

5.13 CULTURAL RESOURCES

This section addresses the ways in which prehistoric and historic cultural resources found in El Dorado County could be affected by future development projects and offers mitigation for those impacts. A consideration of potential effects on cultural resources relies heavily on qualitative assessments of numerous factors such as the nature of landforms, nearby water sources, proximity of floral and faunal species, presence of mineral resources, and timber type and quantity.

Potential impact on cultural resources in El Dorado County were assessed using two main research techniques. First, records maintained by the North Central Information Center (NCIC) of the California Historical Resources Information System (CHRIS) at California State University, Sacramento, were examined to gain an overview of the location and nature of archaeological and historic sites in the county. Second, prime factors affecting prehistoric and historic land use patterns were considered based on an examination of the elements of various archaeological predictive models (Berry 1984; Heizer and Baumhoff 1956; Judge and Sebastien 1988; Kohler 1988; Kvamme 1985; Plog and Hill 1971; Trigger 1968; Williams et al. 1973). Based on this research, it is appropriate to conclude that in general, areas exhibiting slopes of less than 25% within 100 feet of a natural perennial water source are the most sensitive and likely to contain at least prehistoric sites, features, or artifacts.

A discipline frequently associated with cultural sites and artifacts is paleontology. Paleontology is the study of the remains, typically fossilized, of various plant or animal species such as dinosaurs and early mammals and not the traces of human cultural activity or human remains themselves. Paleontological remains are found in sedimentary rock formations. El Dorado County's geology is predominantly igneous (volcanic) in nature and the type of sedimentary deposits where such remains might be present are virtually nonexistent. No comprehensive paleontological studies have been conducted within the county and, as a result, no information is available regarding the sensitivity of certain areas in El Dorado County to contain such resources. While paleontological finds could occur in river and stream gravel deposits within the county, this possibility would not be expected and is remote. Consequently, paleontology is an area of research and concern generally not applicable to the county.

5.13.1 EXISTING CONDITIONS

PHYSICAL ENVIRONMENT

With elevations ranging between 200 feet in the western portion of the county to more than 10,000 feet in the Sierra Nevada to the east, El Dorado County possesses a varied range of

ecological zones that have supported diverse prehistoric and historic peoples for thousands of years. In addition to this ecological diversity, the rich deposits of mineral resources, stands of timber, and lush grasslands made the county an attractive location for the development of various industrial pursuits in historic times. Native American occupation and these economic endeavors have left their mark on the landscape and reflect the important role that El Dorado County played in the development of the state of California and of the United States as a whole.

More than 1,300 prehistoric and historic cultural resources had been documented within the county as of 2002. Eleven of these resources, including individual buildings, sites and Historic Districts, are currently listed on the National Register of Historic Places (NRHP) and California Register of Historic Places (CRHR) (see Table 5.13-1 under History below). An additional 79 resources have been determined to be NRHP and CRHR eligible but have not yet been formally listed. Records of each of these sites are curated at the NCIC. In addition to these documented cultural resources, there are 26 State Historic Landmarks situated in unincorporated El Dorado County (see Table 5.13-2 under History below).

Table 5.13-1		
NRHP/CRHR Listed Properties in Unincorporated El Dorado County		
Property Name	Location (Town)	Listing Date
Bayley House	Pilot Hill	1978
Town of Coloma	Coloma	1966
Crawford Ditch	Pleasant Valley	1991
Eddy Tree Breeding Station	Placerville vicinity	1987
Lombardo Ranch	Placerville vicinity	1987
Sugar Pine Point State Park	Homewood	1973
Tahoe Meadows	South Lake Tahoe vicinity	1990
Vikingsholm	South Lake Tahoe vicinity	1996
Source: National Park Service 2003, CRHR 2003		

**Table 5.13-2
California State Historic Landmarks Located in Unincorporated El Dorado County**

No.	Landmark	Location (Town)
143	Marshall Monument	Coloma
319	Marshall's Blacksmith Shop	Kelsey
456	Shingle Springs	Shingle Springs
484	Town of Georgetown	Georgetown
486	Town of El Dorado ("Mud Springs")	El Dorado
487	Town of Diamond Springs	Diamond Springs
521	Town of Greenwood	Greenwood
530	Gold Discovery Site	Coloma
551	California's First Grange Hall	Pilot Hill
569	Mormon Island	NE of Folsom
570	Negro Hill	NE of Folsom
571	Salmon Falls	NE of Folsom
572	Condemned Bar	NE of Folsom
699	Mormon Tavern-Pony Express Route	Clarksville
700	El Dorado-Nevada House-Pony Express Route	El Dorado
701	Placerville-Pony Express Route	Placerville vicinity
703	Pleasant Grove House-Pony Express Route	Rescue
704	Sportsman's Hall-Pony Express Route	Cedar Grove
705	Moore's (Riverton)-Pony Express Route	Kyburz
706	Webster's (Sugar Loaf House)-Pony Express Route	Kyburz
707	Strawberry Valley House-Pony Express Route	Kyburz
708	Yank's Station-Pony Express Route	Meyers
747	Coloma Road (Rescue)	Rescue
748	Coloma Road (Coloma)	Coloma
815	Wakamatsu Tea and Silk Farm Colony	Gold Hill

Source: CRHR 2003

Prehistory

In California, manifestations of prehistoric material culture can be categorized according to “patterns” or “horizons” with each incorporating distinctive technological, economic, social, and ideological elements. Early research resulted in the development of the Central California Taxonomic System and a tripartite Horizon classification scheme (Early, Middle, Late). Although these broad temporal and cultural periods have been further subdivided (cf. Scheme B1, Bennyhoff and Hughes 1987), they are also referred to as Windmill, Berkeley, and Augustine patterns and are briefly described below. Although Native American occupation in the county may date to as early as 10,000 to 12,000 years ago (Anderson 2000, Engelbrecht and Seyfart 1994, Feidel 2000, Gamble 1994, Meltzer 1995, Yesner 1996), the best documented evidence for human occupation in the general region is found among sites exhibiting traits characteristic of the Windmill Pattern or Early Horizon. Such sites date to as early as 4,750 years Before Present (BP) and as late as 2,500 years BP, and frequently contain numerous mortar fragments, indicating that acorns and/or various seeds were relatively important food items (Moratto 1984). However, the remains of numerous faunal species are often found on Windmill sites, and the presence of angling hooks and pottery artifacts possibly used as net or line sinkers indicates a varied and efficient subsistence system (Fredrickson 1973; Heizer 1949, Schulz 1970; Ragir 1972).

Windmill sites also show that a great deal of trade was taking place; obsidian, Haliotis, and Olivella shell beads and ornaments, quartz crystals, and other exotic materials are frequently found on these sites (Heizer 1949, Moratto 1984). These seasonal migrations may have involved population shifts to higher elevations during the summer with winter occupations being in the valley (Moratto 1984).

