

J. CULTURAL RESOURCES

This section describes existing cultural resources conditions in the Larkspur SMART Station Area Plan (Plan) area, identifies potentially significant impacts on cultural resources that may result from Station Area Plan implementation, and recommends program-level mitigation measures to reduce the severity of significant impacts.

Cultural resources are sites, buildings, structures, objects, and districts that may have traditional or cultural value for their historical significance. Cultural resources include a broad range of resources, examples of which include archaeological sites, historic roadways and railroad tracks, and buildings of architectural significance. For a cultural resource to be considered a historical resource for purposes of the California Environmental Quality Act (CEQA) (CCR Section 15064.5(a)), it generally must be 50 years or older¹ and: (1) listed in, or determined eligible for listing in, the California Register of Historical Resources by the State Historical Resources Commission; (2) listed in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a survey meeting the requirements of PRC Section 5024.1(g); or (3) formally recognized by a lead agency as constituting a historical resource.

Under CEQA, paleontological resources are a subset of cultural resources and include fossil plants and animals, and evidence of past life such as trace fossils and tracks. Ancient marine sediments may contain invertebrate fossils representing snails, clam and oyster shells, sponges, and protozoa; and vertebrate fossils such as fish, whale, and sea lion bones. Terrestrial sediments may contain fossils that represent such vertebrate land mammals as mammoth, camel, saber tooth cat, horse, and bison.

1. Setting

This section: (1) describes the methods used to establish the baseline conditions for cultural resources in the Plan area; (2) provides a brief historical overview of the area; (3) includes the State and local legislative regulatory context for cultural resources; and (4) describes the cultural resources identified in the Plan area.

a. Methods. This cultural resources analysis included archival records searches and a literature review. This work was done to establish the baseline conditions for cultural resources in the Plan area.

(1) Records Searches. Records searches were conducted to identify cultural resources within the Plan area. Records searches were conducted on June 11, 2012, at the Northwest Information Center (NWIC) of the California Historical Resources Information System, Sonoma State University, Rohnert Park, California and on June 13, 2012, at the California Native American Heritage Commission (NAHC), Sacramento. The NWIC, an affiliate of the State of California Office of Historic Preservation, is the official state repository of cultural resources records and reports for Marin County. The NAHC maintains the Sacred Lands File, which includes the locations of sites with cultural significance to Native American groups.

¹ California Office of Historic Preservation, 2006. *California Register and National Register: A Comparison (for purposes of determining eligibility for the California Register)*. Technical Assistance Series No. 6. California Department of Parks and Recreation, Sacramento.

As part of the records search, LSA also reviewed the following State of California and City inventories:

- *California Inventory of Historic Resources*;²
- *Five Views: An Ethnic Historic Sites Survey for California*;³
- *Directory of Properties in the Historic Property Data File for Marin County*.⁴ The directory includes the listings of the National Register of Historic Places, National Historic Landmarks, the California Register of Historical Resources, California Historical Landmarks, and California Points of Historical Interest;
- *Shipwreck Database*;⁵ and
- *City of Larkspur Historic Resources Inventory*.⁶

(2) **Literature Review.** LSA conducted a literature review of the Plan area for archaeological, ethnographic, historical, and environmental information for cultural resources baseline conditions. This review included previous cultural resource background reports prepared for projects within the Plan area, including the Historic Resources and Archaeological Resources sections of the SMART EIR (2005).⁷ The City's General Plan and Municipal Code were also reviewed to identify policies and guidelines pertinent to cultural resources.

LSA also reviewed paleontological and geological maps and literature pertaining to the Plan area to prepare the paleontological setting section.

b. Cultural Resources Overview. This section briefly describes the existing conditions for cultural resources in the Plan area as determined by the records searches and literature review described above.

(1) **Prehistory and Ethnography.** The Paleo-Archaic-Emergent cultural sequence developed by Fredrickson,⁸ and updated by Milliken et al.,⁹ is commonly used to interpret the prehistoric

² California Department of Parks and Recreation, 1976. *California Inventory of Historic Resources*. Sacramento.

³ California Department of Parks and Recreation, Office of Historic Preservation, 1988. *Five Views: An Ethnic Historic Site Survey for California*. Sacramento.

⁴ California Department of Parks and Recreation, 2008. Office of Historic Preservation, *Directory of Properties in the Historic Property Data File*. Sacramento. November 10.

⁵ California State Lands Commission, 2012. *Shipwreck Database Search Form*. Electronic document: shipwrecks.slc.ca.gov/ShipwrecksDatabase/Shipwrecks_Database.asp (accessed June 7, 2012).

⁶ Larkspur, City of, 2008. *Historic Resources Inventory*.

⁷ Parsons, Brinckerhoff Quade & Douglas, Inc., 2005. *Sonoma Marin Area Rail Transit Draft EIR, Historic Resources and Archaeological Resources Sections*. November.

⁸ Fredrickson, David A., 1974. Cultural Diversity in Early Central California: A View from the North Coast Ranges. *Journal of California Anthropology* 1(1):41-53.

⁹ Milliken, Randall et al., 2007. Punctuated Culture Change in the San Francisco Bay Area. In *California Prehistory: Colonization, Culture, and Complexity*, edited by Terry L. Jones and Kathryn A. Klar, pp. 99-123. AltaMira Press, Plymouth, United Kingdom.

occupation of Central California. The recalibrated sequence consists of three broad periods: the Paleoindian Period (11,500-8000 cal B.C.); the three-staged Archaic Period, consisting of the Lower Archaic (8000-3500 cal B.C.), Middle Archaic (3500-500 cal B.C.), and Upper Archaic (500 cal B.C.- cal A.D. 1050); and the Emergent Period (cal A.D. 1050-Historic).

The Paleoindian Period began with the first entry of people into California. These people probably subsisted mainly on big game, minimally processed plant foods, and had few or no trade networks. During the Lower Archaic, milling stones for plant processing are abundant and hunting is less important than obtaining plant foods. Artifacts are predominantly of local materials, suggesting that few if any extensive trade networks were established at this time. During the Middle Archaic, the subsistence base begins to expand and diversify with a developing acorn economy, as evidenced by the mortar and pestle, and the growing importance of hunting. Status and wealth distinctions are evidenced in the Upper Archaic archaeological record, and regional trade networks are well established at this time for the exchange of goods and ideas, such as obsidian and Kuksu ceremonial practices involving spirit impersonations. Increasing social complexity continued during the Lower Emergent. Territorial boundaries were well established by this time with regularized inter-group exchanges involving more and varied goods, people, and ideas. Bow and arrow technology was also introduced. By the Upper Emergent, a monetary system based on the clamshell disk bead had been established. Native population reached its zenith during this time, as evidenced by high site densities and large village sites in the archaeological record.

