

## 4.4 CULTURAL AND PALEONTOLOGICAL RESOURCES

This section describes the existing cultural and paleontological resources on the site for the proposed Belmont Pool Revitalization Project (proposed Project), the potential impact of the proposed Project on those resources, and measures to avoid, lessen, and/or mitigate those impacts. The information and analyses provided in this section are summarized from the following technical documents:

- *Cultural Resources Memorandum* (LSA Associates, Inc. [LSA], May 15, 2013)
- *Paleontological Assessment for the Belmont Pool Revitalization Project, 4000 East Olympic Plaza, City of Long Beach, California* (LSA, June 6, 2014)

These technical documents contain information regarding the historic setting and cultural setting of the region, including prehistory, ethnohistory, and historical overviews. Copies of these technical reports are provided in Appendix D in this Draft Environmental Impact Report (EIR).

### Scoping Process

The City of Long Beach (City) distributed the first Notice of Preparation (NOP) for the Draft EIR from April 18 to May 17, 2013. The City received three comment letters in response to the original NOP. No comment letter associated with Cultural or Paleontological Resources was received in response to the original NOP circulated for the proposed Project. Due to the revisions in the Project Description, the City re-issued and circulated the NOP for the Draft EIR from April 9, 2014, to May 8, 2014. The City received five comment letters in response to the re-issued NOP during the public review period. One comment letter raised issues regarding Cultural Resources. The Native American Heritage Commission letter (NAHC, April 15, 2014) recommended several actions regarding the proposed Project. Those actions and how they were addressed are summarized in Table 4.4.A.

### 4.4.1 Methodology

**Paleontological Resources.** A paleontological literature search and locality review was conducted to obtain geological and paleontological locality information pertinent to the proposed Project and the area immediately surrounding the Project site. This included geologic maps, paleontological literature, and the geotechnical reports that were prepared for the Project. In addition, information from the Natural History Museum of Los Angeles County (LACM) was requested.

The objective of this archival research was to determine the geology of the Project site and whether there were any known paleontological localities within or immediately adjacent to the Project site. Even if there were no known localities nearby, the results could be used to determine whether there were any geologic formations in the Project area with the potential to contain paleontological resources based on localities from similar sediments.

**Table 4.4.A: Summary of Recommendations from the Native American Heritage Commission**

Recommendation	How Recommendation was Addressed
Contact the appropriate Information Center for a records search.	A records search was completed on April 4, 2013, at the South Central Coastal Information Center of the California Historical Resources Information System at California State University, Fullerton.
Prepare a professional report detailing the findings and recommendations of the records search and field survey.	Refer to the <i>Cultural Resources Memorandum</i> dated May 15, 2013.
Contact the list of Native American contacts provided with the NAHC letter.	Native American consultation is not warranted because the proposed Project is not subject to the requirements of Senate Bill 18, is not considered to be archaeologically sensitive.
Include mitigation for: <ol style="list-style-type: none"> <li>1. The identification and evaluation of accidentally discovered archeological resources;</li> <li>2. Monitoring in areas of identified archeological sensitivity;</li> <li>3. Provisions for the disposition of recovered artifacts; and</li> <li>4. Provisions in the event of the discovery of human remains.</li> </ol>	<ol style="list-style-type: none"> <li>1. Due to the previous grading that has occurred on the Project site, the lack of evidence of prehistoric use of the site as noted during a site survey in April 2013, and the fact that no prehistoric sites have been recorded within 0.25 mile of the site, no mitigation is required.</li> <li>2. Based on the results of the records review and literature search and evaluation conducted for the Project, the potential for on-site archeological resources is minimal and no monitoring is recommended for this Project.</li> <li>3. See Response No. 2.</li> <li>4. In the unlikely event that human remains are encountered during demolition of the existing structures and features and grading/excavation for the Project, the proper authorities would be notified, and standard procedures for the respectful handling of the human remains activities would be adhered to in compliance with State Health and Safety Code Section 7050.5 and PRC Section 5097.98.</li> </ol>