Sites from the later Berkeley Pattern or Middle Horizon (2,500–1,450 years BP) are often quite similar to Windmill sites. Features such as the use of red ocher in burial contexts, cobble mortars, “charmstones,” and lanceolate point styles can be found during both periods. (Elsasser 1978, Johnson 1971, Moratto 1984.) However, during this time, a much heavier reliance on acorns as a staple food develops as evidenced by an increased number of mortars and pestles in the archaeological record. Distinctive artifacts and radiocarbon dates from sites associated with the Berkeley Pattern suggest that these cultural manifestations may represent a Proto-Miwok population movement from the San Francisco Bay area to the Central Valley and Sierra foothill environments.

First appearing in the archaeological record around 1,400 years BP and extending to proto-historic times, manifestations of the Augustine Pattern or Late Horizon indicate that intensive fishing, hunting, and acorn gathering supported large, dense populations. Highly

developed exchange systems had evolved and mortuary practices with elaborate ceremonialism indicate a well-stratified society. Earlier Augustine Pattern sites, however, still bear many similarities to the Berkeley Pattern, suggesting that the Augustine Pattern represents elements of local innovation and a blending of traits with the Middle Horizon (Fredrickson 1973; Jackson and Schulz 1975; Johnson 1977; Moratto 1984).

Early Native American occupation has resulted in sites being distributed throughout the county, and stone tool scatters, midden deposits, and small campsites can be found in many areas, particularly where natural water sources are located. In general, such evidence is comparatively subtle, although more substantial traces of intensive prehistoric occupation and activities can be seen in stone quarries and bedrock mortars and large village sites with house pits. Prehistoric artifacts, features, and sites are found throughout the county, although larger sites and more dense midden and artifact deposits tend to occur at lower elevations in the Sierra foothills.

Ethnography

Before the arrival of large numbers of people of European descent beginning in the mid-19th century, three main groups of Native Americans inhabited El Dorado County. The Nisenan (or “Southern Maidu”) occupied the northern portion of the county in an area stretching from Folsom Reservoir to just west of Lake Tahoe and about as far south as several miles south of present-day U.S. Highway 50 (U.S. 50). (Dixon 1905; Kroeber 1925, 1929, 1932; Moratto 1984; Wilson and Towne 1978.) Eastern Miwok peoples lived in a region generally south of U.S. 50, stretching from near Latrobe in the west to the vicinity of Strawberry in the east (Bennyhoff 1977, Moratto 1984). The higher elevation areas to the west and south of Lake Tahoe were occupied by the Washoe people (Kroeber 1925).

Culturally, the Nisenan and Miwok possessed a wide range of political, economic, and technological systems that clearly differentiated the two groups. However, they shared many basic traits with one another, particularly in terms of settlement and subsistence patterns. Both the Nisenan and Miwok, at least in the foothill sections of El Dorado County, relied heavily on various species of acorns as a staple food source. Ample evidence for their heavy exploitation of acorns can be found in the bedrock and boulder mortars found throughout the region that were used from prehistoric times until well after extensive European contact in the middle of the 19th century. Political structure, religious and ceremonial practices, and overall worldview all share basic similarities, yet each group maintained a distinctive cultural identity (Beals 1933; Kroeber 1925; Wilson and Towne 1978).

Largely because they inhabited ecological zones so different from much of the Nisenan and Miwok areas, the Washoe adopted somewhat different economic, subsistence, settlement, and technological systems. For example, while the Nisenan and Miwok relied heavily on the acorn as a staple food, the Washoe exploited a wide variety of flora including camas bulbs, bitterroot, tule, cattail, wild rye, and pine nuts (d'Azevedo 1986, Kroeber 1925). Bedrock mortars are also found in Washoe areas, but they tend to be shallower and far less numerous than at lower elevations in El Dorado County, reflecting less exploitation of food resources requiring extensive processing.

The types of resources associated with ethnographic or early historic periods of Native American occupation in the county differ little from those noted for later prehistoric periods. Sites and activity areas were still located in well-watered level areas and bedrock mortars were used for food processing until fairly recent times. Ethnographic village sites frequently exhibit large subterranean structure remains or house pits and can be more readily visible than the remnants of earlier Native American cultures and periods.

History

Although earlier Euroamerican explorations and incursions into the El Dorado County area were taking place before the discovery of gold in Coloma in 1848, intensive immigration to the region began only after the announcement of the find. The first mining camps dating to the first months and years of the Gold Rush were almost exclusively temporary settlements consisting of nothing more than tents and portable structures; larger centers such as Placerville, El Dorado, and Diamond Springs soon developed into permanent towns with schools, stores, hotels, mills, substantial homes, and formal roadways and continue to serve as economic and cultural centers in the county. Evidence of more than a century of placer and hard rock mining can include tailing piles, ditches, dams, prospect pits, mine shafts, roads, rail grades, mills, etc., and can be found throughout the county. Apart from the physical remains of its Gold Rush history, county place names such as China Diggins', Irish Creek, Frenchtown, Negro Hill, New York Creek, and Chili (sic) Bar reflect the influence of a wide range of ethnic groups and immigrant populations that contributed to the cultural foundations of the region.

Although gold mining may have been the primary economic pursuit in the 1840s and 1850s, many immigrants soon began to engage in logging, farming, and ranching enterprises. Many of these pursuits initially focused on supporting the miners and the mining industry. However, as the most easily mined gold deposits played out, ranching, agriculture, and especially the timber industry soon developed into stable and widespread endeavors, forming a diverse regional economy. As timber harvesting became widespread and industrialized in the latter decades of the 19th century, temporary logging camps became familiar features on

the landscape, particularly at higher elevations where dense stands of valuable fir and pine existed. These camps moved with the cutting and tent platforms; traces of temporary structures and refuse deposits associated with these camps can be found throughout the county. More substantial logging-related sites in the county include log chutes, mills, and narrow-gauge rail grades such as the Camino Michigan-California line (1903), the Diamond and Caldor line (1902) and the Camino, Placerville and Lake Tahoe line (1904).

With the increasing popularity of Lake Tahoe as a recreation destination in the late 19th century, and the formation of the Eldorado National Forest in 1910, the Mormon Emigrant Trail, the Carson Emigrant Trail, the Pony Express Trail and other lesser-known routes evolved into more developed roadways. State Route (SR) 88 and U.S. 50 roughly follow some of these trails. Former Pony Express stations such as the Sportsman's Hall in Pollock Pines still exist today and small settlements such as Kyburz and Strawberry sprang up to serve travelers to the National Forest and the Lake Tahoe Basin. Some of the buildings in these towns, and the roadways and associated structures still visible, represent some of the more prominent transportation-related cultural resources in the county.

REGULATORY/PLANNING ENVIRONMENT

Cultural resources in California are protected by a number of federal, state, and local regulations, statutes, and ordinances. Management of cultural resources within the state is guided in large part by the provisions of CEQA and the National Historic Preservation Act (NHPA) of 1966. Because these programs are interrelated they are discussed together.

The NHPA includes and provides for:

- < the Advisory Council on Historic Preservation (ACHP), which is authorized by the Secretary of the Interior to maintain the NRHP;
- < approval by the Secretary of the Interior of state historic preservation programs that provide for a State Historic Preservation Officer (SHPO); and
- < a National Historic Preservation Fund program.

