is primarily concerned with two classes of cultural resources: “historical resources,” which are defined in Public Resources Code Section 21084.1 and CEQA Guidelines Section 15064.5 and “unique archaeological resources,” which are defined in Public Resources Code Section 21083.2. The information and analysis presented in this section is based on the *Cultural Resources Assessment* prepared by BCR Consulting, LLC, on April 30, 2014 (see Appendix C), and the *County of Los Angeles General Plan (1980)*.

### **ENVIRONMENTAL SETTING**

The Project site is an existing urban recreation area, the Earvin “Magic” Johnson (EMJ) Park, surrounded by single-family, multi-family residential developments and commercial uses. The site currently contains two artificial lakes connected by a stream, picnic areas, a playground, and includes walkways, landscaping, irrigation, and a parking lot. Also included in the proposed Project area is the former Ujima Village Apartment Complex (UVA) site, an affordable housing development, as well as the Ujima Housing Corporation (UHC) site. That parcel has since been demolished and/or abandoned and would be redeveloped as part of the proposed Project. Additionally, a utility right-of-way easement (APN 6086031273), owned by the County Department of Water and Power (LACDWP), is also located on the Project site. It presently serves as a utility corridor for overhead electrical transmission lines.

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## PREHISTORIC CULTURAL SETTING

The archeological record is viewed in two general formats. The first defines four cultural horizons, each with characteristic local variations: Early Man Horizon, Milling Stone, Intermediate, and Late Prehistoric. A second, more ecological approach defines five periods in southern California prehistory: Lake Mojave, Pinto, Gypsum, Saratoga Springs, and Protohistoric. The ecological approach views cultural changes as an adaptation to a changing environment.

### *ETHNOGRAPHY*

Although no prehistoric sites have been locally recorded, in general, the Project site is situated within Gabrielino territory.

### GABRIELINO

The Gabrielino probably first encountered Europeans when Spanish explorers reached California's southern coast during the 15th and 16th centuries (Bean and Smith 1978; Kroeber 1925). The first documented encounter, occurred in 1769 when Gaspar de Portola's expedition crossed Gabrielino territory (Bean and Smith 1978). The Gabrielino name has been attributed by association with the Spanish mission of San Gabriel. Gabrielino villages occupied the watersheds of various rivers, including the Santa Ana River, and intermittent streams. Chiefs were usually descended through the male line and often administered several villages. Gabrielino society is thought to have contained three hierarchically ordered social classes which determined ownership rights and social status and obligations (Bean and Smith 1978:540-546). Plants utilized for food were heavily relied upon and included acorn-producing oaks, as well as seed-producing grasses and sage. Animal protein was commonly derived from rabbits and deer in inland regions, while coastal populations supplemented their diets with fish, shellfish, and marine mammals (Boscana 1933, Heizer 1968, Johnston 1962, McCawley 1996).

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*HISTORICAL SETTING*

Historic-era California is generally divided into three periods: the Spanish or Mission Period (1769 to 1821), the Mexican or Rancho Period (1821 to 1848), and the American Period (1848 to present).

SPANISH PERIOD

The first European to pass through the area is thought to be a Spaniard called Father Francisco Garces. Having become familiar with the area, Garces acted as a guide to Juan Bautista de Anza, who had been commissioned to lead a group across the desert from a Spanish outpost in Arizona to set up quarters at the Mission San Gabriel in 1771 near present-day Pasadena (Beck and Haase 1974). Garces was followed by Alta California Governor Pedro Fages, who briefly explored the region in 1772. Searching for San Diego Presidio deserters, Fages had traveled through Riverside to San Bernardino, crossed over the mountains into the Mojave Desert, and then journeyed westward to the San Joaquin Valley (Beck and Haase 1974).

MEXICAN PERIOD

In 1821, Mexico overthrew Spanish rule and the missions began to decline. By 1833, the Mexican government passed the Secularization Act, and the missions, reorganized as parish churches, lost their vast land holdings, and released their new followers (Beattie and Beattie 1974).

