

5.4 CULTURAL 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. This section of the Draft Environmental Impact Report (Draft EIR) evaluates the potential for the project to impact cultural resources. Analysis in this section is based on the following technical studies:

- *Alternative Road Alignments, Castaic High School Site, Los Angeles County, CA*, Supplemental Survey, McKenna et al., May 19, 2012.
- *Addendum Studies: A Class III/Section 106 and Phase I CEQA Cultural Resources Investigation for the Proposed William S. Hart Union High School District Castaic High School Project Area in the Romero Canyon Area of Los Angeles County, California*, Addendum Study, McKenna et al., January 16, 2012.
- *A Class III/Section 106 and Phase I CEQA Cultural Resources Investigation for the Proposed William S. Hart Union High School District Castaic High School Access Roads in the Romero and Sloan Canyon Areas of Los Angeles County, California*, McKenna et al., August 14, 2011.
- *Phase I Archaeological Investigation for the Proposed William S. Hart Union High School District Romero Canyon High School Site APN 3247-068-001 and 3247-068-004 (Tentative Tract 47807) Located in the Castaic Area of Los Angeles County, California*, Gwen R. Romani, April 28, 2010.
- *Intensive Phase I Archaeological Survey/Class III Inventory of APN 3247-068-001, -002, -003, and -004 Los Angeles County, California*, W & S Consultants, December 29, 2007.



Because of the sensitive nature of cultural resources, these studies are not included in the Draft EIR. All cultural resource studies are on file at the William S. Hart Union High School District offices.

5.4.1 Environmental Setting

Study Methodology

The cultural resources investigations consisted of the following tasks:

Archaeological Records Check. Three separate archaeological records checks were performed: California State University, Fullerton, Archaeological Information Center in December 2007; South Central Coastal Information Center (SCCIC), also at CSU Fullerton, in April 2010; SCCIC in July 2011.

Native American Consultation. The Native American Heritage Commission and Los Angeles County Native American representatives were contacted concerning the potential for sacred or religious properties within the project site and tribal knowledge about the project area.

Historical Background Research. The following sources were consulted in April 2010 about listed historic properties within a 0.5-mile radius of the project site:

- The National Register of Historic Places (1979–2002 & supplements)
- The California Inventory of Historical Resources (1976 & supplements)

5. *Environmental Analysis*

CULTURAL RESOURCES

- California Historical Landmarks (1995 & supplemental information)
- California Points of Historical Interest (1992 & supplemental information)

Intensive Archaeological Field Survey. An archaeological field survey of the following locations was conducted:

- Tentative Tract No. 47807 site and surrounding area in December 2007
- Romero Canyon school site in April 2010
- Parcels 2 and 3 and road alignments for Canyon Hill Road, Valley Creek Road, and Romero Canyon Road in January 2012
- Portions of new road alignments for Canyon Hill Road, Mandolin Canyon Road, and a triangular area next to the intersection of Baringer Road and Sloan Canyon Road where several alternative alignments are being considered in May 2012.

Regulatory Background

Federal and State Regulations

National Historic Preservation Act

The National Historic Preservation Act of 1966 authorized the National Register of Historic Places and coordinates public and private efforts to identify, evaluate, and protect the nation's historic and archaeological resources. The National Register includes districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture.

Section 106 (Protection of Historic Properties) of the National Historic Preservation Act of 1966 (NHPA) requires federal agencies to take into account the effects of their undertakings on historic properties. Section 106 Review refers to the federal review process designed to ensure that historic properties are considered during federal project planning and implementation. The Advisory Council on Historic Preservation, an independent federal agency, administers the review process, with assistance from state historic preservation offices.

Archaeological Resources Protection Act

The Archaeological Resources Protection Act of 1979 regulates the protection of archaeological resources and sites which are on federal lands and Indian lands.

Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act (NAGPRA) is a federal law passed in 1990 that provides a process for museums and federal agencies to return certain Native American cultural items, such as human remains, burial objects, sacred objects, or objects of cultural family heritage and lineal descendants and culturally affiliated Indian tribes.