Excavations at archaeological site CA-MRN-255/H in the Plan area yielded numerous prehistoric artifacts, including stone tool chipping waste; projectile points and bifaces; bone, antler, and shell artifacts, including awls and beads; mortars and pestles; shellfish roasting pits; and Native American graves.¹⁰ The artifacts and dates obtained from CA-MRN-255/H indicate that the site was occupied by groups for much of the year during the Upper Archaic Period. The occupants of CA-MRN-255/H hunted a variety of game, took fish and shellfish from the Bay, and exchanged items (e.g., obsidian) with groups to the north in Napa Valley and near present-day Santa Rosa.

The Plan area is in the ethnographic territory of the Coast Miwok, who occupied what are now Marin and southern Sonoma counties.¹¹ The Coast Miwok language is subsumed under the Penutian language stock and includes two dialects: Western, or Bodega, and Southern, or Marin, with Southern being further divided into valley and coast.^{12,13}

Coast Miwok territories were comprised of one or more land-holding groups that anthropologists refer to as “tribelet.” The tribelet, a nearly universal characteristic throughout native California,

¹⁰ Bieling, David G., 2000. *Archaeological Investigations at CA-MRN-255/H, Larkspur, Marin County, California*. Holman & Associates, San Francisco, California.

¹¹ Kelly, Isabel, 1978. Coast Miwok. In *California*, edited by Robert F. Heizer, pp. 485-495. Handbook of North American Indians, Volume 8, William C. Sturtevant, general editor. Smithsonian Institution, Washington, D.C.

¹² Barrett, Samuel A., 1908. The Ethno-geography of the Pomo and Neighboring Indians. *University of California Publications in American Archaeology and Ethnology* 6(1). Berkeley.

¹³ Kelly, Isabel, 1978. Native Languages of California. In *California*, edited by Robert F. Heizer, pp. 80-90. Handbook of North American Indians, Volume 8, William C. Sturtevant, general editor. Smithsonian Institution, Washington, D.C.

consists of a principle village occupied year round, and a series of smaller hamlets and resource gathering and processing locations occupied intermittently or seasonally.¹⁴ Populations of tribelets ranged between 50 and 500 persons and were largely determined by the carrying capacity of a tribelet's territory. The closest known tribelet settlements to the Plan area were the Habastos and Huimen.¹⁵ The Habastos and Huimen tribelets were depopulated beginning in the late eighteenth century, with members sent to Mission San Francisco (established 1776) and later, Mission San Rafael, which was established in 1817.

Coast Miwok year-round villages were established along estuaries, bays, and creeks, while seasonal settlements lay in the surrounding hills.¹⁶ Dwellings were constructed from tule grasses and accommodated six to ten individuals related by marriage or blood ties. Semi-subterranean sweathouses provided a gathering place for men and women as well as an opportunity for daily cleansing. Large villages had a ceremonial dance house that was about 15 feet in diameter and set about two-feet deep in the ground.¹⁷ A dance house was constructed for social, ceremonial, and political events and activities.

Subsistence methods were based on the seasonal availability of resources. Deer, various kinds of fish and shellfish, rabbits, and small game were available year-round. Seasonally available foods included migratory birds and salmon in the winter; acorns, buckeye, nuts, greens, and seeds from spring to fall. Acorns were a staple food source for the Coast Miwok as they were for many California natives because they could be stored.

The traditional Coast Miwok lifeway was severely disrupted due to introduced diseases, a declining birth rate, and the impact of the mission system. Coast Miwok were transformed from hunters and gatherers into agricultural laborers who lived at the missions. Later, because of the secularization of the missions by Mexico in 1834, most of the aboriginal population gradually moved to ranchos to work as manual laborers.

Today, many Coast Miwok people still live in their ancestral territory in Marin County and continue to engage in traditional cultural practices. The Federated Indians of Graton Rancheria (FIGR) are a federally recognized tribe consisting of both Coast Miwok and Southern Pomo (whose ancestral tribal territory is in northern Sonoma County). FIGR, established in 1992, provides members with economic and educational opportunities, and seeks to preserve their traditional heritage.

(2) History. San Quentin Peninsula was originally granted to Juan Bautista Roger Cooper in 1840 as the Punta de Quintin Rancho. Shortly thereafter, Cooper entered into an agreement with Captain Joseph Folsom of the San Francisco Presidio to construct a lumber mill on the land grant at present-day Larkspur. The mill was the principal improvement on the peninsula until 1852 when the

¹⁴ Kroeber, Alfred L., 1955. Nature of the Land-Holding Group. *Ethnohistory* 2:303-314.

¹⁵ Milliken, Randall, 1995. *A Time of Little Choice: The Disintegration of Tribal Culture in the San Francisco Bay Area 1769-1810*, 242-244. Ballena Press, Menlo Park, California.

¹⁶ Kelly, Isabel, op. cit.

¹⁷ Ibid.

State began construction of San Quentin Prison. Until the late nineteenth-century, the remaining Rancho saw few improvements, beyond a cattle ranch, the sawmill, and a few residences.

In 1852, the State entered into a contract with General Mariano Vallejo and Major General James Madison Estell to construct San Quentin Prison in exchange for rights to use prison labor.¹⁸ This prison labor was used at Estell's brickyard, one of the earliest documented brickyards in Marin County and sited near the prison.

The history of the Plan area is closely associated with brick making. In addition to Estell's brickyard, other brickyards are reported on San Quentin Peninsula in the 1850s, including Van Arnun's (c. 1854), McCauley-Quinn's (c. 1857), and Sheppard's (1854).¹⁹ In 1890 the Oakland-based Remillard Brick Company purchased 160 acres on the peninsula to expand its holdings and constructed the Green Brae Brickyard. The Green Brae Brickyard operated from 1891 to 1915 and included a small community of laborers who lived nearby. The community included 16 cabins for workmen, a cook-house, stable, blacksmith shop, vegetable gardens, and an orchard. Tubb Lake was also created to provide water for the worker community and brickyard equipment.