AMERICAN PERIOD

The American Period, 1848–Present, began with the Treaty of Guadalupe Hidalgo. In 1850, California was accepted into the Union of the United States primarily due to the population increase created by the Gold Rush of 1849. The cattle industry reached its greatest prosperity during the first years of the American Period. Mexican Period land grants had created large pastoral estates in California, and demand for beef during the Gold Rush led to a cattle boom that lasted from 1849–1855. However, beginning about 1855, the demand for beef began to decline due to imports of sheep from New Mexico and cattle from the Mississippi and Missouri Valleys. When the beef market collapsed, many California ranchers lost their ranchos through foreclosure. A series of disastrous floods in 1861–1862, followed by a significant drought diminished the economic impact

of local ranching. This decline combined with increasing agricultural and real estate developments of the late 19th century, set the stage for a diversified economy that has continued to this day (Beattie and Beattie 1974; Cleland 1941).

## REGULATORY FRAMEWORK

### FEDERAL

#### *ARCHAEOLOGICAL RESOURCES PROTECTION ACT*

The Archaeological Resources Protection Act of 1979 regulates the protection of archeological sites and resources that are on Native American lands or Federal lands.

#### *SECTION 106 FOR THE NATIONAL HISTORICAL PRESERVATION ACT (NHPA) OF 1966*

Federal regulations for cultural resources are governed primarily by Section 106 of the NHPA of 1966. Section 106 of the NHPA requires Federal agencies to take into account the effects of their undertakings on historic properties and affords the Advisory Council on Historic Preservation a reasonable opportunity to comment on such undertakings. The Council's implementing regulations, "Protection of Historic Properties," are found in 36 Code of Federal Regulations (CFR) §800. The goal of the Section 106 review process is to offer a measure of protection to sites, which are determined eligible for listing on the National Register of Historic Places (NRHP). The criteria for determining NRHP eligibility are found in 36 CFR 60. Amendments to the Act (1986 and 1992) and subsequent revisions to the implementing regulations have, among other things, strengthened the provisions for Native American consultation and participation in the Section 106 review process. While Federal agencies must follow Federal regulations, most projects by private developers and landowners do not require this level of compliance. Federal regulations only come into play in the private sector if a project requires a Federal permit or if it uses Federal funding.

#### *NATIONAL REGISTER OF HISTORIC PLACES (NRHP)*

The NRHP is "an authoritative guide to be used by Federal, State, and local governments, private groups, and citizens to identify the Nation's cultural resources and to indicate what properties should be considered for protection from destruction or

impairment." However, the Federal regulations explicitly provide that a listing of private property on the NRHP "does not prohibit under Federal law or regulation any actions which may otherwise be taken by the property owner with respect to the property."

"Historic properties," as defined by the Advisory Council on Historic Preservation, include any "prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the NRHP maintained by the Secretary of the Interior" (36 CFR §800.16(I)). Eligibility for inclusion in the NRHP is determined by applying the following criteria, developed by the National Park Service in accordance with the NHPA:

The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and

1. that are associated with events that have made a significant contribution to the broad patterns of our history; or
2. that are associated with the lives of persons significant in our past; or
3. that embody 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
4. that have yielded, or may be likely to yield, information important in prehistory or history (36 CFR 60.4).

## STATE

State historic preservation regulations affecting the Project include the statutes and guidelines contained in CEQA, Public Resources Code [PRC] §20183.2 and §21084.1 and §15064.5 of CEQA Guidelines. CEQA requires lead agencies to carefully consider the potential effects of a project on historical resources. An "historical resource" includes,

but is not limited to, any object, building, structure, site, area, place, record or manuscript, which is historically or archaeologically significant (PRC §5020.1). Section 15064.5 of the CEQA Guidelines specifies criteria for evaluating the significance or importance of cultural resources, including:

- The resource is associated with events that have made a contribution to the broad patterns of California history;
- The resource is associated with the lives of important persons from our past;
- The resource embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of an important individual or possesses high artistic values; or
- The resource has yielded, or may be likely to yield, important information in prehistory or history.