California Public Resources Code

Archaeological, paleontological, and historical sites are protected pursuant to a wide variety of state policies and regulations enumerated under the California Public Resources Code. In addition, cultural

5. Environmental Analysis

CULTURAL RESOURCES

and paleontological resources are recognized as nonrenewable and therefore receive protection under the California Public Resources Code and CEQA.

- California Public Resources Code 5020–5029.5 continued the former Historical Landmarks Advisory Committee as the State Historical Resources Commission. The Commission oversees the administration of the California Register of Historical Resources and is responsible for the designation of State Historical Landmarks and Historical Points of Interest.
- California Public Resources Code 5079–5079.65 defines the functions and duties of the Office of Historic Preservation (OHP). The OHP is responsible for the administration of federally and state mandated historic preservation programs in California and the California Heritage Fund.
- California Public Resources Code 5097.9–5097.991 provides protection to Native American historical and cultural resources, and sacred sites and identifies the powers and duties of the Native American Heritage Commission (NAHC). It also requires notification of discoveries of Native American human remains to descendants and provides for treatment and disposition of human remains and associated grave goods.

Natural Setting

The site and surrounding area are within the western Transverse Ranges geomorphic province and consist of hilly terrain with moderate to steep slopes and adjacent canyons. Access to the site is via Romero Canyon Road (Romani 2010). The Transverse Ranges Geomorphic Province is a set of east-west-trending steep mountain ranges and valleys extending from the Santa Ynez Mountains in Santa Barbara County in the west to the Little San Bernardino Mountains in Riverside County to the east.

Native vegetation includes southern coastal scrub and coastal like oak woodland (Romani 2010). Canyon bottoms are primarily sandy wash (W&S 2007). Geologic units (soil) include recent alluvium deposits, topsoil and colluvium, and bedrock.

Cultural Setting

Background

Prehistory

It is not presently known when prehistoric Native Americans first occupied the project region, known as the Upper Santa Clara Valley region. While some evidence exists to indicate occupation during the Milling Stone Horizon period (8000 to 3800 before present [BP]), such evidence has proven to be unreliable. Consequently, there is considerable doubt that the area was inhabited by humans before 3800 BP (W&S 2007).

However, there is substantial evidence indicating occupation during the Middle Horizon period (3500–1500 BP). During this time period the Upper Santa Clara Valley region was inhabited by an ethnolinguistic group of Native Americans known as the Tataviam. The Tataviam were hunter-gatherers whose diet probably consisted native plants, seeds, and berries as well as small game. Their political, social, and religious culture is believed to have been similar to those of neighboring Native American populations. Characteristics included shamanism (the belief in a direct relationship between an individual and the supernatural world) and an organizational structure based on tribelets (an autonomous land-holding unit controlled by a chief) (W&S 2007).



5. Environmental Analysis

CULTURAL RESOURCES

Although the Tataviam were among the first groups to be contacted by arriving Spanish missionaries, information concerning their way of life is lacking. This is due to the establishment of the mission system in California, which brought about dramatic changes that disrupted traditional hunter-gatherer practices. By 1810 all of the Tataviam had been assimilated into mission San Fernando, fled the area, or had died of disease. Additionally, Tataviam peoples assimilated into the Mission were often absorbed into other tribes by intermarriage (Romani 2010). Thus, although many Tataviam descendants continue to inhabit the area, little is known about traditional Tataviam ways of life. There is currently a Fernandeano Tataviam Band of Mission Indians¹ with tribal offices in the City of San Fernando southeast of the project site.

History

The first Euro-American mention of the Upper Santa Clara Valley region is found in the writings of the 1769 Portola missionary expedition. Subsequent missionary expeditions followed, yet the area remained isolated due to its rugged topography. Large portions of the Upper Santa Clara Valley region became part of Rancho San Francisco, the estancia belonging to Mission San Fernando, in 1804; Rancho San Francisco served as a ranching and perhaps agricultural out-station for Mission San Fernando.