The Superintendent's House, a hipped-roof Victorian cottage associated with the Green Brae Brickyard, remains in the Plan area at 2900 Larkspur Landing Circle. A brick kiln and chimney at 125 East Sir Francis Drake Boulevard, also in the Plan area, are the only surviving structures associated with the Remillard Brick Company, once the largest brick manufacturer on the Pacific Coast. The Superintendent's House and the Remillard Brick Kiln are listed in the Larkspur Historic Resource Inventory and the National Register of Historic Places, respectively (see Section IV.J.1.d, Identified Cultural Resources, below).

In 1924, Dwight Hutchinson purchased 75 acres from the Remillard Brick Company. The land acquired by Hutchinson, located in the hills north of the Remillard brick kiln, was used as a quarry where a grinder produced crushed rock. The crushed rock was carried along conveyer belts to barges docked nearby, where they were transported to various public works projects throughout the Bay Area. The Hutchinson Quarry barged crushed rock from the site until the late 1950s and provided fill and base for Treasure Island, access roads for the Golden Gate Bridge, and Marin County highways and roads.²⁰

Substantial residential, retail, and transportation-related development occurred in the Plan area during the 1960s-1970s, including the former Hutchinson Quarry site, Larkspur Ferry Terminal, and Marin County Mart. In 1969, the City annexed the former Hutchinson Quarry and would eventually approve development of 478 apartments at the site.²¹ The Larkspur Ferry Terminal was constructed at the mouth of Corte Madera Creek and dedicated in December 1976, and two years later construction of Marin County Mart (Larkspur Landing Center) began.

¹⁸ Dean, Randall L., 1998. *Prehistoric and Historic Context Archaeological Report for the Ross Valley Marin Sanitary District Study Area, Larkspur, California*. Holman & Associates, San Francisco, California.

¹⁹ Ibid.

²⁰ Larkspur Heritage Preservation Board, 2010. *Larkspur Past and Present: A History and Walking Guide*. Larkspur Heritage Preservation Board.

²¹ Ibid.

(3) Paleontology. The Plan area is underlain by Quaternary (1.8 million years before present to present) alluvium and Mesozoic era (251 million to 66 million years before present) Franciscan Complex deposits and bedrock outcrops. Some of these deposits have the potential to contain paleontological resources (fossils) and are discussed below.

Quaternary Deposits. Quaternary deposits of Holocene age (circa 10,000 years B.P. to present) occur in the Plan area. These deposits consist of Holocene Bay Mud (Qhbm), comprising silt, clay, peat, and fine sand deposited at or near sea level along San Francisco Bay, and undifferentiated Holocene alluvium (Qha) that includes sand, silt, and gravels typically deposited in flat, smooth valley bottoms along small to medium-sized streams.²² Holocene deposits are typically too recent to contain significant fossiliferous deposits.

Franciscan Complex. The exposed bedrock and native rock underlying the alluvial deposits in the Plan area is of the Franciscan Complex. The Franciscan Complex is a group of high pressure and low temperature metamorphic rocks that was formed from the Middle and Upper Jurassic (175,000,000 to 144,000,000 years B.P.) to the Lower Cretaceous (144,000,000 to 100,000,000 years B.P.). It is composed of volcanic and metavolcanic rocks, metamorphosed and unmetamorphosed sandstone, shale, conglomerate, chert, greenstone, and metagraywacke, and is the basement rock of the region. Marine fossils, including *Ichthyosaurus*, *Belemnoides*, *Buchia*, and *Inoceramus*, occur in the unmetamorphosed rocks of the Franciscan Complex.²³

c. Regulatory and Legislative Context. The following describes State and City regulatory and policy requirements for cultural resources.

(1) California Environmental Quality Act. The California Environmental Quality Act (CEQA) applies to all discretionary projects undertaken or subject to approval by the State's public agencies (California Code of Regulations [CCR] Title 14(3) §15002(i)). CEQA states that it is the policy of the State of California to "take all action necessary to provide the people of this state with... historic environmental qualities...and preserve for future generations examples of the major periods of California history" (Public Resources Code [PRC] §21001(b), (c)). Under the provisions of CEQA, "A project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment" (CCR Title 14(3) §15064.5(b)).

CEQA §15064.5(a) defines a "historical resource" as a resource which meets one or more of the following criteria:

- Listed in, or eligible for listing in, the California Register;
- Listed in a local register of historical resources (as defined at PRC §5020.1(k));

²² Witter, Robert C., et al., 2006. *Maps of Quaternary Deposits and Liquefaction Susceptibility in the Central San Francisco Bay Region, California*. U.S. Geological Survey Open-File Report 2006-1037. Electronic document: pubs.usgs.gov/of/2006/1037/ (accessed on June 24, 2012).

²³ Berkeley Natural History Museum, 2012. Museum of Paleontology searchable database. Website: bnhm.berkeley.edu/query/index.php (accessed June 21, 2012).

- Identified as significant in a historical resource survey meeting the requirements of §5024.1(g) of the Public Resources Code; or
- Determined to be a historical resource by a project's lead agency (CCR Title 14(3) §15064.5(a)).

A historical resource consists of “Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California... Generally, a resource shall be considered by the lead agency to be ‘historically significant’ if the resource meets the criteria for listing in the California Register of Historical Resources” (CCR Title 14(3) §15064.5(a)(3)).

CEQA requires that historical resources and unique archaeological resources be taken into consideration during the CEQA planning process (CCR Title 14(3) §15064.5; PRC §21083.2). If feasible, adverse effects to the significance of historical resources must be avoided, or the effects mitigated (CCR Title 14(3) §15064.5(b)(4)). The significance of an historical resource is impaired when a project demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for the California Register of Historical Resources. If there is a substantial adverse change in the significance of a historical resource, the preparation of an environmental impact report may be required (CCR Title 14(3) §15065(a)).