Section 106 of the NHPA requires that federal agencies take into account the effects of their actions on properties that may be eligible for or listed on the NRHP, and afford the ACHP a reasonable opportunity to comment. To determine whether an undertaking could affect NRHP-eligible properties (of which there are currently 79 in El Dorado County), all cultural sites that could be affected must be inventoried and evaluated for inclusion on the NRHP.

CEQA has a much more broad and far-reaching environmental regulatory framework than the NHPA, but it also includes cultural resources as an important component. Before discretionary projects are approved, the potential for significant impacts of the project on archaeological and historical resources must be considered under CEQA (§§21083.2 and 21084.1) and State CEQA Guidelines (CCR §15064.5).

Resource Significance

The significance of an archaeological or historic resource as per the NHPA and State CEQA Guidelines is an important consideration in terms of its management. Listing, or eligibility for listing, on the NRHP and/or the CRHR is the primary consideration in whether or not a resource is subjected to further research and documentation. A determination of whether a property is listed on the NRHP is made by the Keeper of the Register of the Advisory Council on Historic Preservation. Decisions on whether a property is formally listed on the CRHR are made by a nine-member State Historical Resources Commission. Members of the commission include recognized professionals in archaeological, historical, and ethnographic fields. The State Historical Resources Commission also reviews NRHP applications and provides recommendations to the Keeper.

While public agencies are required to consider the effects of their actions on properties listed on the NRHP/CRHR, no comparable provisions exist for listed properties owned by private individuals, organizations, or agencies. Consequently, the preservation of such properties or the mitigation of potentially adverse impacts are not required. This can, and has, resulted in listed properties being altered to such an extent that their historical importance is significantly diminished or destroyed altogether. The same is true of properties noted as California State Historic Landmarks, which can include sites, buildings, and other locations listed on the NRHP/CRHR. However, the California State Historic Landmarks can represent general areas or broad topographic features and locations that do not necessarily qualify as discreet properties or “sites.” This is the case with Landmarks such as entire towns (e.g., Georgetown), a transportation corridor (the Pony Express route), or a location (Negro Hill). These Landmarks, unless owned by a public agency or listed on the NRHP/CRHR and subject to impacts resulting from the actions of a public agency, receive no further protection beyond that provided for in CEQA and Section 106 of the NHPA.

Many prehistoric and historic cultural resources in El Dorado County have been determined eligible or likely are eligible for inclusion on the CRHR and the NRHP. Each register uses similar criteria and sites eligible for CRHR listing are also potentially eligible for inclusion on the NRHP. Private or public owners of listed properties may be eligible to receive financial incentives for preservation or restoration. On a national level, for example, incentive

programs in the form of insured loans for the preservation of NRHP-listed properties are outlined in Section 106 of the NHPA.

Determining the CRHR eligibility of historic and prehistoric properties is guided by CCR §§15064.5(b) and Public Resources Code (PRC) §§21083.2 and 21084.1. NRHP eligibility is based on similar criteria outlined in Section 106 of the NHPA (16 U.S. Code [USC] 470). In both the CRHR and NRHP, cultural resources are defined as buildings, sites, structures, or objects that may have historical, architectural, archaeological, cultural, or scientific importance. A cultural resource may be eligible for listing on the CRHR and/or NRHP if it:

- < is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- < is associated with the 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.

In California, if a prehistoric or historic resource does not necessarily meet any of the four CRHR criteria, but does meet the definition of a "unique" site as outlined in PRC §21083.2, it may still be treated as a significant resource. This is the case if it is

... an archaeological artifact, object or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- < it contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information,
- < it has a special and particular quality such as being the oldest of its type or the best available example of its type, or
- < it is directly associated with a scientifically recognized important prehistoric or historic event.

Native American Human Remains

CEQA also provides for the protection of Native American human remains (CCR §15064.5[d]) and for the accidental discovery of cultural resources (CCR §15064.5[e]). These are particularly important provisions in that they take into account the possibility that significant resources not noted as a result of previous research efforts may be present within a project area and need to be treated in a way commensurate with CEQA standards.

Native American human remains are also protected under the Native American Graves Protection and Repatriation Act of 1990 (NAGPRA) (25 USC 3001 et seq.), which requires federal agencies and certain recipients of federal funds to document Native American human remains and cultural items within their collections, notify Native American groups of their holdings, and provide an opportunity for repatriation of these materials. This act also requires plans for dealing with potential future collections of Native American human remains and associated funerary objects, sacred objects, and objects of cultural patrimony that might be uncovered as a result of development projects overseen or funded by the federal government.

In 2001 Assembly Bill (AB) 978 enhanced the reach of NAGPRA and established a state commission with statutory powers to assure that federal and state laws regarding the repatriation of Native American human remains and items of patrimony are fully complied with. In addition, AB 978, as opposed to NAGPRA, includes non-federally recognized tribes for repatriation.

County Cultural Resource Management

Numerous County and private organizations and commissions have endeavored to heighten public awareness of El Dorado County's prehistoric and historic cultural heritage and to preserve and manage numerous cultural resource sites in the area. These include the County Historical Museum, County Historical Society, and County Pioneer Cemetery Commission. These organizations and commissions serve in an advisory capacity to the county and contributed to some of the policies discussed in this document. The County Cultural Resource Preservation Commission, also involved in the formulation of the General Plan policies, was recently disbanded by the County. The County Board of Supervisors has formed a subcommittee to work on development of a new ordinance dealing with cultural resources.

5.13.2 ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

THRESHOLDS OF SIGNIFICANCE

The General Plan would result in a significant impact if development would disrupt or adversely affect any of the following:

- < a prehistoric or historic archaeological site or property of historic or cultural significance to a community or ethnic social group;
- < a prehistoric or historic archaeological site determined to be an “important archaeological resource” as defined in the CEQA Guidelines;
- < a property that is listed or eligible for listing on the CRHR or NRHP; or
- < any human remains, historic or prehistoric, including those interred outside of marked formal cemeteries.

Impact
5.13-1

Destruction or Alteration of Known and Unknown Prehistoric and Historic Sites, Features, Artifacts, and Human Remains. Development under the General Plan would adversely affect the integrity and importance of known and unknown and historic cultural resources and human remains located in the county. This impact is considered **significant** for all four equal-weight alternatives. The severity of this impact would be greatest under the 1996 General Plan Alternative, followed by the No Project, Roadway Constrained 6-Lane “Plus,” and Environmentally Constrained Alternatives. Impact significance before and after mitigation is shown in the table below.