NAHC = Native American Heritage Commission  
 PRC = Public Resources Code

**Archeological Resources.** A records search was completed on April 4, 2013, at the South Central Coastal Information Center (SCCIC) of the California Historical Resources Information System at California State University, Fullerton. The record search identified no recorded cultural resources on the Project site, or within 0.25 mile of the Project site. Two cultural resource surveys have been previously completed that include the Project site. In addition, Directory of Properties of the Historic Property Data (HPD) File for Los Angeles County and a copy of the historic *Long Beach, California* 7.5-minute quadrangle map (USGS 1925) and aerial photographs were reviewed. Two cultural resource surveys were also completed that include the Project area. Because the Project site is fully

developed with structures, parking, landscaping, roadway, and other features, no on-site survey for archeological resources was conducted.

**Historic Resources.** Potential historic resources in the City are evaluated under one or more of three established sets of criteria of significance, corresponding to federal, State, and local designation programs. To be eligible for inclusion in the National Register of Historic Places (National Register), the California Register of Historical Resources (California Register), or for listing as a landmark or landmark district of the City, a property must satisfy one or more of the appropriate registration criteria. Due to its age, the former Belmont Pool was not considered a historic structure, and no further historic resource evaluation is warranted.

#### 4.4.2 Existing Environmental Setting

**Paleontological Resources.** The Project area is located at the northern end of the Peninsular Range Geomorphic Province, a 900-mile northwest-southeast trending structural block that extends from the tip of Baja California to the Transverse Ranges and includes the Los Angeles (LA) Basin. Specifically, the Project is located within the LA Basin. The LA Basin is a broad, almost level alluvial plain with a gradient of 0.5 to 1 percent. It is bounded on the north and northeast by hills and mountains of the Northern Peninsular and Transverse Ranges and on the south and west by the Pacific Ocean. The LA Basin is divided into several areas. The Downey Plain, in which the Project site lies, is the largest section and is located in the central portion of the LA Basin.

According to the results of the locality search conducted through the LACM the surficial deposits within the Project are composed of active beach sands. These types of sediments typically do not contain significant vertebrate fossils at least in the uppermost layers; however, the LACM states that these deposits often overlie sediments that can contain paleontological resources. The closest locality to the Project that is within similar sediments and that may be encountered at depth within the Project is LACM 2031, near the intersection of Grand Avenue and East Livingston Drive (800 feet [ft] to the northwest), which produced a specimen of a Bison (*Bison* sp.) at a depth of approximately 25 ft. The next closest locality is LACM 7739, located between the parking lot of Bluff Park and the shoreline (1.1 mile to the west), which produced a rich suite of fossil marine vertebrates, including sharks, rays, and bony fish (see full list in Appendix D), as well as associated fossil invertebrates (including snails, clams, tusk shells, barnacles, crabs, and sea urchins) at a depth of approximately 25 ft below the surface. Just to the west of locality LACM 7739, located across from Bixby Park south of Ocean Boulevard at approximately 17<sup>th</sup> Place (1.3 miles to the west), LACM 1005 produced fossil specimens of mammoth (*Mammuthus columbi*) and ground sloth (*Nothrotheriops shastensis*) at approximately 60 ft below the surface. Finally, LACM 6896, located along Ocean Boulevard near its intersection with Magnolia Avenue (approximately 3 miles to the west), produced a whale humerus at a depth of less than 100 ft during pile-driving activities.

Artificial Fill has been mapped as occurring on the surface of the Project site. Artificial Fill is also noted as being present on the surface of the Project site in the geotechnical report and may extend 4 to 5 ft below the surface. The geotechnical report also states that beneath the Artificial Fill are deposits of alluvium and of beach and estuary-type sediments that extend to the deepest borings that reached 75 ft below the surface. Record searches also indicate that Late Pleistocene to Holocene Alluvium

and Late Holocene deposits of beach and estuarine sediments are located nearby. Each unit is described in more detail below.

