3.5 - Cultural Resources

3.5.1 - Introduction

This section describes the existing cultural resources setting and potential effects from project implementation on the site and its surrounding area that are based on record searches at the North Central Information Center, the Native American Heritage Commission as well as a pedestrian survey conducted within the project boundaries. The Cultural Resource Assessment memorandum prepared for proposed project is provided in Appendix E.

3.5.2 - Environmental Setting

Overview

The term "cultural resources" encompasses historic, archaeological, and paleontological resources, and burial sites. Below is a brief summary of each component:

- **Historic Resources:** Historic resources are associated with the recent past. In California, historic resources are typically associated with the Spanish, Mexican, and American periods in the State's history and are generally less than 200 years old.
- **Archaeological Resources:** Archaeology is the study of prehistoric human activities and cultures. Archaeological resources are generally associated with indigenous cultures.
- **Paleontological Resources:** Paleontology is the study of plant and animal fossils.
- **Burial Sites:** Burial sites are formal or informal locations where human remains, usually associated with indigenous cultures, are interred.

Cultural Setting

The following is a brief overview of the prehistory, ethnography, and historic background, providing a context in which to understand the background and relevance of sites found in the general project area. This section is not intended to be a comprehensive review of the current resources available; rather, it serves as a general overview.

Further details can be found in ethnographic studies, mission records, and major published sources, including Beardsley (1948), Bennyhoff (1950), Fredrickson (1973 and 1974), Kroeber (1925), Chartkoff and Chartkoff (1984), and Moratto (1984).

3.5.3 - Prehistoric Background

Early archaeological investigations in central California were conducted at sites located in the Sacramento-San Joaquin Delta region. The first published account documents investigations in the Lodi and Stockton area (Schenck and Dawson 1929). The initial archaeological reports typically contained descriptive narratives, with more systematic approaches sponsored by Sacramento Junior College in the 1930s. At the same time, University of California at Berkeley excavated several sites

in the lower Sacramento Valley and Delta region, which resulted in recognizing archaeological site patterns based on variations of inter-site assemblages.

Research during the 1930s identified temporal periods in central California prehistory and provided an initial chronological sequence (Lillard and Purves 1936; Lillard, et al. 1939). Three Periods were defined (Early, Transitional, and Late) which were later designated as Horizons (Heizer and Fenenga 1939). In 1939, Lillard noted that each cultural period led directly to the next and that influences spread from the Delta region to other regions in central California (Lillard, et al. 1939). In the late 1940s and early 1950s, Beardsley documented similarities in artifacts among sites in the San Francisco Bay region and the Delta and refined his findings into a cultural model that ultimately became know as the Central California Taxonomic System (CCTS). This system proposed a uniform, linear sequence of cultural succession (Beardsley 1948 and 1954). The CCTS system was challenged by Gerow, whose work looked at radiocarbon dating to show that Early and Middle Horizon sites were not subsequent developments but, at least partially, contemporaneous (1954; 1974; Gerow with Force 1968).

To address some of the flaws in the CCTS system, Fredrickson (1973) introduced a revision that incorporated a system of spatial and cultural integrative units. Fredrickson separated cultural, temporal, and spatial units from each other and assigned them to six chronological periods: Paleo-Indian (10000 to 6000 B.C.); Lower, Middle and Upper Archaic (6000 B.C. to A.D. 500), and Emergent (Upper and Lower, A.D. 500 to 1800). The suggested temporal ranges are similar to earlier horizons, which are broad cultural units that can be arranged in a temporal sequence (Moratto 1984). In addition, Fredrickson defined several patterns—a general way of life shared within a specific geographical region. These patterns include:

- Windmiller Pattern or Early Horizon (3000 to 1000 B.C.)
- Berkeley Pattern or Middle Horizon (1000 B.C. to A.D. 500)
- Augustine Pattern or Late Horizon (A.D. 500 to historic period)

Brief descriptions of these temporal ranges and their unique characteristics follow.

3.5.4 - Windmiller Pattern or Early Horizon (3000 to 1000 B.C.)

Characterized by the Windmiller Pattern, the Early Horizon was centered in the Cosumnes district of the Delta and emphasized hunting rather than gathering, as evidenced by the abundance of projectile points in relation to plant processing tools. Additionally, atlatl, dart, and spear technologies typically included stemmed projectile points of slate and chert but minimal obsidian. The large variety of projectile point types and faunal remains suggests exploitation of numerous types of terrestrial and aquatic species (Bennyhoff 1950; Ragir 1972). Burials occurred in cemeteries and intra-village graves. These burials typically were ventrally extended, although some dorsal extensions are known with a westerly orientation and a high number of grave goods. Trade networks focused on acquisition of ornamental and ceremonial objects in finished form rather than on raw material. The presence of

artifacts made of exotic materials such as quartz, obsidian, and shell indicates an extensive trade network that may represent the arrival of Utian populations into central California. Also indicative of this period are rectangular Haliotis and Olivella shell beads, and charmstones that usually were perforated.

3.5.5 - Berkeley Pattern or Middle Horizon (1000 B.C. to A.D. 500)

The Middle Horizon is characterized by the Berkeley Pattern, which displays considerable changes from the Early Horizon. This period exhibited a strong milling technology represented by minimally shaped cobble mortars and pestles, although metates and manos were still used. Dart and atlatl technologies during this period were characterized by non-stemmed projectile points made primarily of obsidian. Fredrickson (1973) suggests that the Berkeley Pattern marked the eastward expansion of Miwok groups from the San Francisco Bay Area. Compared with the Early Horizon, there is a higher proportion of grinding implements at this time, implying an emphasis on plant resources rather than on hunting. Typical burials occurred within the village with flexed positions, variable cardinal orientation, and some cremations. As noted by Lillard, the practice of spreading ground ochre over the burial was common at this time (Lillard, et al. 1939). Grave goods during this period are generally sparse and typically include only utilitarian items and a few ornamental objects. However, objects such as charmstones, quartz crystals, and bone whistles occasionally were present, which suggest the religious or ceremonial significance of the individual (Hughes 1994). During this period, larger populations are suggested by the number and depth of sites compared with the Windmiller Pattern. According to Fredrickson (1973), the Berkeley Pattern reflects gradual expansion or assimilation of different populations rather than sudden population replacement and a gradual shift in economic emphasis.