If the cultural resource in question is an archaeological site, CEQA (CCR Title 14(3) §15064.5(c)(1)) requires that the lead agency first determine if the site is a historical resource as defined in CCR Title 14(3) §15064.5(a). If the site qualifies as a historical resource, potential adverse impacts must be considered in the same manner as a historical resource. If the archaeological site does not qualify as a historical resource but does qualify as a unique archaeological site, then the archaeological site is treated in accordance with PRC §21083.2 (CCR Title 14(3) §15064.5(c)(3)). In practice, most archaeological sites that meet the definition of a unique archaeological resource will also meet the definition of a historical resource.²⁴ CEQA defines a “unique archaeological resource” as an archaeological artifact, object, or site about which it can be clearly demonstrated that there is a high probability that it meets one or more of the following criteria:

- Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information; or
- Has a special and particular quality such as being the oldest of its type or the best available example of its type; or
- Is directly associated with a scientifically recognized important prehistoric or historic event or person (PRC §21083.2(g)).

If an impact to a historical or archaeological resource is significant, CEQA requires feasible measures to minimize the impact (CCR Title 14(3) §15126.4 (a)(1)). Mitigation of significant impacts must

²⁴ Bass, Ronald E., Albert I. Herson, and Kenneth M. Bogdan, 1999. *CEQA Deskbook: A Step-by-Step Guide on how to Comply with the California Environmental Quality Act*. Solano Press Books, p. 105, Point Arena, California.

lessen or eliminate the physical impact that the project will have on the resource. Generally, the use of drawings, photographs, and/or displays does not mitigate the physical impact on the environment caused by demolition or destruction of a historical resource. However, CEQA requires that all feasible mitigation be undertaken even if it does not mitigate impacts to a less-than-significant level (PRC §21002.1(b)).

(2) California Register of Historical Resources (California Register). The California Register is established by California PRC §5024.1. The California Register serves as a guide to cultural resources that must be considered when a government agency undertakes a discretionary action subject to CEQA. The California Register helps government agencies identify and evaluate California's historical resources, and indicates which properties are to be protected, to the extent prudent and feasible, from substantial adverse change (PRC §5024.1(a)). Any resource listed in, or eligible for listing in, the California Register is to be taken into consideration during the CEQA process.

The California Register was modeled after the National Register of Historic Places (National Register) and the California Register significance and integrity criteria for listing historical resources are consistent with those of the National Register. A resource eligible for the National Register is also eligible for the California Register. The National Register criteria, however, have been modified for State use by the California Office of Historic Preservation to include a range of historical resources which better reflect the history of California. There are three instances in which a resource not eligible for the National Register may be eligible for the California Register: moved resources; resources achieving significance in the past fifty years; and reconstructed resources.²⁵

- *Moved buildings, structures, or objects.* A moved building, structure, or object that is otherwise eligible may be listed in the California Register if it was: (1) moved to prevent its demolition at its former location; and (2) if the new location is compatible with the original character and use of the historical resource.
- *Reconstructed buildings.* A building less than 50 years old may be eligible if it embodies traditional building methods and techniques that play an important role in a community's historically rooted beliefs, customs, and practices (e.g., a Native American roundhouse).
- *Historical resources achieving significance within the past 50 years.* Resources less than 50 years old may be considered for listing in the California Register if it can be demonstrated that sufficient time has passed to understand its historical importance.

A cultural resource is evaluated under four California Register criteria to determine its historical significance. A resource must be significant in accordance with one or more of the following criteria:

1. Is associated with events that have made a significant contribution to the broad pattern of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;

²⁵ California Office of Historic Preservation, 2006. *California Register and National Register: A Comparison (for purposes of determining eligibility for the California Register)*. Technical Assistance Series No. 6. California Department of Parks and Recreation, p. 1, Sacramento.

3. 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
4. Has yielded, or may be likely to yield, information important in prehistory or history.

Age. In addition to meeting one or more of the above criteria, the California Register requires that sufficient time must have passed to allow a “scholarly perspective on the events or individuals associated with the resource.” Fifty years is used as a general estimate of the time needed to understand the historical importance of a resource (CCR Title 14(11.5) §4852 (d)(2)). The State of California Office of Historic Preservation recommends documenting, and taking into consideration in the planning process, any cultural resource that is 45 years or older.²⁶

Period of Significance. The period of significance for a property is “the span of time when a property was associated with important events, activities, persons, cultural groups, and land uses or attained important physical qualities or characteristics.”²⁷ The period of significance begins with the date of the earliest important land use or activity that is reflected by historic characteristics tangible today. The period closes with the date when events having historical importance ended. The period of significance for an archeological property is “the time range (which is usually estimated) during which the property was occupied or used and for which the property is likely to yield important information.”²⁸ Archeological properties may have more than one period of significance.

Historic Context. The significance of cultural resources is generally evaluated using a historic context, which groups information about related historical resources based on theme, geographic limits, and chronological period.

Integrity. The California Register also requires a resource to possess integrity, which is defined as “the authenticity of a historical resource’s physical identity evidenced by the survival of characteristics that existed during the resource’s period of significance. Integrity is evaluated with regard to the following aspects: retention of location, design, setting, materials, workmanship, feeling, and association.”²⁹

Archaeologists use the term “integrity” to describe the level of preservation or quality of information contained within a district, site, or excavated assemblage. Integrity is relative to the specific significance which the resource conveys. Although it is possible to correlate the aspects of integrity, listed above, with standard archaeological site characteristics, those aspects are often unclear for evaluating the ability of an archaeological resource to convey significance under California Register criterion 4 (has yielded, or may be likely to yield, information important in prehistory or history). The

²⁶ California Office of Historic Preservation, 1995. *Instructions for Recording Historical Resources*, p. 2, Sacramento.

²⁷ National Park Service, 1999. *Guidelines for Evaluating and Documenting Rural Historic Landscapes*, p. 21, Washington, D.C.

²⁸ National Park Service, 2000:34. *Guidelines for Evaluating and Registering Archeological Properties*, p. 34, Washington, D.C.

²⁹ California Office of Historic Preservation, 2006, op. cit., p. 2.

integrity of archaeological resources, therefore, is judged according to the ability of the site to yield scientific and cultural information that can be used to address important research questions.

Eligibility. Resources that are significant, meet the age guidelines, and possess integrity will generally be considered eligible for listing in the California Register.

(3) Health and Safety Code: Human Remains. The California Health and Safety Code (HSC) §7050.5 states that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the remains are discovered has determined whether or not the remains are subject to the coroner's authority. If the human remains are of Native American origin, the Coroner must notify the Native American Heritage Commission within 24 hours of this identification. The Native American Heritage Commission will identify a Native American Most Likely Descendant (MLD) to inspect the site and provide recommendations for the proper treatment of the remains and associated grave goods.