Impact	Significance Before Mitigation*							
	Alt. #1 (No Project)		Alt. #2 (Roadway Constrained 6-Lane “Plus”)		Alt. #3 (Environmentally Constrained)		Alt. #4 (1996 General Plan)	
	2025	Buildout	2025	Buildout	2025	Buildout	2025	Buildout
5.13-1: Destruction or Alteration of Documented and Undocumented Prehistoric and Historic Sites, Features, Artifacts, and Human Remains	S ₂	S ₂	S ₃	S ₃	S ₄	S ₄	S ₁	S ₁

Mitigation	Significance After Mitigation*							
	Alt. #1 (No Project)		Alt. #2 (Roadway Constrained 6-Lane "Plus")		Alt. #3 (Environmentally Constrained)		Alt. #4 (1996 General Plan)	
	2025	Buildout	2025	Buildout	2025	Buildout	2025	Buildout
5.13-1(a), Implement Mitigation Measure 5.1-3(a); 5.13-1(b), Treat Significant Resources in Accordance with CEQA Standards; 5.13-1(c), Adopt Cultural Resources Ordinance; 5.13-1(d), Define Historic Design Control Districts; 5.13-1(e), Prohibit Alteration or Destruction of NRHP/CRHR listed Properties; 5.13-1(f), Compile and Provide Access to Cultural Resource Data Not Documented in NCIC Files; and 5.13-1(g), Ensure that Proposed Projects Do Not Disturb Human Interments	LS	LS	LS	LS	LS	LS	LS	LS
	Measures 5.13-1(a) through 5.13-2(e) only	Measures 5.13-1(a) through 5.13-2(e) only					Measures 5.13-1(a) through 5.13-1(e) only	Measures 5.13-1(a) through 5.13-1(e) only
* Notes: LS = Less than Significant; N/A= Not Applicable; S = Significant; SU = Significant and Unavoidable. Significant impacts are ranked against each other by alternative for the 2025 scenario and the buildout scenario, from 1 (Worst Impact) to 4 (Least Impact). Where the impact under two different alternatives during the same time frame would be roughly equal in severity, the numerical ranking is the same.								

High- and medium-intensity levels of land use development in El Dorado County are likely to result in adverse impacts on cultural resources (see Table 3-4 in Chapter 3). For the cultural resource analysis, the intensity level is based on expected ground disturbance and human interaction. It is assumed that high-density land uses could occur on lands designated as Adopted Plan (AP), Commercial (C), High-Density Residential (HDR), Medium-Density Residential (MDR), Low-Density Residential (LDR), Multi-Family Residential (MFR), Industrial (I), Research and Development (RD), and Public Facilities (PF). Medium-intensity levels of land use may occur on lands designated as Agricultural (A), Rural Residential (RR), and Tourist Recreation (TR). Remaining lands within the county, including Natural Resources (NR) and Open Space (OS), could be developed only with low-intensity land use.

A consideration of potential land use intensity is critical in any assessment of potential impacts on cultural resources. All other factors being equal, the more widespread and intensive the levels of projected development within the county, the more likely that there could be adverse

impacts on recorded and undocumented prehistoric and historic sites, features, or objects. An additional factor to consider is the review process afforded potential development. The more rigorous and inclusive the review, the greater the potential to avoid or mitigate potential impacts on cultural resources.

NR and OS land uses present, in relative terms, less of a potential threat to cultural resources than appears at first glance. While impacts such as recreational use and park developments can pose very real dangers to significant cultural resources, the intensity of these activities is, in general, minimal. As such, the number of acres subject to low-intensity use, while certainly warranting consideration in an assessment of impacts on cultural resources, is not necessarily the figure of greatest concern. It is the occurrence of loss of culturally sensitive acres as a result of high and medium levels of land use that is of primary interest in relation to all the alternatives. This is because of the fact that these uses would result in greater degrees of soil disturbance and alteration of topography within sensitive areas, potentially altering or destroying documented archaeological and historic materials.

Any level of ground disturbance within the county, regardless of intensity, has the potential to significantly affect cultural resources. As previously noted in this section, prehistoric and historic cultural resources can occur anywhere on the landscape regardless of topography, but areas with various floral, faunal, and mineral resources, areas located near surface water, areas with low degrees of slope occurring in the immediate vicinity of perennial, natural water sources are most likely to contain cultural resources. Although impacts on any lands are a matter of concern regarding prehistoric and historic sites, areas with low slope (<25%) in close proximity to natural water sources are generally more sensitive. The loss of such areas to development projects as a result of any alternative is of particular concern and is quantified in Table 5.13-3.

Ground disturbance and the potential loss of culturally sensitive acreage do not constitute the only major potential threats to the integrity of cultural resources in El Dorado County. Historic buildings and structures can be adversely impacted by modification or demolition. Also, new development next to historic structures and buildings can impact the resource by potentially compromising the resource's historic character. The alteration or destruction of historic buildings and structures and their historic settings, particularly those listed on the CRHR/NRHP or determined eligible for listing, constitutes a potential impact.

Table 5.13-3 Culturally Sensitive Acreage Subject to Development-Related Effects (Buildout)						
Land Use Intensity	No Project ¹ / 1996 General Plan		Roadway Constrained 6-Lane "Plus"		Environmentally Constrained	
	Acres	Percent	Acres	Percent	Acres	Percent
High	7,394	16	5,955	13	5,393	12
Medium	6,474	14	4,875	10	6,370	14
Subtotal	13,868	30	10,830	23	11,762	25
Low	32,841	70	35,758	77	34,826	75
Total	46,709	100	46,588	100	46,588	100
¹ While the No Project and 1996 General Plan alternatives have the same land use designations on the same acreage, the Writ significantly restricts the development potential of the No Project Alternative because of the prohibition on subdivisions. Source: EDAW 2003						

It is important to note that assessments of the possible loss of culturally sensitive acreage in the county do not express the total potential loss of acreage that could contain cultural resources. Table 5.13-3 only expresses and quantifies potential loss of presently undeveloped most-sensitive areas and cannot address the effects of development on "nonsensitive" or less-sensitive lands.

No Project Alternative (Alternative #1)

Relevant Goals and Policies—No Project Alternative

The relevant policies that are applicable to the No Project Alternative are Policies 7.5.1.1 through 7.5.1.5, 7.5.2.1 through 7.5.2.6; Objective 7.5.3: No applicable policies; and Policy 7.5.4.1.

No Project Alternative (2025)—Impact Discussion

Under this alternative at 2025, the Writ would limit further subdivision of parcels except within the areas covered by the existing development agreements (DAs). No further high-density or medium-density residential housing would occur in the county even though higher intensities of land use are reflected on the land use map. Only commercial/industrial development and development of single dwellings on individual existing parcels would be allowed under the conditions of the Writ. Because all residential development would be ministerial in nature, the provisions of CEQA governing cultural resources would not apply.

This alternative would result in dispersed development and development in rural and more remote areas of the county. While such development might appear to be a worst-case scenario in terms of impacts on cultural resources, this is not necessarily the case. Development of single homes on existing lots and the limited subdividing of parcels could allow more flexibility in the actual placement of buildings and structures.

The most significant potential impacts on cultural resources situated within the county under the No Project Alternative at 2025 would be from ministerial development consisting primarily of single-family homes on individual parcels. It has been projected that approximately 21,434 housing units would be constructed by 2025 and that there would be commercial and industrial development to support 36,188 jobs (see Tables 4-5 and 4-6). The majority of this development is projected to occur in the areas covered by the known DAs. The largest number of units are predicted to occur in the El Dorado Hills (13,104 units and 25,255 jobs) and Cameron Park/Shingle Springs/Rescue (3,134 units and 13,861 jobs) market areas.