3.5.6 - Augustine Pattern or Late Horizon (A.D. 500 to Historic Period)

The Late Horizon is characterized by the Augustine Pattern, which represents a shift in the general subsistence pattern. Changes include the introduction of bow and arrow technology; and most importantly, acorns became the predominant food resource. Trade systems expanded to include raw resources as well as finished products. There are more baked clay artifacts and extensive use of *Haliotis* ornaments of many elaborate shapes and forms. Burial patterns retained the use of flexed burials with variable orientation, but there was a reduction in the use of ochre and widespread evidence of cremation (Moratto 1984). Judging from the number and types of grave goods associated with the two types of burials, cremation seems to have been reserved for individuals of higher status, whereas other individuals were buried in flexed positions. Johnson (1976) suggests that the Augustine Pattern represents expansion of the Wintuan population from the north, which resulted in combining new traits with those established during the Berkeley Pattern.

Central California research has expanded from an emphasis on defining chronological and cultural units to a more comprehensive look at settlement and subsistence systems. This shift is illustrated by the early use of burials to identify mortuary assemblages and more recent research using osteological

data to understand the health of prehistoric populations rather than only using burials to identify mortuary assemblages (Dickel et al. 1984). Although debate continues over a single model or sequence for central California, the general framework consisting of three temporal/cultural units is generally accepted, although the identification of regional and local variation is a major goal of current archaeological research.

A good synopsis of San Joaquin and Central Valley prehistory can be found in Fagan (2003), who does not utilize the conceptual *Horizon*-based paradigms set forth by previous archaeologists. Unfortunately, archaeological work in the southern San Joaquin Valley has been limited and the cultural sequence for the lower reaches of the Valley is not confirmed by good radiometric dating. In relatively recent times, a four-part sequence has been proposed. In very general terms, the current and most common archaeological sequences (see Parr and Osbourne 1992, Moratto 1984, Walker 1947, and Wedel 1941) are associated with increasing complexity, population growth, and an increase in environmental desiccation:

- **Paleo-Indian to 9000 B.C.** – The first native use of the area and unique flaked stone tools linked to big-game hunting with few millingstones.
- **Proto-Archaic to 7000 B.C.** – Increasing sedentism with shifting emphasis on smaller game as well as an increase in plant foodstuff utilization and more grinding implements in the tool kit.
- **Archaic to 3000 B.C.** – Ever more increasing sedentism and utilization of plant foods such as acorns and other seeds.
- **Post-Archaic from 3000 B.C. to the present** – Extensive diversity of California groups through the historic era.

It is clear that early sites may not exhibit the complexity of later sites simply because such sites are rare and have been lost to erosion and the plow. The periods noted above are as much a function of site preservation as a reflection of the assumptive procedures prehistoric Californians may have used to survive. Fagan shows (2003) that Penutian speakers expanded southward into the Central Valley around A.D. 1000 and were likely the ancestors of the Yokuts.

The lakes of the southern San Joaquin Valley have attracted human settlements since entering California approximately 18,000 years ago. The earliest evidence along Buena Vista Lake is in the form of a radiocarbon date of stone tools associated with big-game butchering. The Valley once exhibited marshes and aquatic flora of extreme density. Although temperatures hover over 100 degrees in the summer, the marshes were always filled with animals, fish, birds, and other edible resources. Tulare Lake, when first mapped, was considered to cover about 680 square miles and at maximum the waters edge would have been at an altitude about 210 to 215 feet above sea level (Preston 1981).

Native American Background

At the time of European contact, the project vicinity was occupied by the Patwin tribe of the Native Americans. The Patwin occupied the southwestern Sacramento Valley from the town of Princeton, north of Colusa, south to San Pablo and Suisun bays, and from the lower hills of the eastern North Coast Ranges to the Sacramento River. Patwin territory extended approximately 40 miles east to west and 90 miles north to south. Based primarily on linguistic variation, the Patwin are the most southern division of the Wintuan population, who are members of the Penutian linguistic stock. Distinction is made between the Hill and River Patwin. Hill Patwin had villages located in valleys along the hills of the Vaca Mountains and Coast Ranges with populations concentrated in the Indian, Bear, Capay, Cortina, Long, and Napa valleys. In general, the River Patwin occupied the west banks of the lower Sacramento River below the Feather River as well as the lower reaches of Cache and Putah creeks in the Sacramento Valley (Cook 1976; Johnson 1978). The Patwin political organization was centered on the tribelet, which consisted of a primary village with smaller satellite villages governed by a chief. Tribelets were autonomous and differed from each other with minor cultural variations. The economic and ceremonial activities of each village were administered by a chief whose position was typically passed on patrilineally, although some chiefs were chosen by village elders. The chief administered subsistence ventures, such as hunting and gathering expeditions, and served as the primary resource distributor (Johnson 1978).

The Hill Patwin subsistence base varied seasonally and included gathering seeds and plant resources on the plains, netting migratory waterfowl in the tule marshes, and netting salmon and other fish in the rivers and streams. Acorns were a staple in the Patwin diet and were obtained from communally owned hill and valley oak groves (Johnson 1978). The Patwin typically stored the acorns in granaries as insurance against famine in poor harvest years. Ethnographic reports indicate the Patwin obtained large game such as deer, tule elk, and antelope, by using nets or shooting with bows and arrows.

The Hill Patwin trade system included various resources that were exchanged with Wappo, Nomlaki, and Southeastern Pomo, and the River Patwin. The River Patwin obtained obsidian from sources to the west and east. Initially, finished shell beads were obtained from coastal tribes, but later, the River Patwin traded for whole shells from the Pacific Coast and produced the beads themselves (Johnson 1978). Relationships with nearby tribes as well as other Patwin tribelets were not always friendly. Johnson notes that relations were strained especially with Napa Valley groups and that the provocations primarily consisted of poaching, with the subsequent retaliations consisting of organized battles on individuals or groups or surprise attacks on villages (Johnson 1978).

Patwin mortuary practices included burials in cemeteries located at one end of the village, possessions of the deceased being buried along with them, and at some locations, property was burned near the grave. Typically, only people who died away from the village were cremated (Johnson 1978). Johnson notes that according to a Hill Patwin informant “the River people [Patwin] set a corpse upright, then pushed the head down, broke the back, wrapped the body in a skin, and put it in the

grave" (Johnson 1978). In addition, long burial ropes constructed of hemp were wrapped around the deceased and temporary containers made of tule reeds were utilized for transport (Johnson 1978).

Spanish Exploration and Settlement

Spanish exploration into the Central Valley dates back to the late 1700s. Spanish mission records indicate that by 1800, Patwin inhabitants at Aguastos, the south-central area, and other villages were being taken to Mission Dolores (San Francisco de Asis), and that Mission Sonoma (San Francisco Solano), built in 1823, was baptizing Patwin tribal members until secularization of the missions in 1832-1836. Many Native Americans were not willing converts. There are numerous accounts of neophytes fleeing the missions, and a series of "Indian Wars" broke out when the Spanish tried to return them to the missions (Johnson 1978).