In 1839 Rancho San Francisco was granted by Governor Alvarado to Antonio del Valle. The recorded grant included 46,000 acres of land south of the project site.

In 1859 oil was discovered immediately to the south of Rancho San Francisco. Seven weeks after the sale the first oil well was installed on the property, making the Castaic area the location of the first true oil drilling in the state. Henry Mayo Newhall bought nearly 40,000 acres of the ranch, and used about 7,000 acres for cattle grazing and wheat cultivation. The Newhall Land and Farming Company has continued as the major agricultural/ranching and land development concern in the region to the present time (W&S 2007).

In addition to its ties to early oil exploration in California, the Upper Santa Clara Valley is linked to two other events of historic significance. First, multiple gold discoveries in the region during the mid-1800s led to the establishment of mining activities and link the Upper Santa Clara Valley to California's gold mining history. Second, the region witnessed the collapse of the St. Francis Dam in 1928, which flooded the valley and claimed the lives of 336 persons. St. Francis Dam was in San Francisquito Canyon about 8.3 miles east-northeast of the project site; however, floodwaters from the dam collapse passed through the project site (W&S 2007).

A railroad depot was built in 1887 at Castaic Junction near the present-day junction of I-5 and SR-126 about 4.5 miles southeast of the project site, on a spur between Saugus to the east and Ventura to the west. The first school in Castaic was opened in 1889, and was used until its demolition in 1996. The first post office in Castaic opened in 1894. In 1915 the California Highway Commission completed the Ridge Route—now called the Old Ridge Route—between Castaic and Gorman to the north (CATC 2012a).

Historical Resources

The records search performed at the SCCIC in April of 2010 identified three historical cultural resources in the vicinity of the proposed school site:

- A cabin foundation and dirt access road with associated artifact scatter of metal, glass, and ceramics

¹ "Fernandeano" designates groups of Indians historically associated with Mission San Fernando in the City of San Fernando.

5. Environmental Analysis

CULTURAL RESOURCES

- A probable rock cairn
- Three glass fragments from two bottles

However, none of the aforementioned resources are on the proposed school site. Additionally, W&S Consultants (2007), Romani (2010), and McKenna (2011 and 2012) concluded that there are no significant historical resources on the proposed school site or along any of the proposed roadway alignment alternatives. The records search did not identify any properties within a 0.5-mile radius of the site as listed in any of the previously mentioned historical resources databases (National Register of Historic Places, etc.).

The historic alignments of Romero Canyon Road and Sloan Canyon Road are considered to be historic resources. The associations of the roadways to Albino Romero and Robert Sloan date to 1920; in addition, there is some evidence the general area may have been claimed prior to 1900. The project site is more directly related to the Sloan holdings; the Romero holdings were north of the project site. Neither of the two roadways can be associated with a significant event, significant historic person, or significant architectural design or engineering, nor do they show the potential for buried cultural resources; thus, neither of the two roadways is considered a significant historic resource.

Archaeological Resources

A search of the Sacred Lands File by the Native American Heritage Commission in April 2010 found no known sacred lands in the immediate area of the project site.

A field survey conducted by W&S Consultants in December of 2007 identified one prehistoric archaeological site on the 198-acre school site, but not within the site of the proposed school. The archaeological site contains one feature appearing to be a hearth and a second appearing to be an earth oven. The field survey of the school site conducted by Romani in April of 2010 confirmed this finding. However, the archaeological site would have been directly impacted by development of one of the access roads for the proposed project, if it could have been located.

Archaeological surveys of roadway alignment alternatives by McKenna et al. did not find the archaeological site identified by W&S Consultants in 2007; McKenna verified the location by GPS coordinates. The location was covered with tall grasses and showed evidence of recent burning. No archaeological resources were found in the roadway alignments by the two surveys of the alignments conducted by McKenna et al.