One problem not addressed by any of the policies for this alternative (or the other equal-weight alternatives) is the degree to which ministerial development would affect cultural resources at 2025. This is particularly relevant to the No Project Alternative because the Writ prohibits new residential subdivisions, except in areas already approved and vested before the Writ. A large percentage of development projected to occur under all scenarios would not be subject to discretionary review because it would occur by right on legal parcels, such as residences constructed on legal parcels with no subdivision of land. If not subjected to effective mitigation measures, ministerial development projects could present a far greater threat to the integrity of cultural resources in the county than discretionary developments.

As outlined below, the policies applied to the No Project Alternative do not constitute effective cultural resource management tools for the County because they do not provide prescriptive measures. These policies include, but are not limited to, the encouragement of Native American participation and advisement on cultural resource studies (Policy 7.5.1.1); basic guidelines for the treatment of cultural resources (Policy 7.5.1.1); use of NRHP- or CRHR-comparable significance criteria in the evaluation of resources (Policy 7.5.1.1); the maintenance of the character or replication of historic structures subject to alteration or demolition (Policy 7.5.2.5); and the creation of Historic Districts (Historic Design Control Districts) (Policy 7.5.2.1). Further, because of the application of the Writ, much of the future development under the No Project Alternative at 2025 is ministerial in nature, and ministerial projects are not typically subject to General Plan policy review. Levels of cultural resource protection afforded by the policies in the No Project Alternative can be categorized according to two levels:

- < Level 1 Policies—those that establish broad-based foundational guidelines for the protection of cultural resources and mitigation for potential development-related impacts, and
- < Level 2 Policies—all subsequent policies whose formulation and implementation are guided or approved by Level 1 policies.

Level 1 policies proposed in the No Project Alternative are Policies 7.5.1.1, 7.5.1.3, and 7.5.1.5. These call for the establishment of a Cultural Resources Preservation Commission, the inclusion of a Cultural Resources section in the Zoning Ordinance, and the requirement of cultural resource studies for all discretionary projects. These policies discuss the need for cooperation with the local Native American community, the possible inclusion of setbacks from documented archaeological and historic sites, the incorporation of cultural studies, and the use of NRHP criteria for determining the significance of cultural resources.

The only Level 1 policy (or element of a Level 1 policy) that could directly mitigate potential development under the No Project Alternative at 2025 is Policy 7.5.1.1. As prehistoric resources are frequently situated near natural water sources, a setback of 100 feet or more from perennial natural water sources (including flowing waters [streams and rivers], standing waters [ponds and lakes], and perennial wetlands) would serve to protect land forms most likely to contain cultural resources. The incorporation of such setbacks from perennial natural water sources could result in the reduction of some impacts to less-than-significant levels.

Level 2 policies are those that would be subject to the guidance of a Cultural Resources Commission acting in an advisory capacity to the County. These policies are, in effect, the most likely to provide significant levels of mitigation for the potential impacts related to ministerial and discretionary development under the No Project Alternative at 2025. These include Policies 7.5.1.2, 7.5.1.4, and 7.5.2.1 through 7.5.2.6. All of these could result in the protection of prehistoric and historic resources in the county. In general, these policies could provide a general outline for the pursuit of funding for specific recording, preservation and management projects for known cultural sites and the establishment of CRHR-equivalent Historic Districts. Consequently, they would constitute effective measures to mitigate development impacts proposed under this alternative and could result in reducing project-related impacts to less-than-significant levels.

Policies 7.5.1.4 and 7.5.4.1 and Objective 7.5.3 (no associated policies) also do not provide mechanisms through which cultural resources could be effectively recorded, protected, or managed. Policy 7.5.4.1 ensures access to and parking near historic cemeteries which does not necessarily serve to protect these resources as “protection” is too vague a term to constitute an

effective preservation mechanism. In addition, this specific policy does not consider undocumented historic or prehistoric cemetery sites. As a result of these and other deficiencies, implementation of these policies (and objective) would not result in reducing the impacts of development.

As currently written, the policies generally would not provide for adequate levels of recordation, preservation, and management of documented prehistoric and historic cultural resources subject to impacts resulting from ministerial or discretionary development projects. Taken as a whole, many elements of the policies tend to mirror CEQA cultural resource provisions, but they do not provide additional specific mechanisms suitable for mitigating impact of ministerial development projected under the No Project Alternative at 2025. This impact is considered significant.

No Project Alternative (Buildout)—Impact Discussion

The most significant potential impacts on cultural resources situated within El Dorado County under this alternative at buildout would result from the potential for the construction of high-intensity commercial developments. As discussed above under No Project Alternative (2025)—Impact Discussion, because of the application of the Writ and its limitation on subdivision, high-intensity residential developments will not occur except in the areas covered by existing DAs.

The most intensive areas of probable development are projected to be in the El Dorado Hills (13,205 units), Cameron Park/Shingle Springs/Rescue (4,326 units), and Georgetown/Garden Valley (2,023 units) Market Areas.

Impacts on culturally sensitive acreage are expected to be greater at buildout than at 2025 (see Table 5.13-3) because of increased development and the dispersal of development to outlying areas within the county. It is expected that all residential development after 2025 would occur on existing legal parcels requiring only ministerial permits. Approximately 8,086 housing units are projected to be built after 2025; these units are expected to be constructed not in dense clusters but across the county landscape, affecting a wide variety of landforms, including those most likely to contain cultural resources. In addition, in the absence of policies, this ministerial development could be conducted in what amounts to a regulatory void where only ministerial standards and not General Plan policies apply. This would present a substantial risk to documented and undocumented cultural resources.

Roadway Constrained 6-Lane “Plus” Alternative (Alternative #2)

Relevant Goals/Policies—Roadway Constrained 6-Lane “Plus” Alternative

The relevant policies included in the 1996 General Plan that are applicable to the Roadway Constrained 6-Lane “Plus” Alternative are Policies CO-8a through CO-8e, CO-9a through CO-9c, and CO-10a and CO-10b.

Roadway Constrained 6-Lane “Plus” Alternative (2025)—Impact Discussion

Under the Roadway Constrained 6-Lane “Plus” Alternative, no high- or medium-intensity residential development would take place in the county. Parcels could be subdivided but, except for those included in approved and vested DAs, only into up to four additional parcels. Subdivisions of four parcels are generally exempt from CEQA (§15315), although not in all instances. More residential development that may not be subject to CEQA would occur in rural and remote areas. Depending on the degree that subdivision occurs in the county, development could be more intensive than under the No Project Alternative, which entails a similarly dispersed development pattern. The potential for residential development on smaller lots not subject to CEQA overview in a dispersed pattern of development in the county poses a significant risk to cultural resources. Unlike the No Project Alternative, under the Roadway Constrained 6-Lane “Plus” Alternative, four-parcel subdivisions with the potential for a unit on each of the created parcels could result in smaller lots with less flexibility for the placement of buildings and structures.