**Artificial Fill.** Artificial Fill consists of sediments that have been removed from one location and transported to another by humans. The transportation distance can range from a few feet to dozens of miles. Composition is dependent on the source. When Artificial Fill is compacted and dense, it is known as “engineered fill,” but it can be unconsolidated and loosely compacted. Artificial Fill will sometimes contain modern debris such as asphalt, wood, bricks, concrete, metal, glass, plastic, and even plant material. Depending on the area, thickness can be less than 1 ft or several hundred feet. Within the subsurface of the Project, the geotechnical studies indicate that the thickness of the Artificial Fill ranges between 1.5 and 3.5 ft thick.

**Very Young Beach Deposits.** These deposits are unconsolidated and consist mostly of well-sorted fine- to coarse-grained sand and sand-sized fragments of fragmented shells within areas subjected to active wave action. These sediments were deposited during the late Holocene. These sediments are likely less than several 1,000 years old given the fact that sea levels have been relatively stable over the last 7,000 years and that prior to this time (18,000 to 7,000 years ago) sea levels had been mostly rising due to melting glaciers. The active beach was well off shore and approximately 400 ft below the current sea level 18,000 years ago. These sediments can be several feet to possibly tens of feet thick, and in the active beach zone, this thickness can vary with the seasonal movement of the sand both on- and off-shore. Within the Project site, the geotechnical studies indicate these sediments may range in thickness between 8 and 13 ft below the Artificial Fill.

**Very Young Estuarine Deposits.** These deposits are composed mostly of loose to moderately dense fine-grained sand, silt, and clay. These sediments were deposited in an estuary-type environment. Like the Very Young Beach Deposits, these sediments are likely less than several thousand years old for the same reason given above. Within the Project area, these sediments are 4 to 15 ft thick and both underlie and interfinger with the Very Young Beach Deposits.

**Young Alluvial Floodplain Deposits.** Young Alluvial Floodplain Deposits were deposited during the Holocene to the late Pleistocene. These sediments are less than 126,000 years old; however, it is likely that the upper approximately 15 ft of these deposits are from the Holocene and are less than 11,700 years old. These deposits are composed of mixtures of gravel, sand, silt, or mud that were deposited by flowing water in a stream or river.

Within the Project site, these Pleistocene sediments will likely not be encountered until a depth of at least 23 ft below the surface is reached. This minimum depth is based on minimums of 1 to 2 ft of Artificial Fill, 8 ft of Very Young Beach Deposits, 4 ft of Very Young Estuarine Deposits, and 10 ft of Holocene Alluvium.

### 4.4.3 Regulatory Setting

#### State Regulations and Policies.

**CEQA Requirements.** The California Environmental Quality Act (CEQA) defines a “historical resource” as a resource that meets one or more of the following criteria: (1) listed in, or determined eligible for listing in, the California Register; (2) listed in a local register of historical resources as defined in Public Resources Code (PRC) Section 5020.1(k); (3) identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); or (4) determined to be a historical resource by a project’s Lead Agency (PRC Section 21084.1 and *State CEQA Guidelines* Section 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 on the California Register of Historical Resources” *State CEQA Guidelines* Section 15064.5(a)(3).

In accordance with *State CEQA Guidelines* Section 15064.5(b), a substantial adverse change in the significance of a historical resource may have a significant effect on the environment.

CEQA also requires that a determination be made as to whether a project would directly or indirectly destroy a unique paleontological resource or site or unique geological feature (*State CEQA Guidelines* Appendix G (v)(c)). If an impact is significant, CEQA requires feasible measures to minimize the impact (*State CEQA Guidelines* Section 15126.4 [a][1]). California PRC Section 5097.5 also applies to paleontological resources (see below).

**Public Resources Code Section 5097.5.** PRC Section 5097.5 provides for the protection of cultural and paleontological resources and prohibits the removal, destruction, injury, or defacement of archaeological and paleontological features on any lands under the jurisdiction of State or local authorities.