(4) Public Resources Code: Cultural and Paleontological Resources. California PRC §5097.5 provides for the protection of cultural and paleontological resources. This PRC section prohibits the removal, destruction, injury, or defacement of archaeological and paleontological features on any lands under the jurisdiction of State or local authorities.

(5) Larkspur 1990 General Plan. The Community Character Element of the Larkspur 1990 General Plan discusses the City's goals, policies, and action programs for cultural resources. Relevant goals and policies for historical resources and archaeological resources are presented below.

Community Character Element

Goal 3: Assure the survival of Larkspur's "special sense of place."

- **Policy i:** Identify significant archaeological, historic, and natural resources representing all of the ethnic, cultural, and economic groups that have lived and worked in Larkspur.
 - **Action Program [7]:** Maintain an up-to-date inventory of existing historic resources, including artifacts, structures, sites, areas, and natural phenomena.
 - **Action Program [8]:** Maintain a City adopted list of historic, archaeological, and natural resources worthy of preservation.
 - **Action Program [9]:** Map the location of historic districts and historic and natural resources.
- **Policy j:** Safeguard and maintain significant historic, archaeological, and natural resources.
 - **Action Program [10]:** Administer the Heritage Preservation Ordinance so as to provide for the appropriate development and maintenance of historic resources and their environments.
 - **Action Program [11]:** Maintain and support the Heritage Preservation Board.
- **Policy k:** Accommodate anticipated development and population growth in ways that will not damage Larkspur's historic, archaeological, and natural resources.
 - **Action Program [13]:** Provide a quick-response mechanism for saving resources threatened by construction or demolition.

- Action Program [14]: Establish design guidelines for property owners, developers, and public agencies to use with respect to land use and building construction in areas of identified historic, archaeological, or natural significance.
- Action Program [15]: Review all public policies, and modify them as necessary, to support the policies of this chapter to protect and preserve historic, archaeological, and natural resources while protecting the general health, welfare, and safety of the public.
- Action Program [16]: Direct capital improvement programs toward protecting, preserving, rehabilitating, and enhancing archaeological, and natural resources.
- Action Program [17]: Provide local incentives for restoring and maintaining historic, archaeological, and natural resources.
- Action Program [18]: Coordinate City and other public agency programs so that the City's objectives and standards for preserving historic, archaeological, and natural resources are met.
- Action Program [19]: Use the principles and practices of land use planning to promote the preservation of historic, archaeological, and natural resources.

Goal 4: Promote a greater awareness of and sensitivity toward Larkspur's archaeological heritage.

- Policy l: The City shall cooperate with the Northwest Information Center toward the protection and preservation of artifacts in those areas already identified as containing archaeological remains.
- Policy m: The City shall cooperate with the Northwest Information Center in the development of information which will allow the prediction of additional sites likely to contain archaeological remains.
 - Action Program [21]: All development applications and public projects that require EIRs will routinely be sent to the Northwest Information Center...for review and recommendations regarding archaeological findings.
 - Action Program [22]: The City shall promote the preservation of archaeological sites by considering any significant remains in its planning for parks.
 - Action Program [23]: The City may permit land uses other than those designated on the General Plan Land Use and Circulation map on sites with archaeological merit, in order to preserve the archaeological record.
 - Action Program [24]: Where an archaeological site is in proximity to a project under review, City staff in conjunction with the Northwest Information Center will determine the particular qualities to be preserved and the methods of preservation.

(6) Larkspur Municipal Code. The City's Municipal Code includes provisions for protection and preservation of cultural resources in Chapter 15.42 (Archaeological Resources) and Chapter 18.19 (Heritage Preservation). Chapter 15.42 provides "procedures for studying and/or preserving valuable archaeological resources in the City." This chapter requires that an "archaeological investigation permit" be issued prior to the issuance of a building or grading permit in those instances where such entitlements would affect archaeological resources. Chapter 15.42 also requires that "complete and accurate" records of archaeological findings be submitted to appropriate repositories. Chapter 18.19 includes provisions "for the review, evaluation, enhancement, protection and preservation of natural phenomena, structures, sites and areas that possess unique character, special architectural appearance, historical value or which generate special aesthetic or cultural interest." This chapter allows for designation of heritage preservation combining zoning districts (H) and review by the City Heritage Preservation Board of projects that: (1) require discretionary land use permits; (2)

require building permits; (3) require grading or demolition permits for properties listed on City’s Historic Resources Inventory; or (4) are located within an “H” district.

d. Identified Cultural Resources. Recorded cultural resources within the Plan area consist of prehistoric and historical archaeological deposits, and built-environment resources associated with the local nineteenth- and early twentieth-century brick-making industry and transportation. Seven cultural resources recorded within the Plan area are listed in Table IV.J-1. These resources include two that are listed in the Larkspur Historic Resources Inventory, one of which is also listed in the National Register of Historic Places and is a California Historical Landmark. The resources in the Plan area are described below.

Table IV.J-1: Cultural Resources within the Station Area Plan Area

Address	Resource Type	Age	Status Code ^a	Comments
– ^b	Archaeological	Prehistoric	–	Midden site
– ^b	Archaeological	Prehistoric/ Historic	–	Midden site; brick-making subsurface features
– ^b	Archaeological	Prehistoric	–	Chert quarry and lithic scatter
– ^b	Archaeological	Prehistoric	–	Unrecorded Midden Site
2900 Larkspur Landing Circle	Residence	1890s	7R	Superintendent’s House for the Remillard Brick Kiln
125 E. Sir Francis Drake Blvd.	Industrial	1891	1S/1CL	Remillard Brick Kiln
–	Transportation	1912-1913; 1924	6Z	Northwestern Pacific Railroad segment and trestle

^a California Office of Historic Preservation (OHP) National Register Status (NRS) Code:

1S = Individual property listed in National Register by the Keeper. Listed in the California Register

1CL = Automatically listed in the California Register

6Z = Found ineligible for National Register, California Register, or Local designation through survey evaluation

7R = Identified in Reconnaissance Level Survey – not evaluated

^b Specific locational information for archaeological sites in the Plan area has been intentionally omitted from public documents for this project. The legal authority to restrict cultural resource information is in California Government Code Section 6254.10 and 6254(r).