The Mexican Period

With the declaration of Mexican independence in 1821, Spanish control of Alta California ended, although little change actually occurred. Political change did not take place until mission secularization in 1834, when Native Americans were released from missionary control and the mission lands were granted to private individuals. Shoup and Milliken (1999) state that mission secularization removed the social protection and support on which Native Americans had come to rely. It exposed them to further exploitation by outside interests, often forcing them into a marginal existence as laborers for large ranchos. Following mission secularization, the Mexican population grew as the native population continued to decline. Anglo-American settlers began to arrive in Alta California during this period and often married into Mexican families, becoming Mexican citizens, which made them eligible to receive land grants. In 1846, on the eve of the U.S.-Mexican War (1846 to 1848), the estimated population of Alta California was 8,000 non-natives and 10,000 natives. However, these estimates have been debated. Cook (1976) suggests the Native American population was 100,000 in 1850; the U.S. Census of 1880 reports the Native American population as 20,385.

During this period, General Mariano Guadalupe Vallejo assumed authority of Sonoma Mission and established a friendly relationship with the Native Americans who were living there. In particular, Vallejo worked closely with Chief Solano, a Patwin who served as Vallejo's spokesperson when problems with Native American tribes arose. In 1843, Governor Manuel Micheltorena gave General Vallejo the 84,000 acre Soscoe land grant of Rancho Suscolto, which included present-day Vallejo.

Euro-American Expansion

During this period, and prior, Native American populations were declining rapidly because of an influx of Euro-American diseases. In 1832, a party of trappers from the Hudson's Bay Company, led by John Work, traveled down the Sacramento River, unintentionally spreading a malaria epidemic to Native Californians. Four years later, a smallpox epidemic decimated local populations, and it is estimated that up to 75 percent of the native population died (Cook 1955).

After the upheaval of the Bear Flag Revolt in 1846, and the result of the Treaty of Guadalupe Hidalgo in 1848, California became a United States territory. In 1848, James W. Marshall discovered gold at Coloma in modern-day El Dorado County, which started the gold rush into the region that forever altered the course of California's history. The arrival of thousands of gold seekers in the territory contributed to the exploration and settlement of the entire State. By late 1848, approximately four out of five men in California were gold miners.

The gold rush originated along the reaches of the American River and other tributaries to the Sacramento River, and Hangtown, present-day Placerville, became the closest town offering mining supplies and other necessities for the miners in El Dorado County. Gold subsequently was found in the tributaries to the San Joaquin River, which flowed north to join the Sacramento River in the great delta east of San Francisco Bay.

By 1864, California's gold rush had essentially ended. The rich surface and river placers were largely exhausted and the miners either returned to their homelands or stayed to start new lives in California. After the gold rush, people in towns such as Jackson, Placerville, and Sonora turned to other means of commerce, such as ranching, agriculture, and timber production. With the decline of gold mining, agriculture and ranching came to the forefront in the State's economy. California's natural resources and moderate climate proved well suited for cultivation of a variety of fruits, nuts, vegetables, and grains.

Historic Background

Yolo County was one of the original 27 counties when California became a state in 1850. Originally, Yolo County was almost double its current size, since it included a large portion of present day Colusa County. In the mid-1920s, the county boundaries were redrawn to their current configuration. At one time, a majority of the County was covered with fields of tule rushes, as well as swamplands, marshes, and sloughs. Immigration and settlement in Yolo County began relatively early in California's history and spiked with the influx of miners during the Gold Rush.

The Gold Rush transformed Yolo County from a farming community to a prosperous agricultural region, when the gold miners realized they could make their fortunes by farming and ranching rather than gold prospecting. Yolo County records estimate the population in 1850 to be 1,080 people and by 1870 the population had grown to 9,900. The population expansion was predominantly in the western and central portions of the County near Putah and Cache Creeks. Early interior settlements were located along the main road from Benicia to present-day Winters, adjacent to Putah Creek.

Local conditions in the County were ideal for raising livestock but floods and droughts forced the ranchers to turn increasingly to agricultural crops. The fertile soil, enriched from centuries of runoff and sedimentation from coastal mountains and flooding from the Sacramento River, was especially conducive to growing crops. In addition, Putah Creek, Cache Creek, and the Sacramento River provided plentiful water for irrigation.

The turn of the 20th century brought many agricultural changes to the County. Irrigation improvements introduced new crops such as rice and nut trees to the area. Commercial enterprises related to livestock and agriculture, such as rice mills, dried fruit companies, and vegetable and fruit-packing plants led to further growth in the region. Agricultural endeavors continued to grow within the County, spurred on by massive flood control efforts and the conversion of thousands of acres of swampland into agricultural fields. Large agricultural companies such as Holland Land Company of Clarksburg and River Garden Farms of Knights Landing developed large farms that revitalize many small communities. At the end of World War II, technological advancements revolutionized crop planting and rotation, irrigation, cultivation, harvesting, and transportation and mechanized farm equipment resulted in increased production and profits.

Although the majority of Yolo County retained its agricultural economic base, other areas such as Woodland, Davis, and West Sacramento areas were increasingly urbanized during the 20th century. The City of Davis continues to expand, which is due in large part to the University of California campus. Woodland, as the County seat, is home to a thriving agribusiness with various industrial centers.

Local History

Davis

Joseph Chiles acquired approximately 4,200 acres of the Rancho Laguna de Santo Calle in 1850, and later divided it between his sons-in-law Jerome Davis and Gabriel Brown. Large ranches producing grains crops, fruits, and nuts, livestock and dairy products developed in the area and led to a rapid population increase. The small farming community known as the Putah Township experienced major growth and became a commercial center when the California Pacific Railroad established Davisville as a new junction. In 1906, the University of California purchased Jerome Davis's 780-acre farm that functioned as part of the university's College of Agriculture. The Davis farm evolved into a separate campus of the University of California and is now a world-renowned agricultural research and education facility.

Woodland

One of the earliest known settlers was "Uncle Johnny" Morris, a native of Kentucky, who settled in the Woodland area in 1849. Other settlers followed and established farms and livestock operations in the area, and by 1862 Woodland was designated the permanent County seat. Following the completion of the railroad in 1869, Woodland was incorporated and quickly became a leading commercial and financial center. During the early 1900s, agricultural industries flourished; by the 1930s, Woodland had commercial facilities that included fruit canneries, rice mills, a sugar refinery, and farm machinery industries. Woodland continued to grow rapidly throughout the 1960s, and following the construction of Interstate 5, the City expanded the northeastern section of town to include various types of industrial plants and distribution centers.