Advice on procedures to identify such resources, evaluate their importance and estimate potential effects is given in several agency publications such as the series produced by the Governor's Office of Planning and Research (OPR). The technical advice series produced by OPR strongly recommends that Native American concerns and the concerns of other interested persons and corporate entities, including, but not limited to, museums, historical commissions, associates and societies be solicited as part of the process of cultural resources inventory. In addition, California law protects Native American burials, skeletal remains and associated grave goods regardless of the antiquity and provides for the sensitive treatment and disposition of those remains.

#### *SENATE BILL 18*

California Senate Bill (SB) 18, effective September 2004, requires local government to notify and consult with California Native American tribes when the local government is considering adoption or amendment of a general or specific plan. Prior to adoption of a specific plan, a local government must refer the proposed action to those tribes that are on the Native American Heritage Commission contact list and have traditional lands located within the city or county's jurisdiction. The referral must allow a 45-day comment period as per Government Code § 65453.

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*ASSEMBLY BILL 52*

On September 25, 2014 Governor Brown signed Assembly Bill No. 52 (AB 52), which creates a new category of environmental resources that must be considered under the California Environmental Quality Act: "tribal cultural resources." The legislation imposes new requirements for consultation regarding projects that may affect a tribal cultural resource, includes a broad definition of what may be considered to be a tribal cultural resource, and includes a list of recommended mitigation measures.

AB 52 adds tribal cultural resources to the categories of cultural resources in CEQA, which had formerly been limited to historic, archaeological, and paleontological resources. "Tribal cultural resources" are defined as either (1) "sites, features, places cultural landscapes, sacred places and objects with cultural value to a California Native American tribe" that are included in the state register of historical resources or a local register of historical resources, or that are determined to be eligible for inclusion in the state register; or (2) resources determined by the lead agency, in its discretion, to be significant based on the criteria for listing in the state register.

*CALIFORNIA REGISTER OF HISTORICAL RESOURCES (CRHR)*

In 1992, the Governor signed Assembly Bill (AB) 2881 into law, establishing the California Register of Historical Resources (CRHR). The CRHR is an authoritative guide in California used by State and local agencies, private groups, and citizens to identify the State's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change. The criteria for eligibility for the CRHR are based upon NRHP criteria. Certain resources are determined by the statute to be included on the CRHR, including California properties formally determined eligible for, or listed in, the NRHP, State Landmarks, and State Points of Interest.

The State Office of Historic Preservation (OHP) has broad authority under Federal and State law for the implementation of historic preservation programs in the State of California. The State Historic Preservation Officer (SHPO) makes determinations of eligibility for listing on the NRHP and the CRHR.



The appropriate standard for evaluating "substantial adverse effect" is defined in PRC §5020.1(q) and 21084.1. Substantial adverse change means demolition, destruction, relocation, or alteration such that the significance of an historical resource would be impaired. Such impairment of significance would be an adverse impact on the environment.

Cultural resources consist of buildings, structures, objects, or archeological sites. Each of these entities may have historic, architectural, archaeological, cultural, or scientific importance. Under CEQA Guidelines, a significant impact would result if the significance of a cultural resource would be changed by project area activities. Activities that could potentially result in a significant impact consist of demolition, replacement, substantial alteration, and relocation of the resource. The significance of a resource is required to be determined prior to analysis of the level of significance of project activities. The steps required to be implemented to determine significance in order to comply with CEQA Guidelines are:

- Identify cultural resources;
- Evaluate the significance of the cultural resources based on established thresholds of significance;
- Evaluate the effects of a project on all cultural resources; and
- Develop and implement measures to mitigate the effects of the project on significant cultural resources.