Source: Compiled by LSA Associates, Inc., 2012.

(1) Archaeological Sites. Four archaeological resources have been identified within the Plan area.³⁰ Additional prehistoric and/or historical archaeological resources may be located within the Plan area, and project-specific reviews would be needed to assess potential impacts to archaeological sites. Prehistoric archaeological deposits can be associated with buried Holocene landforms, and the absence of surface materials or soils indicative of an archaeological deposit does not preclude the possibility of significant subsurface archaeological deposits.

³⁰ Specific locational information for archaeological sites in the Plan area has been intentionally omitted from public documents for this project. The legal authority to restrict cultural resource information is in California Government Code Section 6254.10 and 6254(r).

Archaeological sites in the Plan area include midden deposits (i.e., soils indicative of human occupation); human remains; and a lithic scatter and prehistoric quarry. Archaeological sites in the Plan area are briefly described below.

- **CA-MRN-78 (Primary #P-21-000108).** CA-MRN-78 was recorded in 1907 by archaeologist Nels Nelson as a “shellmound.” As described by Nelson in 1907, the site had been “leveled out by cultivation. It covers at present an area approximating 200 ft. in diameter, and may be 3-4 ft. deep. The material is . . . rather finely broken up.” Nelson did not note any bones or artifacts in his site record but concluded that these “are doubtless present.”
- **CA-MRN-255/H (Primary #P-21-000541).** This site was originally recorded by archaeologist Adan Treganza in 1955 as a shellmound. Treganza estimated the site’s area as 300 feet by 300 feet and approximately six-feet deep. Subsequent to Treganza’s recordation, several archaeological studies were conducted at the site in the 1970s-1980s.³¹ These studies included surface survey, test excavations to determine the site’s dimensions and composition, and construction monitoring. These archaeological studies identified a previously unrecorded subsurface historic component CA-MRN-255/H that included the remains of late nineteenth-century batch or “beehive” type kilns associated with the area’s brick-making industry. In the late 1990s, Holman & Associates initiated investigations at CA-MRN-255/H that included data recovery of a portion of the site to mitigate effects from a project affecting the resource. These investigations yielded 3,752 cataloged prehistoric and historical artifacts, a prehistoric occupation surface, Native American graves, a prehistoric shellfish roasting pit, a brick kiln floor, and other historic materials associated with brick making.³²
- **CA-MRN-525 (Primary #P-21-000458).** This site was recorded in 1982 by the College of Marin as a prehistoric chert quarry. The site’s area was recorded as approximately 30 square meters and is of an “undeterminable” depth. Artifacts observed include chert flakes and cores, and an obsidian biface.
- **Unrecorded Site.** Archaeologist Thomas L. Jackson reported a prehistoric midden site in the Plan area in 1976. Mr. Jackson noted the site in a letter report that assessed a proposed development’s impacts on the site.³³ The site, which was never formally recorded on California Department of Parks and Recreation forms and has not been assigned a trinomial or primary number by the State, was described by Jackson as “a narrow band of midden defined by fragments of shell and whole shells, fire fractured rock and other lithic debris in a light brown soil matrix.”

(2) **Historic Built Environment.** Based on a review of the Directory of Properties in the Historic Property Data File, the City of Larkspur Historic Resources Inventory, and a Historic Resources Evaluation Report³⁴ prepared for the Central Marin Ferry Connection Project, there are

³¹ Bieling, David G., 2000, op. cit.

³² Ibid.

³³ Jackson, Thomas, 1976. Written communication to Mr. Dwight Winther, City of Larkspur Planning Director. August 10.

³⁴ Webb, Toni, 2010. *Historical Resources Evaluation Report, Central Marin Ferry Connection, Marin County, California, Phase I.* JRP Historical Consulting, LLC, Davis, California.

three recorded built-environment resources in the Plan area. These resources are briefly described below.

- **Green Brae Brick Yard of the Remillard Brick Company.** The Green Brae Brick Yard of the Remillard Brick Company (Remillard Brick Kiln) at 125 E. Sir Francis Drake Boulevard was listed in the National Register of Historic Places in 1978, is State Historic Landmark #917, and is listed in the California Register of Historical Resources. It is also listed in the City’s Historical Resources Inventory. The Remillard Brick Kiln operated from 1891 to 1915. The Remillard Brick Kiln is the only surviving structure of the Remillard Brick Company and is also one of the few remaining Hoffman Type kilns in the United States. A Hoffman kiln – developed by Friedrich Hoffman in 1865 in Prussia – revolutionized brick making as it allowed for continuous firing of bricks whereas earlier “batch-type” kilns required cooling before new bricks were introduced.

As described in the National Register nomination,

“The structure is unusual and complex in that there are double walls filled with earth, an underground flue system, arched ceilings and openings made with wedge bricks and a roof pierced with hundreds of ports. The chimney stack is of exceptional design having a square base and tapered octagonal sides with a corbelled top, freestanding from the kiln itself, an unusual arrangement ... The Remillard brick kiln is significant as an historical engineering landmark, representing a manufacturing process that was considered the best of its time in the important industry of brickmaking.”

- **Superintendent’s House.** The circa 1890s Superintendent’s House at 2900 Larkspur Landing Circle is listed in the City’s Historic Resources Inventory and has been assigned a California Historical Resource Status Code of “7R” in the Directory of Properties in the Historic Property Data File, indicating that the resource was identified in a reconnaissance-level survey but has not been formally evaluated for its eligibility for listing in either the National Register or California Register. The house was associated with a small community of workers at the Green Brae Brick Yard and is the only residence remaining from that operation. The building is a one-story Victorian Stick style residence with wood shiplap cladding.
- **Northwestern Pacific Railroad.** In 2009, JRP Historical Consulting, LLC (JRP) recorded a 0.5-mile discontinuous segment of the Northwestern Pacific (NWP) Railroad. This abandoned segment of railroad roughly parallels Highway 101 North and extends from a wood trestle at approximately post mile (PM) 14.7 near Corte Madera Creek northward to approximately PM 15.3. The original rail alignment at this location was constructed in 1884 by San Francisco and San Rafael Railroad and was a single-track, standard-gauge line that connected with San Francisco Bay ferry service. After NWP incorporated in 1907, it installed double tracks along its alignments, and this section of railroad was upgraded in 1912-1913. In the 1920s, NWP spent over \$800,000 modernizing its holdings in Marin County, and in 1924 the wood trestle near Corte Madera Creek was constructed.³⁵ JRP evaluated this segment of the NWP Railroad for its eligibility for listing in the National and

³⁵ Ibid.