### 4.4.4 Impact Significance Criteria

The thresholds for impacts on cultural and paleontological resources used in this analysis are consistent with the Environmental Checklist in Appendix G of the *State CEQA Guidelines*. The proposed Project may be deemed to have a significant impact with respect to cultural or paleontological sources resources if it:

**Threshold 4.4.1:** Causes a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 in the State CEQA Guidelines;

**Threshold 4.4.2:** Causes a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 in the State CEQA Guidelines;

**Threshold 4.4.3: Directly or indirectly destroys a unique paleontological resource or site or unique geologic feature; or**

**Threshold 4.4.4: Disturbs any human remains, including those interred outside of formal cemeteries.**

The Initial Study (IS)/NOP prepared for the proposed Project identified potential impacts related to the possibility for the proposed Project to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. In addition, this Draft EIR addresses whether development of the proposed Project would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

The IS/NOP additionally recognized that potential historic resources in the City are evaluated under one or more of three established sets of criteria of significance, corresponding to federal, State, and local designation programs. To be eligible for inclusion in the National Register or the California Register or for listing as a landmark or landmark district of the City, a property must satisfy one or more of the appropriate registration criteria. In addition, the property must retain sufficient integrity to convey the reasons for its significance. The IS/NOP stated that the City determined that, due to the age of the former Belmont Pool structures and facilities at the time of the NOP (approximately 45 years old), the complex was not considered a historic structure, and no further historic resource evaluation was required.

In addition, the former indoor pool was closed to the public on January 13, 2013, as a result of substandard seismic and structural conditions, and was demolished in February 2015, as it was determined to be an imminent threat to public safety. The demolition of the structure was conducted under an emergency permit. As a result, the Project will not cause a substantial change in the significance of a historical resource as defined in Section 15064.5. Therefore, this topic will not be analyzed further in this EIR.

As a part of the IS/NOP, an archaeological and historical records review and literature search was conducted on April 4, 2013, through the SCCIC of the California Historical Resources Information System at California State University, Fullerton. The results of the records search indicate that there are no sites within 0.25 mile of the Project area. Two cultural resource surveys have been previously completed that include the entire Project area. Because the Project site at the time of the NOP was fully developed with structures, parking, landscaping, roadway, and other features, no on-site survey for archeological resources was necessary. Based on the results of the records review and literature search and evaluation conducted for the Project, the potential for on-site archeological resources is minimal and it was determined that archaeological resources will not be analyzed further in this EIR.

Additionally, the IS/NOP stated that based on the results of records searches performed for the site, there are no known human remains interred on the Project site. In the unlikely event that human remains are encountered during demolition of the existing structures and features and grading/excavation for the Project, the proper authorities would be notified, and standard procedures for the respectful handling of the human remains activities would be adhered to in compliance with State Health and Safety Code Section 7050.5 and PRC Section 5097.98. As a result, the Project would not disturb human remains, and this topic will not be analyzed further in this EIR.

**CEQA Baseline.** At the time the NOP was published (April 2014), the Project site contained both the Belmont Pool facilities and the outdoor temporary pool (opened in December 2013 to provide swimming facilities while the permanent facility was under construction). Although the site contained the former Belmont Pool building at the time of the NOP, the facility was subsequently demolished in February 2015 to alleviate an imminent public safety threat due to the seismically unsafe condition of the building. Therefore, the former Belmont Pool building is not included as a part of the baseline existing conditions.

Assessing cultural resource impacts without the former pool building is appropriate because prior to demolition, the City had determined that, due to the age of the former Belmont Pool structures and facilities at the time of the NOP (approximately 45 years old), the complex was not considered a historic structure, and no further historic resource evaluation was required. The building has subsequently been removed due to its public safety threat, and the adjacent hardscaping (sidewalks and walkways) has also been removed. Based on the archaeological and historical records review and literature search, no known archaeological resources are located on the site or within 0.25 mile of the Project area. Therefore, substantial evidence supports the determination that a baseline condition without the former structure is appropriate because it is based on assessments, records review, and a literature search that found no record of known historic or cultural resources on the site.