Sections 6253, 6254, and 6254.10 of the California Code authorize State agencies to exclude archaeological site information from public disclosure under the Public Records Act. In addition, the California Public Records Act (CPRA; Government Code [GC] §6250 et. seq.) and California's open meeting laws (The Brown Act, GC §54950 et. seq.) protect the confidentiality of Native American cultural place information. The CPRA (as amended, 2005) contains two exemptions that aid in the protection of records relating to Native American cultural places by permitting any state or local agency to deny a CPRA request and withhold from public disclosure:

- "records of Native American graves, cemeteries, and sacred places and records of Native American places, features, and objects described in §5097.9 and §5097.993 of the Public Resources Code maintained by, or in the possession of, the Native American Heritage Commission, another state agency, or a local agency" (GC §6254(r)); and
- "records that relate to archaeological site information and reports maintained by, or in the possession of, the Department of Parks and Recreation, the State Historical Resources Commission, the State Lands Commission, another state agency, or a local agency, including the records that the agency obtains through a consultation process between a California Native American tribe and a state or local agency" (GC §6254.10).

Likewise, the Information Centers of the California Historical Resources Information System (CHRIS) maintained by the OHP prohibit public dissemination of records and site location information. In compliance with these requirements, and those of the Code of Ethics of the Society for California Archaeology and the Register of Professional Archaeologists, the locations of cultural resources are considered restricted information with highly restricted distribution and are not publicly accessible.

Any project site located on non-Federal land in California is also required to comply with State laws pertaining to the inadvertent discovery of Native American human remains.

*CALIFORNIA HEALTH AND SAFETY CODE §7050.5, §7051, AND §7054*

California Health and Safety Code §7050.5, §7051, and §7054 collectively address the illegality of interference with human burial remains as well as the disposition of Native American burials in archaeological sites. The law protects such remains from disturbance, vandalism, or inadvertent destruction, and establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project, including the treatment of remains prior to, during, and after evaluation, and reburial procedures.

## LOCAL

### *LOS ANGELES COUNTY REGULATIONS*

The Los Angeles County Historical Landmarks and Records Commission is the acting local legislative body that reviews and recommends cultural heritage resources in the unincorporated areas for inclusion in the State Historic Resources Inventory. Cultural and historic sites or resources listed in the national, state, or local registers maintained by the County of Los Angeles (County) are protected through the County General Plan policies and regulations restricting alteration, relocation, and demolition of historical resources. Under Titles 21 (Subdivisions) and 22 (Planning and Zoning) of the County Code, all zoning ordinances, zone changes, subdivisions, capital improvement plans, and public works projects shall be consistent with the General Plan—this includes all cultural and historical sites and resources.

### *LOS ANGELES GENERAL PLAN GOALS AND POLICES*

#### Conservation and Open Space Element

**Objective** To preserve and protect sites of historical, archaeological, scenic and scientific value.

#### *Protect cultural heritage resources*

Our culture heritage is non-renewable and irreplaceable. These resources must be identified and protected. Public awareness and use of these resources should be encouraged.

**Policy 17** Protect cultural heritage resources including historical, archaeological, paleontological and geological sites, and significant architectural structures.

**Policy 18** Encourage public use of cultural heritage sites consistent with the protection of these resources.

**Policy 19** Promote public awareness of cultural resources.

**Policy 20** Encourage private owners to protect cultural heritage resources.

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## IMPACT ANALYSIS AND MITIGATION MEASURES

### METHODOLOGY

#### *RESEARCH*

An archaeological records search was conducted at the South Central Coastal Information Center (SCCIC). This included a review of all recorded historic and prehistoric cultural resources, as well as a review of known cultural resources, and survey and excavation reports generated from projects located within one mile of the Project site. In addition, a review was conducted of the National Register of Historic Places (National Register), the California Register of Historical Resources (California Register), and documents and inventories from the California Office of Historic Preservation including the lists of California Historical Landmarks, California Points of Historical Interest, Listing of National Register Properties, and the Inventory of Historic Structures.