Paleontological Resources

Most of the property is underlain by sandstone and conglomerate bedrock of the Pliocene/Pleistocene Saugus Formation, with areas of thin alluvial material in the canyons (California Environmental 2010). Saugus formation sedimentary rocks have a high potential for the presence of paleontological resources, and fossil specimens have been recovered from Hasley Canyon and Castaic Creek. A fossil locality south of the project site near the mouth of Hasley Canyon produced specimens of fossil alligator lizard and pocket gopher; a second fossil locality south of Hasley Canyon produced fossil horse specimens; and a third locality in Saugus Formation locality east of Castaic yielded fossil specimens of horse and dog (McKenna 2012). Therefore, there is a high probability that paleontological resources are present on the project site (school site and roadway alignments).



5. Environmental Analysis

CULTURAL RESOURCES

5.4.2 Thresholds of Significance

CEQA Guidelines Section 15064.5 provides direction on determining significance of impacts to archaeological and historical resources. Generally, a resource shall be considered “historically significant” if the resource meets the criteria for listing on the California Register of Historical Resources (Public Resources Code Section 5024.1), including the following:

- Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
- Is associated the with lives of persons important in our past;
- Embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- Has yielded, or may be likely to yield, information important in prehistory or history.

The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, or is not included in a local register of historical resources, does not preclude a lead agency from determining that the resource may be an historical resource.

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

- CUL-1 Cause a substantial adverse change in the significance of an historical resource pursuant to Section 15064.5.
- CUL-2 Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.
- CUL-3 Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
- CUL-4 Disturb any human remains, including those interred outside of formal cemeteries.

The Initial Study, included as Appendix A substantiates that impacts associated with Threshold C-4 would be less than significant. This impact will not be addressed in the following analysis.

5.4.3 Environmental Impacts

The following impact analysis addresses thresholds of significance for which the Initial Study disclosed potentially significant impacts. The applicable thresholds are identified in brackets after the impact statement.

In the following impact analysis, “project site” refers to the entire 198-acre, four-parcel site (not all of which would be graded), and the “school site” refers to the 71.4-acre site proposed for development of the high school and the landslide remediation work.

IMPACT 5.4-1: PROJECT DEVELOPMENT WOULD NOT SUBSTANTIALLY CHANGE THE SIGNIFICANCE OF A HISTORICAL RESOURCE. [THRESHOLD CUL-1]

Impact Analysis: There are three historical resources within a 0.5-mile radius of the proposed school site: a cabin foundation with dirt access road, a rock cairn, and a few glass fragments. None of these are listed on the National Register of Historic Places or the California Register of Historical Resource. None of the resources have unique workmanship or materials or association with historically important persons or events and thus do not meet significance criteria under CEQA. Additionally, while the Upper Santa Clara Valley region is associated with three events of historical significance to California (oil mining, gold mining, and collapse of the St. Francis Dam), the school site falls outside the areas of major historical development and use in the region.

No historic resources were found on the school site by either investigation. Romero Canyon Road and Sloan Canyon Road were identified as historic resources, but not significant historic resources, and development of proposed access roads on the historic alignments of these two roadways would not damage historically significant resources.

However, given the over 200-year record of Euro-American habitation in the Upper Santa Clara River Valley, and the presence of three historic resources within 0.5 mile of the project site, there is some possibility that historic resources could be buried in site soils and that such resources may be damaged by site grading and construction activities. Possible destruction of historic resources would be a significant impact. Mitigation measures CUL-1 through CUL-6 would reduce this impact to less than significant.

IMPACT 5.4-2: DEVELOPMENT OF PROJECT ROADWAYS WOULD NOT IMPACT AN ARCHAEOLOGICAL SITE IDENTIFIED IN THE PROJECT SITE. [THRESHOLD CUL-2 (PART)]

Impact Analysis: One prehistoric archaeological site was identified within Parcel 2 of the project site, but outside of the school site. The archaeological site contains what appear to be a hearth and an earth oven. Ground disturbance during site grading and construction of the school would not disturb this resource. The archaeological site was identified by W&S in 2007 as being in the alignment of a proposed access road for the school. The location of the archaeological site was intensively surveyed in 2011 and the site was not found. The location of the site was covered with tall grasses with evidence of recent burning. No other archaeological resources were identified in the roadway alignment alternatives in the two surveys of those alignments conducted in 2011 and 2012. Development of proposed roadways would not impact this previously identified archaeological site.