It has been projected that approximately 25,839 housing units would be constructed by 2025 and that there would be commercial and industrial development to support 43,455 jobs (see Tables 4-5 through 4-7). The majority of this development is projected to occur in the El Dorado Hills (14,827 units and 23,789 jobs) and Cameron Park/Shingle Springs/Rescue (3,957 units and 4,085 jobs) Market Areas.

This alternative at 2025 could have a significant impact on culturally sensitive acreage in the county (see Table 5.13-3). Although the differences are comparatively minor, the Roadway Constrained 6-Lane “Plus” Alternative would affect culturally sensitive areas to a lesser degree than the other alternatives discussed in this document. (As noted under the No Project alternative above, high and medium levels of development intensity are limited by the Writ would will not occur.)

The policies for this alternative are intended to provide adequate protection for cultural resources located within the county. The Roadway Constrained 6-Lane “Plus” Alternative

policies are similar to those presented in the 1996 General Plan and discussed above under No Project Alternative (2025)—Impact Discussion. However, several important differences stand out and are discussed below.

As with the No Project Alternative, levels of cultural resource protection afforded by the policies for the Roadway Constrained 6-Lane “Plus” Alternative can be categorized as Level 1 and Level 2 policies. Level 1 policies include Policies CO-8b, CO-8c, and CO-8d. Taken as a whole, these policies are the most effective of the Roadway Constrained 6-Lane “Plus” Alternative policies in that they provide succinct quantitative means for the recordation, protection, and management of cultural resources in the county and form the basis for the formulation and implementation of subsequent policies. These include the adoption of a Cultural Resources Preservation Ordinance (similar to that discussed for the No Project Alternative), onsite monitoring of all project-related ground disturbances, and the development of mitigation measures designed to reduce adverse effects before approval of development projects.

When taken as a whole, Policies CO-8b, CO-8c, and CO-8d would be effective in reducing significant cultural resource impacts stemming from projected developments under the Roadway Constrained 6-Lane “Plus” Alternative. This is especially the case for Policy CO-8b, which would require that an archaeological monitor be present during all ground-disturbing activities on discretionary projects.

Level 2 policies include Policies CO-8a, CO-9a through CO-9c, and CO-10a and CO-10b. Some Level 2 policies, including CO-9a, CO-9b, and CO-9c, could contribute toward the preservation of historic resources through the definition and establishment of CEQA-equivalent Historic Design Control Combining Zone District(s) (CEQA “Historic District[s]”). These policies are, in effect, the same as those policies articulated in the 1996 General Plan and discussed above (please refer to No Project Alternative (2025)—Impact Discussion).

Additional Level 2 policies proposed for the Roadway Constrained 6-Lane “Plus” Alternative include Policies CO-8e and CO-10b. Taken as a whole and as currently written, these policies do not constitute effective means by which to reduce the potential impacts related to projected levels of development under this alternative. Specifically, Policies CO-8e and CO-10b do not incorporate mechanisms that would protect cultural resources or mitigate the effects of all development.

As currently written, the policies would, in general, not provide for adequate levels of recordation, preservation and management of documented prehistoric and historic cultural

resources subject to impacts resulting from ministerial development projects. Taken as a whole, many elements of the policies tend to mirror CEQA cultural resource provisions, but they do not provide additional specific mechanisms suitable for mitigating impacts of ministerial development projected under the Roadway Constrained 6-Lane “Plus” Alternative at 2025. This impact is considered significant.

Roadway Constrained 6-Lane “Plus” Alternative (Buildout)—Impact Discussion

Approximately 41,652 housing units are projected be constructed by buildout, and commercial and industrial development to support 117,122 jobs is expected (see Tables 4-5 through 4-7). The majority of this development is projected to occur in the El Dorado Hills (15,018 units and 35,847 jobs) and Cameron Park/Shingle Springs/Rescue (6,059 units and 20,423 jobs) Market Areas, but it would also be dispersed throughout the county.

Impacts on culturally sensitive acreage are expected to be greater at buildout than at 2025 (see Table 5.13-3) because of increased development. Such levels of development, within and outside prime culturally sensitive acreage, would constitute a significant impact on documented and unrecorded cultural resources.

Environmentally Constrained Alternative (Alternative #3)

Relevant Goals/Policies—Environmentally Constrained Alternative

For the relevant policies of the Environmentally Constrained Alternative, please refer to the policies listed above under Relevant Goals/Policies—Roadway Constrained 6-Lane “Plus” Alternative.

Environmentally Constrained Alternative (2025)—Impact Discussion

For an assessment of policies applicable to this alternative, please refer to the Level 1 and Level 2 policy discussion under Roadway Constrained 6-Lane “Plus” Alternative (2025)—Impact Discussion above. It has been projected that 32,290 housing units would be constructed by 2025, and that there would be commercial and industrial development to support 42,711 jobs (see Tables 4-5 through 4-7). The majority of this development is projected to occur in the El Dorado Hills (16,737 units and 26,851 jobs), Cameron Park/Shingle Springs/Rescue (5,996 units and 6,211 jobs), and Diamond Springs (2,326 units and 3,043 jobs) Market Areas. Other portions of El Dorado County would also be affected by increased high-intensity land use. Culturally sensitive acres would be subject to the same types of potential impacts as noted previously (see Table 5.13-3).

Under the Environmentally Constrained Alternative, high- and low-density residential development would be focused in presently existing centers, discouraging dispersed development and maintaining rural centers. Under this scenario, development would occur primarily in these defined areas, allowing for a certain degree of control in terms of placement of development in relation to the locations of documented cultural resources and areas most likely to contain undocumented cultural resources.

Under this alternative, agricultural and environmental resources would receive the most stringent protections. By default, the protection of some natural resources, particularly those within and surrounding perennial natural water sources, would result in greater levels of protection for undocumented prehistoric cultural resources and associated human remains in particular. As discussed previously in this section, prehistoric sites and remains tend to cluster around perennial water, and they would, by association, receive greater protection under this alternative. This protection of environmentally and, by potential association, culturally sensitive areas, in combination with focused residential development subject to the provisions of CEQA, would result in the least impacts on cultural resources of all four equal-weight alternatives. However, this impact is still considered significant.

Environmentally Constrained Alternative (Buildout)—Impact Discussion

The projected population increase of 137,688 residents under this alternative at buildout is expected to lead to the construction of approximately 55,078 housing units (see Tables 4-5 and 4-6). While the majority of this development is projected to occur in the El Dorado Hills (18,786 units), Cameron Park/Shingle Springs/Rescue (11,827 units), and Diamond Springs (5,476 units) Market Areas, other portions of El Dorado County would also be affected by extensive increased high-intensity land use. Culturally sensitive acres would be subject to the same types of potential impacts noted previously except that at buildout, these impacts would be greater because of increased development (see Table 5.13-4). This impact is considered significant.