#### 4.4.5 Project Impacts

**Threshold 4.4.3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

**Less than Significant Impact with Mitigation Incorporated.** All vertebrate fossils that can be related to a stratigraphic context are significant and are considered significant nonrenewable paleontological resources. Invertebrate and plant fossils, as well as other environmental indicators associated with vertebrate fossils, are considered significant. Certain invertebrate and plant fossils that are regionally rare or uncommon, or help to define stratigraphy, age, environmental conditions, or taxonomic relationships, are considered significant.

A formation or rock unit has paleontological sensitivity, or the potential for significant paleontological resources, if it previously has produced, or has lithologies conducive to, the preservation of vertebrate fossils and associated or regionally uncommon invertebrate and plant fossils. All sedimentary rocks, certain extrusive volcanic rocks, and mildly metamorphosed rocks are considered to have potential for paleontological resources.

As discussed above, the results of the locality search and field survey conducted during preparation of this report indicate that Artificial Fill, Very Young Beach Deposits, Very Young Estuarine Deposits, and Young Alluvial Floodplain Deposits have the potential for being encountered within the Project site. Below is a summary of each of the sediments' potential for paleontological significance.

**Artificial Fill.** Artificial Fill can contain fossils, but these fossils have been removed from their original location and are thus out of context. They are not considered to be important for scientific study and, therefore, are not significant.

**Very Young Beach Deposits.** Although Very Young Beach Deposits can contain remains of animals such as shells, shell fragments, and occasional bones, based on their young age, not enough time has passed for the remains to become fossilized; in addition, the remains are contemporaneous with modern species and are usually not considered to be significant.

**Very Young Estuarine Deposits.** Very Young Estuarine Deposits can contain remains of animals such as shells, shell fragments, and occasional bones. However, based on their young age, not enough time has passed for the remains to become fossilized. In addition, the remains are contemporaneous with modern species and are usually not considered to be significant.

**Young Alluvial Floodplain Deposits.** The upper 10 ft of thickness of these sediments is likely from the Holocene and is less than 11,700 years old. Once a depth of 10 to 15 ft of thickness for these sediments is reached (potentially as shallow as 23 ft below the ground surface), it is possible that alluvial sediments from the Pleistocene will be encountered, and these older sediments can and do contain fossils. Mammoths are the indicator fossil for the Pleistocene Epoch, which is divided into the older Irvingtonian North American Land Mammal Age (NALMA), which spans the period between 2.58 million and 240,000 years ago, and the Rancholabrean NALMA, which spans the last 240,000 years of the Pleistocene. Within the Project area, these sediments will be from the Rancholabrean NALMA. The indicator fossil for the Rancholabrean NALMA is *Bison* sp. Other fossils that may be present include camels, antelopes, saber-toothed cats, dire-wolves, bears, deer, sloths, rodents, birds, reptiles, and fish. There is potential for these types of fossils whenever Pleistocene alluvial sediments are exposed. Pleistocene fossils are scientifically significant, as they add to an understanding of the climatic and habitat conditions as well as the diversity of life during Pleistocene times in Southern California. Therefore, there is a potential for significant fossil remains to be encountered during grading activities at depths of 23 ft or greater. Mitigation Measure 4.4.1 requires a qualified paleontologist to be retained to monitor grading activities. Any collected specimens would be prepared, identified, cataloged, and donated to an accredited repository. Implementation of Mitigation Measure 4.4.1 would ensure that impacts to paleontological resources are reduced to below a less than significant level.