#### *FIELD SURVEY*

An archaeological pedestrian field survey of the Project site was conducted on April 25, 2014. The survey was conducted by walking parallel transects spaced approximately 20 meters apart across 100 percent of the accessible Project site. Soil exposures, including natural and artificial clearings, were carefully inspected for evidence of cultural resources.

#### *RESEARCH RESULTS*

Data from the SCCIC revealed that 47 cultural resources studies have taken place resulting in the recording of 10 cultural resources (all historic-period) within one mile of the Project site. Of the 47 previous studies, two have previously assessed portions of the Project site resulting in no cultural resources recorded within its boundaries. Table 4.4-1 summarizes the records search results.

**Table 4.4-1**

**Cultural Resources and Reports Located Within One Mile of the Project Site**

USGS 7.5 Minute Quadrangle	Cultural Resources Within One Mile of Project Site	Studies Within One Mile of Project Site
<i>Inglewood, California</i> (1981)	P-19-173599, 174576, 171686, 171687, 171688, 175276, 187501, 187502, 187503	LA-78, 1111*, 1290, 2950, 3320, 4224, 4517, 4836, 6026, 6235, 6820, 6877, 7407, 7413, 7685, 7693, 8255, 8774, 9130, 9514, 9814*, 10193, 10567, 11150, 11705, 12274, 12275
<i>South Gate, California</i> (1981)	P-19-190281	LA-78, 2877, 2950, 3202, 3738, 4009, 4144, 4542, 4571, 4836, 4980, 5571, 5573, 5944, 5958, 6226, 7044, 7641, 7927, 8237, 8255, 9188, 9901, 10624

*FIELD SURVEY RESULTS*

During the field survey, BCR Consulting personnel carefully inspected the Project site, and identified no cultural resources within its boundaries. The majority of the Project site exhibited surface visibility of less than 10 percent, although areas around soccer fields, picnic tables, and around trees averaged over 90 percent visibility. Severe disturbances resulting from landscaping and construction of playgrounds, paved walkways, parking lots, and lakes have rendered any evidence of naturally occurring sediments and vegetation negligible.

**THRESHOLDS OF SIGNIFICANCE**

The following thresholds of significance are based on CEQA Guidelines Appendix G. For purposes of this Draft EIR, implementation of the Project would be considered to have a significant impact on cultural resources if it would do any of the following:

- Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5;
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5;
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, or contain rock formations indicating potential paleontological resources;

- Disturb any human remains, including those interred outside of formal cemeteries.

## PROJECT IMPACTS AND MITIGATION

<i>Threshold:</i>	<i>Would the Project cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5?</i>
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**Impact 4.4-1**      **Implementation of the Project would not cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5. This impact would be less than significant with mitigation incorporated.**

The proposed Project would redevelop a 120-acre urban area into a regional community park complete with equestrian facilities, recreational lakes, operations and maintenance facilities, and passive recreation facilities. Much of the Project area is currently an existing park with some acreage coming from the former UVA site. All development taking place as part of the proposed Project would occur on land that has been disturbed several times throughout its development history.

The *Cultural Resources Assessment* conducted by BCR Consulting was completed pursuant to CEQA. The records search and field survey did not identify any historic resources within the Project site. Because no known historical resources exist on the Project site, less than significant impacts would occur and no additional cultural resources work or monitoring is necessary during construction or operation of the proposed Project. However, Mitigation Measure CUL-1 would be applied in the event that previously undocumented cultural resources are identified during earthmoving activities.