1996 General Plan Alternative (Alternative #4)

Relevant Goals/Policies—1996 General Plan Alternative

For the relevant policies of the 1996 General Plan Alternative, please refer to the policies listed above under Relevant Goals/Policies—No Project Alternative.

1996 General Plan Alternative (2025)—Impact Discussion

For an assessment of policies applicable to this alternative, please refer to the Level 1 and Level 2 policy discussion in the No Project Alternative (2025)—Impact Discussion. Approximately 32,491 housing units would be constructed by 2025, and there would be commercial and industrial development to support 42,196 jobs (see Tables 4-5 through 4-7). While the majority of this development is projected to occur in the El Dorado Hills (16,263 units and 26,093 jobs), Cameron Park/Shingle Springs/Rescue (5,776 units; 5,979 jobs), and Diamond Springs (3,206 units and 4,203 jobs) Market Areas, other portions of El Dorado County would also be affected by increased high-intensity land use. Culturally sensitive acres would be subject to the same types of potential impacts as noted previously (see Table 5.13-3). Such levels of development, within and outside prime culturally sensitive acreage, would constitute a significant impact on documented and unrecorded cultural resources.

Subdivision could occur under this alternative and development would occur not only in existing centers but in rural areas as well; this would blur the physical distinction between more remote rural areas and heavily developed residential centers. Because of the nature of subdivision-based residential development, smaller lot sizes would prevail throughout the county. Smaller lots, as opposed to larger parcels, limit the degree to which the locations of proposed buildings and structures could be flexible. Consequently, as the options for the placement of buildings and structures within parcels are limited, so are the available options for avoidance of cultural resources or culturally sensitive areas. In addition, the 1996 General Plan Alternative contains fewer protections for sensitive resources (including cultural) and a less-developed regulatory framework for impact avoidance than any of the other equal-weight alternatives. As a result of the levels of residential subdivision and less-stringent impact avoidance mechanisms inherent in this alternative, it would have the greatest impact on cultural resources of the four equal-weight alternatives. This impact is considered significant.

1996 General Plan Alternative (Buildout)—Impact Discussion

Approximately 78,692 housing units are projected to be constructed under buildout and commercial and industrial development is expected to support 86,688 jobs (see Tables 4-5 through 4-7). While the majority of this development is projected to occur in the El Dorado Hills (20,523 units and 35,847 jobs), Cameron Park/Shingle Springs/Rescue (15,629 units and 20,423 jobs), and Diamond Springs (11,904 units and 7,016 jobs) Market Areas, development would be dispersed throughout the County. This impact is considered significant.

Mitigation Measure 5.13-1—No Project Alternative

The County shall implement all of the following measures:

- < Mitigation Measure 5.13-1(a): Implement Mitigation Measure 5.1-3(a)
- < Mitigation Measure 5.13-1(b): Treat Significant Resources in Ministerial Development in Accordance with CEQA Standards
- < Mitigation Measure 5.13-1(c): Adopt a Cultural Resources Ordinance
- < Mitigation Measure 5.13-1(d): Define Historic Design Control Districts
- < Mitigation Measure 5.13-1(e): Prohibit Significant Alteration or Destruction of NRHP/CRHR Listed Properties

These potential mitigation measures are described below. With implementation of these mitigation measures, impacts would be reduced to a less-than-significant level.

Mitigation Measure 5.13-1(a): Implement Mitigation Measure 5.1-3(a)

The County shall implement Mitigation Measure 5.1-3(a) described in Section 5.1, Land Use and Housing. This measure provides for a review process for all development projects in El Dorado County to determine whether they conform to General Plan and other County policies regarding natural and cultural resources.

This mitigation measure would contribute to reducing impacts on undocumented and documented cultural resources to a less-than-significant level. The review process would serve to identify the presence of undocumented cultural resources and corroborate data on documented cultural resources.

Mitigation Measure 5.13-1(b): Treat Significant Resources in Ministerial Development in Accordance with CEQA Standards

The County shall implement the following new policy:

New Policy: The County shall treat any significant cultural resources (i.e., those determined CRHR/NRHP eligible), documented as a result of a conformity review for ministerial development, in accordance with CEQA standards.

This mitigation measure would contribute to reducing impacts on undocumented and documented cultural resources to a less-than-significant level. A determination of resource significance as per NRHP/CRHR standards and treatment of significant resources in accordance with CEQA standards would mitigate development effects on important sites, features, and artifacts.

Mitigation Measure 5.13-1(c): Adopt a Cultural Resources Ordinance

The County shall replace Policy 7.5.1.1 with the following:

New Policy 7.5.1.1: The County shall establish a Cultural Resources Ordinance. This ordinance shall provide a broad regulatory framework for the mitigation of impacts on cultural resources by discretionary projects. This Ordinance should include (but not be limited to) and provide for the following:

- < Appropriate (as per guidance from the Native American Heritage Commission) Native American monitors to be notified regarding projects involving significant ground-disturbing activities that could affect significant resources
- < A 100-foot development setback in sensitive areas as a study threshold when deemed appropriate.
- < Identification of appropriate buffers, given the nature of the resources within which ground-disturbing activities should be limited.
- < A definition of cultural resources that are significant to the County. This definition shall conform to (but not necessarily be limited to) the significance criteria used for the NRHP and the CRHR.
- < Formulation of project review guidelines for all development projects.
- < Development of a cultural resources sensitivity map of the County.

This mitigation measure would contribute to reducing impacts on undocumented and documented cultural resources to a less-than-significant level. These provisions would serve to protect undocumented prehistoric resources in particular, which tend to exist in the vicinity of water sources covered under the setback considerations; to provide suitable buffers around documented resources; and to provide an opportunity for the Native American community to comment on potential impacts of development on important cultural sites.

Mitigation Measure 5.13-1(d): Define Historic Design Control Districts

The County shall replace Policy 7.5.2.2 with the following:

New Policy 7.5.2.2: The County shall define Historic Design Control Districts (HDCDs). HDCD inclusions and boundaries shall be determined in a manner consistent with NHPA Historic District standards.

- A. The County shall develop design guidelines for each HDCD. These guidelines shall be compatible with NHPA standards.
- B. New buildings and structures and reconstruction/restoration of historic (historic as per NRHP and CRHR criteria) buildings and structures shall generally conform to styles of architecture and construction prevalent during the latter half of the 19th century into the first decade of the 20th century.
- C. Any historic building or structure located within a designated HDCD, or any building or structure located elsewhere in the county that is listed on the NRHP or CRHR, is designated a California Building of Historic Interest, or a California State Historic Landmark, or is designated as significant as per NRHP/CRHR criteria, shall not be destroyed, significantly altered, removed, or otherwise changed in exterior appearance without a design review.
- D. In cases where the County permits the significant alteration of a historic building or structure exterior, such alteration shall be required to maintain the historic integrity and appearance of the building or structure and shall be subject to a design review.
- E. In cases where new building construction is placed next to a historic building or structure in a designated HDCD or listed on the CRHR/NRHP, the architectural design of the new construction shall generally conform to the historic period of significance of the HDCD or listed property.
- F. In cases where the County permits the destruction of a historic building or tearing down structure, the building or structure shall first be recorded in a manner consistent with the standards of the NHPA Historic American Building Survey (HABS) by a qualified professional architectural historian.