IMPACT 5.4-3 PROJECT GRADING AND CONSTRUCTION ACTIVITIES COULD DAMAGE PREVIOUSLY UNDISCOVERED BURIED ARCHAEOLOGICAL RESOURCES. [THRESHOLD CUL-2 (PART)]

Impact Analysis: The records searches and field surveys conducted in December 2007, April 2010, and January 2012 did not identify any archaeological resources on the proposed school site. However, considering the archaeological evidence for Native American habitation of the Upper Santa Clara River Valley from at least 3500 BP and the archaeological site found within the project site, there is the potential for more archaeological resources to be unearthed during grading and construction. Possible destruction of archeological resources would be a significant impact. Mitigation measures CUL-1 through CUL-6 would reduce this impact to less than significant.



5. Environmental Analysis

CULTURAL RESOURCES

IMPACT 5.4-4: PROJECT DEVELOPMENT COULD DESTROY UNIQUE PALEONTOLOGICAL RESOURCES. [THRESHOLD CUL-3 (PART)]

Impact Analysis: Grading of the school site would involve a significant amount of earthwork for the school site, landslide areas, and roadways. Saugus Formation conglomerate and sandstone, which underlie much of the site as well as much of the access road alignments, have yielded a number of vertebrate fossil specimens from Hasley Canyon and Castaic Creek. Site grading and excavation could disturb Saugus Formation bedrock and could thus impact paleontological resources anticipated to occur in the onsite bedrock. Possible destruction of paleontological resources would be a significant impact. Mitigation measures CUL-7 through CUL-13 would reduce this impact to less than significant.

IMPACT 5.4-5 PROJECT DEVELOPMENT WOULD NOT DESTROY UNIQUE GEOLOGICAL RESOURCES. [THRESHOLD CUL-3 (PART)]

Impact Analysis: Landforms onsite consist of hills and canyons, which are common in lower-elevation parts of the Transverse Ranges Geomorphic Province and, thus, are not unique geological features. Development of the project would not destroy any unique geological features.

5.4.4 Cumulative Impacts

The project site was not found to contain significant paleontological or historical cultural resources. One prehistoric archaeological site was found within the project site, but not within the proposed school site, by W&S in 2007. That archaeological site was not found by a subsequent survey of that location by McKenna et al. in 2011. However, the research did not fully eliminate the potential for disturbing previously undiscovered resources or remains. The potential for cumulative impacts to cultural resources from other cumulative projects is unknown but likely similar due to their location in the Upper Santa Clara River Valley. Destruction of significant cultural resources from each of these projects would constitute a significant cumulative impact.

However, similar to the proposed project, other projects would require mitigation of impacts, including construction monitoring, testing, archiving, and recovery of any found resources prior to development of the site. The proposed project has incorporated mitigation measures (CUL-1 through CUL-13) that would reduce the potential to contribute to cumulative impacts. Therefore, the project would not result in substantial impacts to cultural resources. In consideration of the preceding factors, the project's contribution to cumulative cultural resource impacts would be rendered less than significant, and therefore project impacts would not be cumulatively considerable.

5.4.5 Existing Regulations and Standard Conditions

Federal

- National Historic Preservation Act
- Archaeological Resources Protection Act
- Native American Graves Protection and Repatriation Act

State

- California Public Resources Code Sections 5020–5029.5, 5079–5079.65, 5097.9–5097.99

5.4.6 Level of Significance Before Mitigation

Upon implementation of existing regulations and standard conditions Impact 5.4-2 and Impact 5.4-5 would be less than significant.

Without mitigation, the following impacts would be **potentially significant**:

- Impact 5.4-1 Historic resources could be buried in site soils and may be disturbed by project ground-disturbing activities.
- Impact 5.4-3 Project ground-disturbing activities could damage previously undiscovered archaeological resources buried in site soils.
- Impact 5.4-4 Project development could destroy unique paleontological resources.