3.5.7 - Regulatory Framework

Federal

National Historic Preservation Act

The National Historic Preservation Act of 1966 (NHPA), as amended, established the National Register of Historic Places (NRHP), which contains an inventory of the nation's significant prehistoric and historic properties. Under 36 CFR 60, a property is recommended for possible inclusion on the NRHP if it is at least 50 years old, has integrity, and meets one of the following criteria:

- It is associated with significant events in history, or broad patterns of events.
- It is associated with significant people in the past.
- It embodies the distinctive characteristics of an architectural type, period, or method of construction; or it is the work of a master or possesses high artistic value; or it represents a significant and distinguishable entity whose components may lack individual distinction.
- It has yielded, or may yield, information important in history or prehistory.

Certain types of properties are usually excluded from consideration for listing in the NRHP, but they can be considered if they meet special requirements in addition to meeting the criteria listed above. Such properties include religious sites, relocated properties, graves and cemeteries, reconstructed properties, commemorative properties, and properties that have achieved significance within the past 50 years.

State

California Register of Historical Resources

As defined by Section 15064.5(a)(3)(A-D) of the CEQA Guidelines, a resource shall be considered historically significant if the resource meets the criteria for listing on the California Register of Historical Resources (CR). The California Register of Historical Resources and many local preservation ordinances have employed the criteria for eligibility to the NRHP as a model, since the NHPA provides the highest standard for evaluating the significance of historic resources. A resource that meets the NRHP criteria is clearly significant. In addition, a resource that does not meet the NRHP standards may still be considered historically significant at a local or state level.

California Environmental Quality Act

The CEQA Guidelines state that a resource need not be listed on any register to be found historically significant. The CEQA guidelines direct lead agencies to evaluate archaeological sites to determine if they meet the criteria for listing in the California Register. If an archaeological site is a historical resource, in that it is listed or eligible for listing in the California Register, potential adverse impacts to it must be considered. If an archaeological site is considered not to be an historical resource but

meets the definition of a "unique archeological resource" as defined in Public Resources Code Section 21083.2, then it would be treated in accordance with the provisions of that section.

Local

Yolo County

General Plan

The General Plan establishes the following goals and policies related to cultural resources that are applicable to the proposed project:

- **Policy CC-4.11:** Require site specific information appropriate to each application to enable informed decision-making, including but not limited to the following: biological resources assessment, noise analysis, traffic and circulation assessment, air quality calculations (including greenhouse gases), cultural resources assessment, geotechnical study, Phase One environmental site assessment, title report, storm drainage analysis, flood risk analysis, water supply assessment, sewer/septic capacity and service analysis and fiscal impact analysis.
- **Policy CC-1.5:** Significant site features, such as trees, water courses, rock outcroppings, historic structures and scenic views shall be used to guide site planning and design in new development. Where possible, these features shall become focal points of the development.
- **Policy CC-1.15:** The following features shall be protected and preserved along designated scenic roadways and routes, except where there are health and safety concerns:
  - (1) Trees and other natural or unique vegetation
  - (2) Landforms and natural or unique features
  - (3) Views and vistas
  - (4) Historic structures (where feasible), including buildings, bridges and signs
- **Policy CC-1.17:** Existing trees and vegetation and natural landforms along scenic roadways and routes shall be retained to the greatest feasible extent. Landscaping shall be required to enhance scenic qualities and/or screen unsightly views and shall emphasize the use of native plants and habitat restoration to the extent possible. Removal of trees, particularly those with scenic and/or historic value, shall be generally prohibited along the roadway or route.
- **Policy CO-2.22:** Prohibit development within a minimum of 100 feet from the top of banks for all lakes, perennial ponds, rivers, creeks, sloughs, and perennial streams. The setback will allow for fire and flood protection, a natural riparian corridor (or wetland vegetation), a planned recreational trail where applicable, and vegetated landscape for stormwater to pass through before it enters the water body. Exceptions to this action include irrigation pumps, roads and bridges, levees, docks, boat ramps, and similar uses.
- **Policy CO-4.1:** Identify and safeguard important cultural resources.
- **Policy CO-4.2:** Implement the provisions of the State Historical Building Code and Uniform Code for Building Conservation to balance the requirements of the Americans with Disabilities Act with preserving the architectural integrity of historic buildings and structures.

- **Policy CO-4.3:** Encourage owners of historic resources to preserve and rehabilitate their properties.
- **Policy CO-4.4:** Encourage historic resources to remain in their original use whenever possible. The adaptive use of historic resources is preferred when the original use can no longer be sustained. Older residences may be converted to office/retail use in commercial areas and to tourist use in agricultural areas, so long as their historical authenticity is maintained or enhanced.
- **Policy CO-4.5:** Increase knowledge of historic preservation through public education and outreach programs.
- **Policy CO-4.6:** Support historically oriented visitor programs at the local and regional level through the Yolo County Visitor's Bureau and similar efforts.
- **Policy CO-4.7:** Encourage the identification of historic resources through the integrated use of plaques and markers.
- **Policy CO-4.8:** Explore opportunities for promoting heritage tourism, including cooperation with regional and State marketing efforts.
- **Policy CO-4.9:** Promote the use of historic structures as museums, educational facilities, or other visitor serving uses.
- **Policy CO-4.10:** Encourage voluntary landowner efforts to protect cultural resources consistent with State law.
- **Policy CO-4.11:** Honor and respect local tribal heritage.
- **Policy CO-4.12:** Work with culturally affiliated tribes to identify and appropriately address cultural resources and tribal sacred sites through the development review process.
- **Policy CO-4.13:** Avoid or mitigate to the maximum extent feasible the impacts of development on Native American archaeological and cultural resources.
- **Policy CO-4.14:** Within the Delta Primary Zone, ensure compatibility of permitted land use activities with applicable cultural resources policies of the Land Use and Resource Management Plan of the Delta Protection Commission.
- **Action CO-A53:** Update the Historic Preservation Ordinance on a regular basis to be consistent with applicable federal, State and local Historic Preservation requirements. (Policy CO-4, Policy CO-4.2)
- **Action CO-A54:** Update the historic resources surveys (including the Historic Features Inventory), as needed, to reflect changes due to the passage of time, loss of existing historic resources, and the availability of new or reinterpreted information. (Policy CO-4.1)
- **Action CO-A55:** Identify and establish historic districts, where appropriate, to better preserve individual historical resources and their context. (Policy CO-4.1, Policy CO-4.4)
- **Action CO-A56:** Establish an inventory and map of known significant historic and cultural resources, as well as sensitive areas where such resources are likely to occur. Work with the Rumsey and Cortina Tribes to identify sacred sites and develop a cultural sensitivity map. This information is protected as confidential under State law. (Policy CO-4.1)