- G. The County shall mandate building and structure design controls within the viewshed of the Marshall Gold Discovery State Historic Park. These design controls shall be consistent with those mandated for designated Historic Design Control Districts.

This mitigation measure would contribute to reducing impacts on documented historic buildings and structures to a less-than-significant level. By providing clear standards for the treatment of historic buildings and structures within HDCDs, the historic character, integrity, and significance of these historic resources can be maintained.

Mitigation Measure 5.13-1(e): Prohibit Significant Alteration or Destruction of NRHP/CRHR Listed Properties

The County shall replace Policy 7.5.2.4 with the following:

New Policy 7.5.2.4: The County shall prohibit the modification of all NRHP/CRHR listed properties that would alter their integrity, historic setting, and appearance to a degree that would preclude their continued listing on these registers. If avoidance of such modifications on privately owned listed properties is deemed infeasible, mitigation measures commensurate with NRHP/CRHR standards shall be formulated in cooperation with the property owner.

This mitigation measure would contribute to reducing impacts on documented significant cultural resources to a less-than-significant level. By prohibiting levels of modification of NRHP/CRHR listed properties that would result in their no longer being eligible for listing and/or providing mitigation for such modifications, this new policy would provide strong protections for the most significant cultural resources located in the county.

Mitigation Measure 5.13-1—Roadway Constrained 6-Lane “Plus” Alternative

The County shall implement all of the following measures:

- < Mitigation Measure 5.13-1(a): Implement Mitigation Measure 5.1-3(a)
- < Mitigation Measure 5.13-1(b): Treat Significant Resources in Ministerial Development in Accordance with CEQA Standards
- < Mitigation Measure 5.13-1(c): Adopt a Cultural Resources Ordinance
- < Mitigation Measure 5.13-1(d): Define Historic Control Districts

- < Mitigation Measure 5.13-1(e): Prohibit Significant Alteration or Destruction of NRHP/CRHR Listed Properties
- < Mitigation Measure 5.13-1(f): Compile and Provide Access to Cultural Resources Data Not Documented in NCIC Files
- < Mitigation Measure 5.13-1(g): Ensure that Proposed Projects Do Not Disturb Human Interments

These potential mitigation measures are described below. With implementation of these mitigation measures, impacts would be reduced to a less-than-significant level because cultural resources would receive adequate protection.

Mitigation Measure 5.13-1(a): Implement Mitigation Measure 5.1-3(a)

Please refer to the proposed mitigation measure for the No Project Alternative above.

Mitigation Measure 5.13-1(b): Treat Significant Resources in Ministerial Development in Accordance with CEQA Standards

Please refer to the proposed mitigation measure for the No Project Alternative above.

Mitigation Measure 5.13-1(c): Adopt a Cultural Resources Ordinance

The County shall revise Policy CO-8a as follows:

Revised Policy CO-8a: The County shall adopt a Cultural Resources Preservation Ordinance to address the inventory, preservation, protection, and management of prehistoric and historic resources and to establish procedures for the review of and comment on projects that may affect cultural resources. This Ordinance should include (but not be limited to) and provide for the following:

- < Appropriate (as per guidance from the Native American Heritage Commission) Native American monitors to be notified regarding projects involving significant ground-disturbing activities that would affect significant resources.
- < A 100-foot development setback in sensitive areas as a study threshold when deemed appropriate.
- < Identification of appropriate buffers, given the nature of the resources within which ground-disturbing activities should be limited.

- < A definition of cultural resources that are significant to the County. This definition shall conform to (but not necessarily be limited to) the significance criteria used for the NRHP and the CRHR.
- < Formulation of project review guidelines for all development projects.
- < Development of a cultural resources sensitivity map of the county.

Mitigation Measure 5.13-1(d): Define Historic Control Districts

The County shall replace Policy CO-9a with the following:

New Policy CO-9a: The County shall create Historic Design Control Combining Zone Districts for areas, places, sites, structures, or uses that have special historic significance. The Zoning Ordinance shall be amended to include such districts and design guidelines for reconstruction and construction of new buildings in such districts. Historic Design Control Combining Zone District inclusions and boundaries shall be determined in a manner consistent with NHPA Historic District standards.

The County shall revise Policies CO-9b and CO-9c as follows:

Revised Policy CO-9b: The demolition, alteration, removal, expansion, improvement, or exterior alteration of any historically significant buildings or structures shall be subject to design review by the ~~County~~ Cultural Resources Preservation Commission.

Revised Policy CO-9c: In cases where the County permits the alteration or demolition of a historic building, such alteration or new construction (subsequent to demolition) shall be done in a manner that maintains the historic character of the building (in the case of alteration) or replicates its historic features (in the case of demolition) ~~in conformance with Secretary of the Interior standards.~~ The alteration or new construction shall be subject to a design review. If demolition of a historic building is permitted, the building shall first be recorded and photographed pursuant to the Historic American Building Survey (HABS) guidelines by an architectural historian approved by the County.

Mitigation Measure 5.13-1(e): Prohibit Significant Alteration or Destruction of NRHP/CRHR Listed Properties

Please refer to the proposed mitigation measure for the No Project Alternative above.

Mitigation Measure 5.13-1(f): Compile and Provide Access to Cultural Resources Data Not Documented in NCIC Files

The County shall revise Policy CO-8c as follows:

Revised Policy CO-8c: The County shall work cooperatively with the appropriate organizations, professionals, and Native Americans to compile relevant information on the location and the significance of cultural resources not documented in the files of the NCIC. This information shall be used to supplement data provided by the NCIC for the development review process outlined in Mitigation Measure 5.13-1(a).

The County shall replace Policy CO-8e with the following:

New Policy CO-8e: The County shall support public and private efforts to record historic districts, sites, buildings, and objects in the National Register of Historic Places and inclusion in the California State Office of Historic Preservation's California Points of Historic Interest and California Register of Historic Resources by providing access for qualified individuals or organizations to cultural resources data compiled as a result of Revised Policy CO-8C.

Mitigation Measure 5.13-1(g): Ensure that Proposed Projects Do Not Disturb Human Interments

The County shall replace Policy CO-10b as follows:

New Policy CO-10b: All projects located adjacent to cemeteries (including historic cemeteries and Native American funerary sites) shall be evaluated to ensure that the proposed projects do not disturb human interments, affect the historic setting of cemeteries, or interfere with access to public cemeteries.

Mitigation Measure 5.13-1—Environmentally Constrained Alternative

Please refer to the proposed mitigation measures for the Roadway Constrained 6-Lane "Plus" Alternative above. With implementation of these mitigation measures, impacts would be reduced to a less-than-significant level.

Mitigation Measure 5.13-1—1996 General Plan Alternative

Please refer to the proposed mitigation measures for the No Project Alternative above. With implementation of these mitigation measures, impacts would be reduced to a less-than-significant level.