**MM CUL-1**      *Should a significant historical or archaeological resource(s) be discovered on the property, ground disturbing activities shall be suspended 100 feet around the resource(s). The Project archeologist and a representative of the appropriate Native American Tribe(s) (when necessary), and the County shall confer regarding mitigation of the discovered resource(s). A*

*treatment plan shall be prepared and implemented by the archaeologist to protect the identified historical or archaeological resource(s) from damage and destruction. Any recovered historical or archaeological resources shall be processed and curated according to current professional repository standards as appropriate. The collections and associated records shall be donated to an appropriate curation facility, or, the artifacts may be delivered to the appropriate Native American Tribe(s) if that is recommended by the County. A final report containing the significance and treatment findings shall be prepared by the archaeologist and submitted to the County.*

<i>Threshold:</i>	<i>Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?</i>
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**Impact 4.4-2**      **Implementation of the Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5. This impact would be *less than significant with mitigation incorporated.***

As discussed in Impact 4.4-1 above, the proposed Project would be constructed and operated on land that has been disturbed several times throughout its development history. A cultural resources records search did not reveal the presence of any known archeological resources within the Project area. Because no known archeological resources exist on the Project site, less than significant impacts would occur and no additional cultural resources work or monitoring is necessary during construction or operation of the proposed Project. However, Mitigation Measure CUL-1 would be applied in the event previously undocumented cultural resources are identified during earthmoving activities.

*Threshold: Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, or contain rock formations indicating potential paleontological resources?*

**Impact 4.4-3**      **Implementation of the Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, or contain rock formations indicating potential paleontological resources. This impact would be *less than significant with mitigation incorporated.***

The proposed Project would be constructed and operated on land that has been disturbed several times throughout its development history. A cultural resources records search did not reveal the presence of any known paleontological resources within the Project area. Because no known paleontological resources exist on the Project site, less than significant impacts would occur and no additional paleontological resources work or monitoring is necessary during construction or operation of the proposed Project. However, Mitigation Measure CUL-2 would be applied in the event previously undocumented paleontological resources are identified during earthmoving activities.

**MM CUL-2**      *Should paleontological resource(s) be discovered on the property, ground disturbing activities shall be suspended 100 feet around the resource(s). The Project paleontologist and the County shall confer regarding mitigation of the discovered resource(s). A treatment plan shall be prepared and implemented by the paleontologist to protect the identified historical or archaeological resource(s) from damage and destruction. Any recovered paleontological resources shall be processed and curated according to current professional repository standards as appropriate. The collections and associated records shall be donated to an appropriate curation facility. A final report containing the significance and treatment findings shall be prepared by the paleontologist and submitted to the County.*



<i>Threshold:</i>	<i>Would the Project disturb any human remains, including those interred outside of formal cemeteries?</i>
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**Impact 4.4-4**      **Implementation of the Project would not disturb any human remains, including those interred outside of formal cemeteries. This impact would be *less than significant*.**

The Project proposes to redevelop EMJ Park and selected adjacent properties into a redesigned urban park with a variety of features including equestrian facilities, operations and maintenance yard, one or two parking structures, and recreational lakes. Implementation of the proposed facilities would require earth moving activities that have the potential to disturb unknown human remains. Should human remains be encountered during the course of implementation of the proposed Project, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC. Through compliance with State Health and Safety Code Section 7050.5, no additional mitigation is necessary and potential impacts to human remains would be less than significant.

## CUMULATIVE IMPACTS

The cumulative effect of projects located in the County would have the potential to result in the loss of historical resources through the physical demolition, destruction, relocation, or alteration of a resource or its immediate surroundings such that the significance of a cultural resource would be materially impaired. Projects in the County are regulated by Federal, State, and local regulations as discussed the regulatory section of this chapter. Specifically, these regulations include the Mills Act, PRC Section 5097, State Health and Safety Code 18950-1896, and the Secretary of the Interior's Standards

for Rehabilitation and Standards for the Treatment of Historic Properties. Because the Project does not have a significant and unavoidable impact on cultural resources, and because the Project and other cumulative projects in the County would be required to comply with the above mentioned regulations, the proposed Project, in combination with cumulative projects, would have a less than significant cumulative impact on cultural resources.

In the event of an unanticipated discovery of historic, archeological, or paleontological resources during construction of the proposed Project, Mitigation Measures CUL-1 and CUL-2 ensure that impacts would be mitigated to a less than significant level. Public Resources Code and the California Health and Safety Code mandate the process of how to handle the discovery of any human remains and would reduce impacts to a less than significant level.

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