- **Action CO-A57:** Conduct historic resource surveys as a part of community and specific plan preparation to document and identify those resources that meet the criteria for listing at the local level, on the California Register of Historical Resources, and on the National Register of Historic Places. Policy CO-4.1)
- **Action CO-A58:** Review and monitor demolition permits, grading permits, building permits, and other approval procedures to reinforce preservation goals. (Policy CO-4.1, Policy CO-4.2, Policy CO-4.3)
- **Action CO-A59:** Establish design guidelines for historic resources based on established federal and State standards and guidelines to address the adaptive reuse and modification of historic resources. (Policy CO-4.1, Policy CO-4.2, Policy CO-4.4)
- **Action CO-A60:** Preserve historical records and make them accessible to the public by maintaining the Yolo County Archives and Record Center. (Policy CO-4.1, Policy CO-4.5)
  - (1) Provide additional space for accommodation of the growing Archives collections
  - (2) Ensure that the collection is housed in an appropriate archival manner
- **Action CO-A61:** Require cultural resources inventories of all new development projects in areas where a preliminary site survey indicates a medium or high potential for archaeological, historical, or paleontological resources. In addition, require a mitigation plan to protect the resource before the issuance of permits. Mitigation may include:
  - (1) Having a qualified archaeologist or paleontologist present during initial grading or trenching;
  - (2) Redesign of the project to avoid historic or paleontological resources;
  - (3) Capping the site with a layer of fill; and/or
  - (4) Excavation and removal of the historical or paleontological resources and curation in an appropriate facility under the direction of a qualified professional. (Policy CO-4.1, Policy CO-4.13)
- **Action CO-A62:** Require that discretionary projects which involve earth disturbing activities on previously undisturbed soils in an area determined to be archaeologically sensitive perform the following:
  - (1) Enter into a cultural resources treatment agreement with the culturally affiliated tribe.
  - (2) Retain a qualified archaeologist to evaluate the site if cultural resources are discovered during the project construction. The archaeologist will have the authority to stop and redirect grading activities, in consultation with the culturally affiliated tribe and their designated monitors, to evaluate the significance of any archaeological resources discovered on the property.
  - (3) Consult with the culturally-affiliated tribe to determine the extent of impacts to archaeological resources and to create appropriate mitigation to address any impacts.
  - (4) Arrange for the monitoring of earth disturbing activities by members of the culturally affiliated tribe, including all archaeological surveys, testing, and studies, to be compensated by the developer.

  - (5) Implement the archaeologist's recommendations, subject to County approval.
  - (6) Agree to relinquish ownership of all artifacts that are found on the project area to the culturally affiliated tribe for proper treatment and disposition. (Policy CO-4.1, Policy CO-4.13)

- **Action CO-A63:** Require that when cultural resources (including non-tribal archeological and paleontological artifacts, as well as human remains) are encountered during site preparation or construction, all work within the vicinity of the discovery is immediately halted and the area protected from further disturbance. The project applicant shall immediately notify the County Coroner and the Planning and Public Works Department. Where human remains are determined to be Native American, the project applicant shall consult with the Native American Heritage Commission (NAHC) to determine the person most likely descended from the deceased. The applicant shall confer with the descendant to determine appropriate treatment for the human remains, consistent with State law. (Policy CO-4.1, Policy CO-4.11, Policy CO-4.12, Policy CO-4.13)
- **Action CO-64:** Prohibit the removal of cultural resources from the project site except by a qualified consultant and after the County planning staff have been notified. Prehistoric resources include chert or obsidian flakes, projectile points, mortars, pestles, dark friable soil containing shell and bone dietary debris, heat-affected rock, or human burials. Historic resources include stone or adobe foundations and walls, structures and features with square nails, and refuse deposits often in old wells and privies. (Policy CO-4.1, Policy CO-4.11)
- **Action CO-A65:** Consult with culturally affiliated tribes prior to amending the General Plan and adopting or amending specific plans, consistent with State law. (Policy CO-4.12, Policy CO-4.13)
- **Action CO-A66:** Confer with culturally affiliated tribes prior to designating open space that includes any identified cultural places and develop a treatment and management plan for their preservation. (Policy CO-4.12, Policy CO-4.13)
- **Action CO-A67:** Refer all development proposals that may adversely affect cultural resources to the Northwest Information Center (NWIC) at Sonoma State University for review and comments. The NWIC will identify the presence or absence of known cultural resources and/or previously performed studies in or near a given project area and will offer recommendations regarding the need for additional studies, where necessary. If the NWIC recommends further study, the project applicant shall contract with a qualified professional to conduct the study and make recommendations designed to avoid or minimize adverse impacts on cultural or historic resources and indicate whether further investigation is needed. All studies shall be completed and submitted to the County prior to the completion of any environmental document for the project. (Policy CO-4.1, Policy CO-4.11)
- **Action CO-A68:** Refer draft environmental documents, including any studies and recommended mitigation measures, to the appropriate culturally-affiliated tribes for review and comment as part of the public review process. (Policy CO-4.1, Policy CO-4.11, Policy CO-4.12)

City of Woodland

General Plan

The City of Woodland General Plan Historic Preservation section establishes the following goals and policies related to cultural resources that are applicable to the proposed project:

- **Goal 6.A:** To preserve and maintain sites, structures, and landscapes that serve as significant, visible reminders of the city's social, architectural, and agricultural history.
- **Policy 6.A.1:** The City shall update and expand the City's Historic Resources Inventory on a regular basis to include all historically and architecturally significant buildings, sites, landscapes, signs, and features within the city limits.
- **Policy 6.A.2:** The City shall establish historic areas to provide for the restoration and preservation of those districts, buildings, and sites in Woodland that are of historic, cultural, or architectural significance.
- **Policy 6.A.3:** The City shall seek to develop incentives for owners of historically-significant income-producing buildings to have their buildings designated a City Historic Landmark or included in a City Historic District.
- **Policy 6.A.4:** The City shall require that environmental review be conducted on demolition permit applications for buildings designated as, or potentially eligible for designation as, historic structures. The City shall follow the guidelines of the CEQA in reviewing demolition requests for such structures and shall prohibit demolition without a structural and architectural analysis of the structure's ability to be rehabilitated and/or relocated.
- **Policy 6.A.5:** The City shall give highest restoration priority to those buildings and open space areas identified as having historic, cultural, or architectural significance that are in imminent danger of decay or demolition.
- **Policy 6.A.6:** The City shall encourage the incorporation of natural resources such as land and water into historic sites and structures when they are important to the understanding and appreciation of the history of the site.
- **Policy 6.A.7:** The City shall consult with property owners early in the process of designating properties or buildings as historically and/or architecturally significant.
- **Goal 6.B:** To combine historic preservation and economic development so as to encourage owners of historic properties to upgrade and preserve their properties in a manner that will conserve integrity of such properties to the best possible condition.
- **Policy 6.B.1:** The City shall encourage the preservation, maintenance, and adaptive reuse of existing historic buildings in the Redevelopment Area and other commercial areas of the city in order to prevent demolition and disrepair.
- **Policy 6.B.2:** The City shall promote reuse of underutilized historic buildings consistent with the *Downtown Specific Plan.*
- **Policy 6.B.3:** The City shall encourage relocation of reusable historic buildings from or into the Redevelopment Area as a means of historic preservation.