These impact conclusions apply to both project-specific and cumulative impacts.

5.4.7 Mitigation Measures

Impact 5.4-1

CUL-1 Prior to the initiation of project-related earthmoving activities and excavation, the School District school facilities project manager or their designee shall retain a County-certified qualified archaeologist. The qualified archaeologist shall meet the Secretary of the Interior’s Professional Qualifications Standards (48 Federal Register 44738–39). The archaeologist must have knowledge of both prehistoric and historical archaeology.

CUL-2 Prior to the initiation of project-related earthmoving activities and excavation, a cultural resource monitoring plan shall be prepared by a qualified archeologist.

- The cultural resource monitoring plan shall outline when and for how long monitoring shall occur, where on the site monitoring of vegetation clearing and earthmoving activities shall be required, methods of monitoring, types of artifacts anticipated, procedures for temporary stop and redirection of work to permit sampling, identification and evaluation of possible resources, procedures for additional analysis, and accommodation and procedures for Native American monitors, if any.

CUL-3 Prior to the start of ground disturbing activities on the project site, the School District school facilities project manager or their designee shall ensure that a qualified archaeologist or another mitigation program staff member has conducted cultural resources sensitivity training for all construction workers involved in moving soil or working near soil disturbance.

- Construction personnel, including heavy-equipment operators, shall be briefed on procedures to be followed in the event that cultural remains are encountered by earthmoving activities, particularly if archaeological construction monitors are not on site.
- Pre-construction training shall include:



5. Environmental Analysis

CULTURAL RESOURCES

- Review the types of archaeological resources that might be found
 - Review of laws and applicable requirements concerning the protection of cultural resources.
 - Prehistoric or historic cultural resource discovery procedures
 - The briefing shall be presented to new contractor personnel as necessary.
 - Names and telephone numbers of the monitor and other mitigation program personnel shall be provided to appropriate construction personnel.
- CUL-4 During project-related earthmoving activities and excavation, the construction manager shall adhere to the stipulations of the cultural resource monitoring plan. The archaeologist shall have the authority to halt any project-related activities adversely impacting potentially significant resources.
- CUL-5 During project-related earthmoving activities and excavation, if cultural resources are uncovered they shall be recovered and analyzed in accordance with CEQA guidelines. A qualified archaeologist shall assess the find(s) and determine if they are of value. If the find(s) are of value then:
- Suspension of ground disturbances within a 30-foot radius of the discovery shall not be lifted until the archaeological monitor has evaluated the find to assess whether they are classified as historical resources or unique archaeological sites, pursuant to CEQA.
 - The construction contractor shall prepare all potential finds in excavated material to the point of identification.
 - Significant archaeological resources found shall be preserved as determined necessary by the archaeologist.
 - Excavated finds shall be curated at either the Los Angeles County Natural History Museum or its designee on a first-refusal basis. After which finds shall be offered to a local museum or repository willing to accept the resource.
 - Within 30 days of completion of the end of earth moving activities, the archeologist shall draft report summarizing the finds, and shall include the inspection period, an analysis of any resources found, and identification of the repository.
 - Any resulting reports shall be filed with the School District or their designee and with the South Central Coastal Information Center at the California State University, Fullerton.

Impact 5.4-3

- CUL-6 Prior to the start of any ground disturbing activities on the project site Native American representatives from the Fernandeno Tataviam Band of Mission Indians (Tribe) shall be

5. Environmental Analysis

CULTURAL RESOURCES

notified of the pending activities. The qualified archaeologist shall coordinate with the Tribal representatives during the drafting of the archaeological monitoring plan. During ground disturbing activities, if there is any evidence of Native American resources (significant or otherwise), action shall be taken in accordance with the archaeological monitoring plan and Mitigation Measures CUL-1 through CUL-5.