California registers and found that the resource does not meet any of the criteria for listing in these registers due to a lack of historical significance.

(3) Native American Sacred Lands. According to the Native American Heritage Commission's review of their Sacred Lands File, no reported Native American sacred sites are within the Plan area. Debbie Pilas-Treadway, NAHC Environmental Specialist III, responded in a faxed letter on June 19, 2012, that a review of the Sacred Lands File did not "indicate the presence of Native American cultural resources in the immediate project area." The potential for Native American sacred sites in the Plan area, however, cannot be discounted, and project-specific reviews should be done with FIGR to verify the presence of sacred sites.

2. Impacts and Mitigation Measures

The following section describes potentially significant project impacts to cultural resources. Mitigation measures are identified to avoid, minimize, or mitigate such impacts, where possible.

a. Criteria of Significance. Implementation of the Station Area Plan would have a significant impact if it were to result in:

- The direct or indirect destruction of a unique paleontological resource or site or a unique geological feature;
- The physical demolition, destruction, relocation, or alteration of a unique archaeological resource;
- A substantial adverse change in the significance of a historical resource that is either listed or eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, a local register of historic resources, or any cultural resource that is not listed in, or not eligible for listing in, a federal, state, or local historical register but is otherwise determined by the City to be historically significant; or
- The disturbance of any human remains, including those interred outside of formal cemeteries.

b. Impacts Analysis. The following sections provide an evaluation and analysis for the potential significant and cumulative impacts of the Station Area Plan for each of the criteria of significance listed above.

(1) Paleontological Resources. Implementation of the Station Area Plan has the potential to significantly impact unique paleontological resources (fossils). Although a review of the University of California Museum of Paleontology online database does not indicate recorded fossils in the Plan area, the presence of Franciscan Formation deposits, which are known to contain fossils, within the Plan area indicates paleontological sensitivity.

Neither the Station Area Plan nor the current General Plan (1990) contain policies that address potential impacts to paleontological resources. Additionally, the City's Code does not include provisions to preserve, or mitigate impacts to, these resources. Therefore, adoption of the Station Area Plan has the potential to have a significant impact on paleontological deposits as a result of new ground-disturbing development or redevelopment that may occur.

Impact CULT-1: Ground-disturbing activities associated with new development and redevelopment allowed under the Station Area Plan could adversely affect significant paleontological deposits. (S)

With implementation of this mitigation measure, this impact would be reduced to a less-than-significant level on a program-level basis.

Mitigation Measure CULT-1: The following language shall be included as a Condition of Approval for projects associated with implementation of the Station Area Plan:

- If paleontological resources are encountered during project subsurface construction, all ground-disturbing activities within 25 feet shall be redirected and a qualified paleontologist contacted to assess the situation, consult with agencies as appropriate, and make recommendations for the treatment of the discovery. Project personnel shall not collect or move any paleontological materials. Paleontological resources include fossil plants and animals, and trace fossil evidence of past life such as tracks. Ancient marine sediments may contain invertebrate fossils such as snails, clam, and oyster shells; sponges; and protozoa; and vertebrate fossils such as fish, whale, and sea lion bones. Vertebrate land mammals may include bones of mammoth, camel, saber tooth cat, horse, and bison. Paleontological resources also include plant imprints, petrified wood, and animal tracks. (LTS)

(2) Archaeological Resources. Implementation of the Station Area Plan has the potential to significantly impact unique archaeological deposits. As discussed previously, the Plan area includes recorded prehistoric archaeological deposits, and there is a potential for significant historic-period archaeological deposits associated with the local nineteenth- and early twentieth-century brick-making industry. New development and redevelopment projects would occur under the Station Area Plan, which have the potential to destroy prehistoric and historical archaeological deposits, including previously unidentified subsurface deposits. Prehistoric archaeological sites, in addition to having the potential to contain important information on the past, may also have cultural and religious importance to FIGR.

The Station Area Plan contains no policies that address potential impacts to archaeological deposits. The City's current General Plan (1990) and Municipal Code, however, include provisions to preserve, or mitigate impacts to, these deposits. These provisions include: (1) Goal 4 (Policies l and m) of the Community Character Element of the General Plan, which encourages cooperation with the NWIC to identify areas of archaeological sensitivity and Action Programs that encourage preservation of the archaeological record; and (2) Chapter 15.42 (Archaeological Resources) of the City's Municipal Code, which provides "procedures for studying and/or preserving valuable archaeological resources in the City." Additional guidance is also included below in Mitigation Measure CULT-2 in the event that archaeological resources are accidentally unearthed during implementation of the Station Area Plan.

Impact CULT-2: Ground-disturbing activities associated with new development and redevelopment allowed under the Station Area Plan could adversely affect archaeological resources. (S)

With implementation of this mitigation measure, this impact would be reduced to a less-than-significant level on a program-level basis.

Mitigation Measure CULT-2: The following language shall be included as a Condition of Approval for projects associated with implementation of the Station Area Plan:

- If deposits of prehistoric or historical archaeological materials are encountered during project activities, all work within 25 feet of the discovery should be redirected and a qualified archaeologist contacted to assess the situation, consult with agencies as appropriate, and make recommendations for the treatment of the discovery. Project personnel should not collect or move any archaeological materials. Archaeological materials can include flaked-stone tools (e.g., projectile points, knives, and choppers) or obsidian, chert, basalt, or quartzite toolmaking debris; bone tools; culturally darkened soil (i.e., midden soil often containing heat-affected rock, ash and charcoal, shellfish remains, bones, and other cultural materials); and stone-milling equipment (e.g., mortars, pestles, and handstones). Prehistoric archaeological sites often contain human remains. Historical materials can include wood, stone, concrete, or adobe footings, walls, and other structural remains; debris-filled wells or privies; and deposits of wood, glass, ceramics, metal, and other refuse.
- In the event that archaeological deposits are encountered during implementation of the Station Area Plan, it is recommended that adverse effects be avoided by project activities. If such deposits cannot be avoided, they should be evaluated for their California Register of Historical Resources eligibility. If the deposit is not eligible, a determination shall be made as to whether it qualifies as a “unique archaeological resource” under CEQA. If the deposit is neither an historical nor unique archaeological resource, avoidance is not necessary. If the deposit is eligible to the California Register, or is a unique archaeological resource, it will need to be avoided by adverse effects or such effects must be mitigated. Adverse effects will be mitigated through the implementation of a treatment plan developed in consultation with the City. Mitigation may consist of, but is not necessarily limited to, systematic recovery and analysis of archaeological deposits; recording the resource; preparation of a report of findings; and accessioning recovered archaeological materials at an appropriate curation facility. The report shall be submitted to the City for review and the Northwest Information Center at Sonoma State University.
- If prehistoric archaeological deposits are identified, the City shall consult with FIGR regarding preparation of a Treatment Plan.
- The City shall consult with the Federated Indians of Graton Rancheria (FIGR) prior to development of projects associated with implementation of the Station Area Plan regarding preparation and execution of a Treatment Plan. The Treatment Plan will identify procedures for the use of tribal monitors, and the appropriate treatment of Native American cultural materials and human remains identified during implementation of the Station Area Plan.

Overall, the existing General Plan policies, the City Municipal Code, and Mitigation Measures CULT-2a and CULT-2b would reduce impacts to archaeological resources to a less-than-significant level on a program-level basis. Appropriate application of existing City policies and regulations to avoid impacts to archaeological resources would need to be determined on a project-specific basis. (LTS)

(3) Historical Resources. The Plan area includes two historical resources: the Remillard Brick Kiln at 125 E. Sir Francis Drake Boulevard and the associated Superintendent’s House at 2900 Larkspur Landing Circle. Both of these properties qualify as “historical resources” pursuant to *CEQA Guidelines* Section 15064.5(a)(1)-(2). Implementation of the Station Area Plan will allow for new land uses, development, and redevelopment in the Opportunity Sites described in the Project Description of this EIR. Although there are no project-specific proposals to demolish these resources, the potential for indirect effects (i.e., adverse effects to historical setting from adjacent construction, relocation, or inappropriate modifications) cannot be discounted. The City’s Heritage Preservation chapter of its Municipal Code, however, contains policies that will mitigate potential adverse impacts to these historical resources. The Heritage Preservation ordinance requires City Heritage Preservation Board (Board) review of projects requiring a discretionary land use permit, a building permit, or a grading or demolition permit for properties listed in the City Historic Resources Inventory. The Board is responsible for determining that: (1) the proposed work will be compatible with the exterior architectural character of the historical resources; (2) the proposed work will maintain the integrity of the historical resources; (3) the proposed work will not significantly diminish public view of the historical resources; (4) the proposed work will not adversely affect the historic, architectural, or aesthetic character of the neighborhood; and (5) the proposed work will comply with Federal, State, and City standards for the rehabilitation or modification of historical resources.

With implementation of these existing policies, therefore, the Station Area Plan would have less-than-significant impacts on built environment historical resources and no additional mitigation measures are required.

Under CEQA, archaeological sites can also qualify as historical resources (*CEQA Guidelines* Section 15064.5(c)). For purposes of this discussion, however, the impacts of the Station Area Plan to archaeological sites is discussed above.

(4) Human Remains. Implementation of the Station Area Plan has the potential to significantly impact human remains interred outside formal cemeteries. Typically, such human remains are associated with prehistoric archaeological habitation sites, (e.g., shell middens). As discussed previously, the Plan area includes recorded prehistoric archaeological deposits, including CA-MRN-255/H, which is known to contain Native American human remains. New development and redevelopment projects would occur under the Station Area Plan, which have the potential to destroy prehistoric archaeological deposits, including associated human remains.

As noted previously in the discussion for Archaeological Resources, the Station Area Plan contains no policies that address potential impacts to archaeological deposits, including those that contain human remains. The City’s current General Plan (1990) and Municipal Code, however, include provisions to preserve, or mitigate impacts to, archaeological deposits that include Native American human remains. These provisions include: (1) Goal 4 (Policies l and m) of the Community Character Element of the General Plan, which encourages cooperation with the NWIC to identify areas of archaeological sensitivity and Action Programs that encourage preservation of the archaeological record; and (2) Chapter 15.42 (Archaeological Resources) of the City’s Municipal Code, which provides “procedures for studying and/or preserving valuable archaeological resources in the City.” Overall these existing General Plan policies; City Municipal Code; application of the appropriate procedures outlined under California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98 regarding the treatment of human remains; and implementation of

Mitigation Measures CULT-2a and CULT-2b would contribute to reducing impacts to human remains to less-than-significant levels. Appropriate application of existing City and State policies and regulations to avoid impacts to human remains would need to be determined on a project-specific basis.

c. Cumulative Impacts of the Station Area Plan. Implementation of the Station Area Plan, in conjunction with other development in the City, has the potential to cumulatively impact cultural resources. For built-environment historical resources, proposed developments could adversely affect such resources due to more intensive land uses and incompatible site designs, which could impact a resource's historical integrity. Development within the Plan area also has the potential to adversely affect archaeological resources, paleontological resources, and human remains through their destruction or disturbance. Before mitigation or application of relevant City guidance or policies, development within the Plan area, as well as other local recent and current developments, has the potential to cause adverse cumulative impacts to cultural resources due to their destruction or loss of historical integrity.

However, it should be noted that each development proposal received by the City will undergo environmental review, as outlined in the actions and policies of the current General Plan and Archaeological Resources and Heritage Preservation chapters of the Municipal Code. Neither implementation of the Station Area Plan, nor other development projects, are expected to cumulatively result in significant impacts to cultural resources, provided that appropriate predevelopment environmental review occurs (i.e., by coordinating with the NWIC, as described in the current General Plan) and appropriate project-specific mitigation measures, including but not limited to preservation in place, capping, data recovery, or compliance with the recommendations of the City's Heritage Preservation Board, are implemented as a condition of development. Therefore, implementation of project-specific mitigation measures and appropriate City policies and actions encouraging environmental review and mitigation reduce any potential cumulative impacts related to cultural resources to a less-than-significant level.