- **Policy 6.B.4:** The City shall consider waiving building permit fees and/or providing other appropriate incentives for owners of small properties with historic significance who are unable to benefit from other government programs for historic preservation and for historic preservation projects that provide low-income housing or essential city services.
- **Policy 6.B.5:** The City shall seek the assistance of the Redevelopment Agency and/or local lending institutions to provide below-market rate financing to private property owners for the rehabilitation and restoration of historically-significant structures, and to encourage home ownership in Downtown neighborhoods.
- **Policy 6.B.6:** The City shall aggressively pursue federal and state grants for historic preservation projects involving public-private partnerships, including HOME, Community Development Block Grant (CDBG), and Transportation Enhancement Activities (TEA) grant applications, where appropriate.
- **Policy 6.B.7:** The City shall conduct design competitions when commissioning significant new public buildings within the Redevelopment Area to ensure that new structures are constructed that are compatible with and enhance the surrounding historic built environment.
- **Policy 6.B.8:** The City shall implement the design guidelines in the *Downtown Specific Plan* to ensure that new construction, renovations, and additions are compatible with existing adjacent structures, especially those that are on the National Register, or are eligible or potentially eligible for listing on the National Register.
- **Policy 6.B.9:** The City shall seek to fully implement the Main Street Program, designed by the National Trust for Historic Preservation, which emphasizes historic preservation and economic development.
- **Policy 6.B.10:** The City shall support and recognize the annual "Stroll Through History" event as a City tourism program consistent with the *Economic Development Strategic Plan.* The City shall provide support for the Stroll through expanded advertising and will encourage volunteer staff support to ensure that the Stroll continues to flourish as a largely volunteer event.
- **Policy 6.B.11:** The City shall encourage the involvement of the Woodland Joint Unified School District, private schools, adult education classes, Woodland Community College, local non-profit groups, and the Yolo County Historical Museum in historic preservation and education efforts in Woodland.
- **Policy 6.B.12:** The City shall encourage the Chamber of Commerce and Redevelopment Agency to promote the city's historic resources in visitor and tourist-oriented brochures.
- **Policy 6.B.13:** The City Redevelopment Agency shall seek to provide technical assistance to private property owners as an incentive to rehabilitate historic buildings. Such technical assistance could include grants or deferred loans to develop conceptual designs and cost estimates for rehabilitating historic properties currently underutilized or in disrepair.
- **Goal 6.C:** To preserve the character and livability of Woodland's neighborhoods and strengthen civic pride through neighborhood conservation.

- **Policy 6.C.1:** The City shall promote the formation and maintenance of neighborhood organizations to foster neighborhood conservation programs, giving special attention to transitional areas.
- **Policy 6.C.2:** The City shall carefully review proposals for increased densities in historic neighborhoods, especially in deep lots in the Neighborhood Preservation designation to ensure that such proposals do not have negative effects on the historic and residential character of the neighborhood.
- **Policy 6.C.3:** The City shall encourage historic neighborhoods to establish historic streetscape districts for historic street lamps and landscaping, including reconversion of parkway hardscape to landscape strips with trees.
- **Policy 6.C.4:** The City shall encourage the formation of neighborhood conservation districts to promote neighborhood pride and awareness of historic resources.
- **Policy 6.C.5:** The City shall continue to make available housing rehabilitation loans to low-income residents in historic neighborhoods through the use of grants and outside funding.
- **Policy 6.C.6:** The City shall upgrade City parks in historic neighborhoods as deemed necessary.
- **Policy 6.C.7:** The City shall encourage property owners to retain historic sidewalks or make repairs to deteriorated sidewalks with materials that replicate the appearance of historic sidewalks.
- **Policy 6.C.8:** The City shall adopt and implement design guidelines and/or design standards for historic neighborhoods to help assure that new residential construction, additions, repairs, and remodels preserve the historic nature of the structure and neighborhood and prevent the intrusion of inappropriate architectural design. In addition, the City shall develop programs, such as the development of a Voluntary Historic Register of Homes, which would serve to further protect our historic neighborhoods.
- **Goal 6.D:** To integrate historic preservation more fully into Woodland's comprehensive planning process.
- **Policy 6.D.1:** The City shall coordinate the activities of various City departments and agencies (including the Redevelopment Agency, Public Works Department, and Community Development Department) non-profit organizations, and other associations concerning historic preservation to ensure a unified approach to encourage the preservation, protection, and restoration of historic sites, properties, and public works.
- **Policy 6.D.2:** The City shall fully implement the California *Historical Building Code* and train local building officials to use the code as a tool to foster appropriate and efficient rehabilitation of historic buildings.
- **Goal 6.E:** To promote community awareness and appreciation of Woodland's history and architecture.

- **Policy 6.E.1:** The City shall continue to formally recognize private and public quality rehabilitation and restoration work through awareness ceremonies (e.g., Heritage Home awards and Certificates of Appreciation for commercial and public building rehabilitation work).
- **Policy 6.E.2:** The City shall continue to recognize and promote Historic Preservation Week through City proclamation and by networking with other history groups to develop a calendar of activities during Historic Preservation Week.
- **Policy 6.E.3:** The City shall participate in booths at "Stroll Through History" and the Yolo County Fair to promote historic preservation activities and sell *Walking Tour* booklets.
- **Policy 6.E.4:** The City shall encourage Woodland schools to integrate local architectural history into their curriculum.
- **Policy 6.E.5:** The City shall network with other agencies and organizations, including the Yolo County Historical Society, Yolo County Archives, Yolo County Historical Museum, and other local history groups. The City will also continue its liaison with the Woodland Downtown Improvement Association and Neighbors for Historic Preservation ("Stroll Through History Committee") to promote historic preservation.
- **Policy 6.E.6:** Where inappropriate alterations have been made to historic structures, the City shall endeavor to explain to the property owner how such alterations detract from the property, how they may be removed, and the economic and cultural benefits of restoration.
- **Policy 6.E.7:** The City shall continue to promote the Woodland Historic Landmarks program and develop a model for historic markers and signs for historic sites and buildings.
- **Policy 6.E.8:** The City shall, in coordination with the Woodland Public Library, hold regularly scheduled public workshops, lectures, and slide shows on historic preservation and restoration.
- **Policy 6.E.9:** The City shall communicate with owners of historically designated properties informing them of the benefits of such a designation.
- **Goal 6.F:** To protect Woodland's Native American heritage
- **Policy 6.F.1:** The City shall refer development proposals that may adversely affect archaeological sites to the California Archaeological Inventory, Northwest Information Center, at Sonoma State University.
- **Policy 6.F.2:** The City shall not knowingly approve any public or private project that may adversely affect an archaeological site without first consulting the Archaeological Inventory, Northwest Information Center, conducting a site evaluation as may be indicated, and attempting to mitigate any adverse impacts according to the recommendations of a qualified archaeologist. City implementation of this policy shall be guided by Appendix K of the *CEQA Guidelines.*