Impact 5.4-4

CUL-7 Prior to the initiation of project-related earthmoving activities and excavation, the School District school facilities project manager or their designee shall retain a qualified paleontologist approved by Los Angeles County and the Natural History Museum of Los Angeles County Vertebrate Paleontology Section.

CUL-8 Prior to the initiation of project-related earthmoving activities and excavation, a cultural resource monitoring plan shall be prepared by a qualified paleontologist.

- The cultural resource monitoring plan shall outline when and for how long monitoring shall occur, where on the site and at what depths monitoring of earthmoving activities shall be required, methods of monitoring, types of artifacts anticipated, procedures for temporary stop and redirection of work to permit sampling, identification and evaluation of possible resources, procedures for additional analysis.

CUL-9 Prior to the initiation of project-related earthmoving activities and excavation, the School District school facilities project manager or their designee shall ensure that a qualified paleontologist or other mitigation program staff member has conducted paleontological resources sensitivity training for all construction workers involved in moving soil or working near soil disturbance.

- Construction personnel, including heavy-equipment operators, shall be briefed on procedures to be followed in the event that cultural remains are encountered by earthmoving activities, particularly if paleontological construction monitors are not on site.
- Pre-construction training shall include:
 - Review the types of paleontological resources that might be found
 - Review of laws and applicable requirements concerning the protection of fossil resources.
 - Paleontological resource discovery procedures
- The briefing shall be presented to new contractor personnel as necessary.
- Names and telephone numbers of the monitor and other mitigation program personnel shall be provided to appropriate construction personnel.

CUL-10 During project-related earthmoving activities and excavation, a qualified paleontologist shall monitor ground-disturbing activities in accordance with the cultural resource monitoring plan.



5. Environmental Analysis

CULTURAL RESOURCES

- Monitoring shall consist of visually inspecting debris piles and freshly exposed strata to allow for the discovery and recovery of larger fossil remains, and periodically dry test screening rock, sediment, and debris to inspect smaller fossil remains. As soon as practicable, the monitor shall recover all larger vertebrate fossil remains, a representative sample of invertebrate or plant fossil specimens, or any fossiliferous rock or sediment sample that can be recovered easily. If recovery of a large or unusually productive fossil occurrence is warranted, earthmoving activities shall be diverted temporarily around the fossil site and a recovery crew shall be mobilized as necessary to remove the occurrence as quickly as possible. If not on site when a fossil occurrence is uncovered by such activities, the activities shall be diverted temporarily around the fossil site and the monitor called to the site to evaluate and, if warranted, recover the occurrence. If the paleontologist or monitor determines that the fossil site is too unproductive or the fossil remains not worthy of recovery by the monitor, no further action will be taken to preserve the fossil site or remains, and earthmoving activities shall be allowed to proceed through the site immediately. The location and proper geologic context of any recovered fossil occurrence or rock or sediment sample shall be documented.

CUL-11 During or after project-related earthmoving activities and excavation, all fossil specimens recovered from the area as a result of mitigation, including those from processing rock or sediment samples, will be treated (i.e., prepared, identified, curated, catalogued) in accordance with designated museum repository requirements. Rock or sediment samples shall be submitted to commercial laboratories for microfossil, pollen, radiometric dating, or other analysis, as appropriate.

CUL-12 During project-related earthmoving activities and excavation, the monitor shall maintain daily monitoring logs that include the particular tasks accomplished, the earthmoving activity monitored, the location where monitoring was conducted, the rock unit(s) encountered, the fossil specimens recovered, and associated specimen data and corresponding geologic and geographic site data.

CUL-13 Within 30 days of completion of the end of earth moving activities, a final technical report of results and findings shall be prepared by the paleontologist in accordance with any County requirement and the cultural resource monitoring plan.

- Any resulting reports shall be filed with the School District or their designee and the museum repository.

5.4.8 Level of Significance After Mitigation

The mitigation measures identified above would reduce potential impacts associated with cultural resources to a level that is less than significant. Therefore, no significant unavoidable adverse impacts relating to cultural resources have been identified. These impact conclusions apply to both project-specific and cumulative impacts.