3.5.8 - Methodology

Record Searches

Northwest Information Center Record Search

On July 24, 2012, MBA's Senior Project Archaeologist Carrie D. Wills conducted a records search at the NWIC in Rohnert Park. The record search included the project area and a 0.25-mile radius outside the project boundaries. The record search included current inventories of the National Register of Historic Places (NR), the California Historical Landmarks (CHL), and the California Points of Historical Interest (CPHI). The California State Historic Resources Inventory (HRI) for Yolo County was also reviewed to determine if any local resources that have been previously evaluated for historic significance. In addition, archival maps were reviewed for indications of historical structures in the area.

The record search indicated that four studies have been conducted within a 0.25-mile radius of the project area, as shown in Table 3.5-1.

Table 3.5-1: Cultural Resources Reports within 0.25-mile Radius of the Project

Report Number	Author/Year/Title
S-14550	Osborn, USACE/1990/Sacramento Metropolitan Area, Yolo County, California, Cultural Resources Survey Military Transmitter Station
S-22464	Jones & Stokes/1999/Cultural Resource Inventory Report for the Williams Communications, Inc. Fiber Optic Cable System Installation Project, Pittsburg to Sacramento, CA
S-02956	True/1977/North Cottonwood St. Extension and County Facility Parking Lots
S-35042	Far Western Anthropological Research Group/2008/Cultural Resources Inventory of Caltrans District 3 Rural Conventional Highways in Butte, Colusa, El Dorado, Glenn, Nevada, Placer, Sacramento, Sierra, Sutter, Yolo, and Yuba Counties
Source: MBA 2012	

None of these surveys resulted in the discovery of historically significant resources, features, or structures within a 0.25-mile radius of either project site.

Review of the California State Historic Resources Inventory (HRI) for Yolo County indicated that no historic resources have been listed as being eligible for listing on the NR, CR, or local historic registers.

Native American Heritage Commission Record Search

On August 1, 2012, MBA sent a letter to the Native American Heritage Commission (NAHC) in Sacramento in an effort to determine whether any sacred sites listed on its Sacred Lands File are within the current project area. A response has not been received as of this date. When a response is received, it and any further correspondence or consultation efforts will be added to this report as an addendum.

Pedestrian Survey

MBA's Senior Project Archaeologist Carrie D. Wills surveyed the project area on July 31, 2012. The survey consisted of 10- to 15-meter transects when possible, walked in a zigzag pattern to ensure proper coverage. At the Grasslands project area on County Road 104, south of the City of Davis, ground visibility was less than 3 percent, because the area was completely covered with knee-high weedy vegetation and star thistle. The only areas that had ground surface visibility were where rodents had their burrows. No prehistoric or historic resources were discovered during the course of the survey at this area. At the Beamer/Cottonwood project area, the ground surface visibility was fair at 80 to 90 percent because the grassy vegetation had been recently mowed. No prehistoric or historic resources were discovered during the course of the survey at this area.

3.5.9 - Thresholds of Significance

According to Appendix G, Environmental Checklist, of the CEQA Guidelines, cultural resources impacts resulting from the implementation of the proposed project would be considered significant if the project would:

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?

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 formal cemeteries?

3.5.10 - Project Impacts and Mitigation Measures

This section discusses potential impacts associated with the development of the project and provides mitigation measures where appropriate.

Historic Resources

Impact CUL-1:	**Subsurface construction activities associated with the proposed project may damage or destroy previously undiscovered historic resources.**

Impact Analysis

Grasslands Site

There are no structures within the project area, and the record search conducted at the NWIC indicates that there are no known historic structures within the proposed project area or a 0.25-mile radius. As such, no impacts to known historical resources would occur. However, subsurface construction activities associated with the proposed project, such as trenching and grading, could potentially damage or destroy previously undiscovered historic resources. Accordingly, this is a

potentially significant impact. Mitigation is proposed to reduce this potentially significant impact to a level of less than significant.

Beamer/Cottonwood Site

There are no structures within the project area, and the record search conducted at the NWIC indicates that there are no known historic structures within the proposed project area or a 0.25-mile radius. As such, no impacts to known historical resources would occur. However, subsurface construction activities associated with the proposed project, such as trenching and grading, could potentially damage or destroy previously undiscovered historic resources. Accordingly, this is a potentially significant impact. Mitigation is proposed to reduce this potentially significant impact to a level of less than significant.

Level of Significance Before Mitigation

Potentially significant impact.

Mitigation Measures

Grasslands Site

MM CUL-1 If a potentially significant cultural resource is encountered during subsurface earthwork activities for the project, all construction activities within a 50-foot radius of the find shall cease until a qualified archaeologist determines whether the resource requires further study. The County shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. Any previously undiscovered resources found during construction shall be recorded on appropriate Department of Parks and Recreation (DPR) forms and evaluated for significance in terms of California Environmental Quality Act criteria by a qualified archaeologist. Potentially significant cultural resources consist of, but are not limited to stone, bone, glass, ceramics, fossils, wood, or shell artifacts, or features including hearths, structural remains, or historic dumpsites. If the resource is determined significant under CEQA, the qualified archaeologist shall prepare and implement a research design and archaeological data recovery plan that will capture those categories of data for which the site is significant. The archaeologist shall also perform appropriate technical analyses, prepare a comprehensive report and file it with the appropriate Information Center, and provide for the permanent curation of the recovered materials.

Beamer/Cottonwood Site

Implement Mitigation Measure CUL-1.

Level of Significance After Mitigation

Less than significant impact.

Archaeological Resources

Impact CUL-2: Subsurface construction activities associated with the proposed project may damage or destroy previously undiscovered archaeological resources.

Impact Analysis

Grasslands Site

No archaeological resources have been previously recorded within the project area or a 0.25-mile radius, nor were any encountered during the field survey. However, there is always the possibility that ground-disturbing activities during project development could potentially impact prehistoric or historic archaeological resources. Prehistoric resources can include flaked-stone tools (e.g., projectile points, knives, and choppers) or obsidian, chert, or quartzite toolmaking debris; culturally darkened soil (such as midden soil containing heat-affected rock, ash, and charcoal, shellfish remains, and animal bones); and stone milling equipment (such as mortars, pestles, handstones). Historical materials can include wood, stone, foundations, and other structural remains; debris-filled wells or privies; and deposits of wood, glass, ceramics, and other refuse. Accordingly, this is a potentially significant impact. Mitigation is proposed to reduce this potentially significant impact to a level of less than significant.

Beamer/Cottonwood Site

No archaeological resources have been previously recorded within the project area or a 0.25-mile radius, nor were any encountered during the field survey. However, there is always the possibility that ground-disturbing activities during project development could potentially impact prehistoric or historic archaeological resources. Prehistoric resources can include flaked-stone tools (e.g., projectile points, knives, and choppers) or obsidian, chert, or quartzite toolmaking debris; culturally darkened soil (such as midden soil containing heat-affected rock, ash, and charcoal, shellfish remains, and animal bones); and stone milling equipment (e.g., mortars, pestles, handstones). Historical materials can include wood, stone, foundations, and other structural remains; debris-filled wells or privies; and deposits of wood, glass, ceramics, and other refuse. Accordingly, this is a potentially significant impact. Mitigation is proposed to reduce this potentially significant impact to a level of less than significant.

Level of Significance Before Mitigation

Potentially significant impact.

Mitigation Measures

Grasslands Site

MM CUL-2 If areas of prehistoric or historic archaeological resources are encountered during subsurface excavation, all work within 100 feet of the discovery shall cease until a qualified archaeologist can determine the significance of the find. The discoveries shall be evaluated for their CR and NRHP eligibility and recommendations made. The identified resources or resource area shall be avoided by project activities during evaluation. The County of Yolo shall include a standard inadvertent discovery clause

in every construction contract to inform contractors of this requirement. Upon completion of the archaeologist's evaluation, a report shall be prepared documenting the methods and results, and offering recommendations. The report shall be submitted to the County of Yolo, the Northwest Information Center, and the State Historic Preservation Officer (SHPO), if required.

Beamer/Cottonwood Site

Implement Mitigation Measure CUL-2.

Level of Significance After Mitigation

Less than significant impact.

Paleontological Resources

Impact CUL-3: Subsurface construction activities associated with the proposed project may damage or destroy previously undiscovered paleontological resources.

Impact Analysis

Grasslands Site

Although no paleontological resources are known to exist within or near the project area, there is always the possibility that previously unknown, buried paleontological resources could be uncovered during excavation activities. Resources may include but are not limited to fossils from mammoths, saber-toothed cats, rodents, reptiles, and birds. Therefore, this would be a potentially significant impact. Mitigation is proposed to reduce this potentially significant impact to a level of less than significant.

Beamer/Cottonwood Site

Although no paleontological resources are known to exist within or near the project area, there is always the possibility that previously unknown, buried paleontological resources could be uncovered during excavation activities. Resources may include but are not limited to fossils from mammoths, saber-toothed cats, rodents, reptiles, and birds. Therefore, this would be a potentially significant impact. Mitigation is proposed to reduce this potentially significant impact to a level of less than significant.

Level of Significance Before Mitigation

Potentially significant impact.

Mitigation Measures

Grasslands Site

MM CUL-3 If plant or animal fossils are encountered during subsurface excavation activities, all work within 50 feet of the discovery shall cease until a qualified paleontologist has determined the significance of the find and provides recommendations. Project personnel shall not collect or remove any paleontological material. If the paleontological finds are found to be significant, the area shall be avoided by project

activities. The recommendations of the paleontologist shall be incorporated into construction plans.

Beamer/Cottonwood Site
Implement Mitigation Measure CUL-3.

Level of Significance After Mitigation
Less than significant impact.

Human Remains

Impact CUL-4:	**Subsurface construction activities associated with the proposed project may damage or destroy previously undiscovered human remains.**

Impact Analysis
Grasslands Site
There are no known burial sites within the project area. The field survey did not find any evidence of human remains or burial goods within the project area. In addition, none of the previous surveys within a 0.25-mile radius reported finding any human remains. Nonetheless, the possibility exists that subsurface construction activities may encounter undiscovered human remains. Accordingly, this is a potentially significant impact. Mitigation is proposed to reduce this potentially significant impact to a level of less than significant.

Beamer/Cottonwood Site
There are no known burial sites within the project area. The field survey did not find any evidence of human remains or burial goods within the project area. In addition, none of the previous surveys within a 0.25-mile radius reported finding any human remains. Nonetheless, the possibility exists that subsurface construction activities may encounter undiscovered human remains. Accordingly, this is a potentially significant impact. Mitigation is proposed to reduce this potentially significant impact to a level of less than significant.

Level of Significance Before Mitigation
Potentially significant impact.

Mitigation Measures
Grasslands Site

MM CUL-4 In the event of the accidental discovery or recognition of any human remains, CEQA Guidelines Section 15064.5; Health and Safety Code Section 7050.5; Public Resources Code Section 5097.94 and Section 5097.98 must be followed. If during the course of project development there is accidental discovery or recognition of any human remains, the following steps shall be taken:

1. There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the

County Coroner is contacted to determine if the remains are Native American and if an investigation of the cause of death is required. If the coroner determines the remains to be Native American, the coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours, and the NAHC shall identify the person or persons it believes to be the "most likely descendant" (MLD) of the deceased Native American. The MLD may make recommendations to the landowner or the person responsible for the excavation work within 48 hours, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in PRC Section 5097.98.

2. Where the following conditions occur, the landowner or the landowner's authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity either in accordance with the recommendations of the most likely descendant or on the project site in a location not subject to further subsurface disturbance:

    - The NAHC is unable to identify a most likely descendent or the most likely descendent failed to make a recommendation within 48 hours after being notified by the commission.
    - The descendant identified fails to make a recommendation.

    The landowner or the landowner's authorized representative rejects the recommendation of the descendant, and mediation by the NAHC fails to provide measures acceptable to the landowner.

Beamer/Cottonwood Site

Implement Mitigation Measure CUL-4.

Level of Significance After Mitigation

Less than significant impact.