#### 4.4.6 Cumulative Impacts

**Less than Significant Impact with Mitigation Incorporated.** As defined in the *State CEQA Guidelines*, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area for cultural and paleontological resources. The cumulative study area for cultural and paleontological resources is the geographical area of the City of Long Beach, which is the geographical area covered by the City's General Plan, including all goals and policies therein. Future development in the City could include excavation and grading that could potentially impact archaeological and paleontological resources and human remains. The cumulative effect of the proposed Project would be the continued loss of these resources. The proposed Project, in conjunction with other development in the City, has the potential to cumulatively impact archaeological and paleontological resources; however, it should be noted that each development proposal received by the City undergoes environmental review pursuant to CEQA. If there is a potential for significant

impacts to archaeological or paleontological resources, an investigation would be required to determine the nature and extent of the resources and to identify appropriate mitigation measures. If subsurface cultural resources are assessed and/or protected as they are discovered, impacts to these resources would be less than significant. In addition, applicable City ordinances and General Plan policies would be implemented as appropriate to reduce the effects of additional development within the City.

Mitigation Measure 4.4.1 would be implemented during construction of the proposed Project to reduce potential Project impacts by ensuring avoidance, evaluation, and, as applicable, scientific recovery and study of any resources encountered. Therefore, with implementation of Mitigation Measures 4.4.1, the contribution of the proposed Project to the cumulative loss of known and unknown cultural resources throughout the City would be reduced to below a level of significance.

#### **4.4.7 Level of Significance Prior to Mitigation**

The proposed Project would not have a significant impact on known paleontological resources on the proposed Project. However, the Project has the potential to result in a substantial adverse impact to the significance of unknown (buried) paleontological resources within the Project site prior to mitigation, if there is excavation that extends deeper than 23 ft below the surface, or if there are any unanticipated discoveries at shallower depths.

#### **4.4.8 Mitigation Measure**

**Mitigation Measure 4.4.1 Paleontological Resources Impact Mitigation Program.** Prior to commencement of any grading or excavation activity on site, the City of Long Beach (City) Development Services Director, or designee, shall verify that a paleontologist has been retained on an on-call basis for all excavation from the surface to depths of 23 feet (ft) below the surface. Once a depth of 23 ft is reached, the paleontologist shall visit the site and determine if there is a potential for the sediments at this depth to contain paleontological resources.

A paleontologist shall not be required on site if excavation is only occurring in depths of less than 23 ft, unless there are discoveries at shallower depths that warrant the presence of a paleontological monitor. In the event that there are any unanticipated discoveries, the on-call paleontologist shall be called to the site to assess the find for significance, and if necessary, prepare a Paleontological Resources Impact Mitigation Program (PRIMP) as outlined below.

If excavation will extend deeper than 23 ft, exclusive of pile-driving and vibro-replacement soil stabilization techniques, the paleontologist shall prepare a PRIMP for the proposed Project. The PRIMP should be consistent with the guidelines of the Society of Vertebrate Paleontologists (SVP, 1995 and 2010) and shall include but not be limited to the following:

- Attendance at the pre-grade conference or weekly tailgate meeting if the PRIMP is initiated after the commencement of grading, in order to explain the mitigation measures associated with the Project.
- During construction excavation, a qualified vertebrate paleontological monitor shall initially be present on a full-time basis whenever excavation shall occur within the sediments that have a high paleontological sensitivity rating. Based on the significance of any recovered specimens, the qualified paleontologist may set up conditions that shall allow for monitoring to be scaled back to part-time as the Project progresses. However, if significant fossils begin to be recovered after monitoring has been scaled back, conditions shall also be specified that would allow increased monitoring as necessary. The monitor shall be equipped to salvage fossils and/or matrix samples as they are unearthed in order to avoid construction delays. The monitor shall be empowered to temporarily halt or divert equipment in the area of the find in order to allow removal of abundant or large specimens.
- The underlying sediments may contain abundant fossil remains that can only be recovered by a screening and picking matrix; therefore, these sediments shall occasionally be spot-screened through 1/8 to 1/20-inch mesh screens to determine whether microfossils exist. If microfossils are encountered, additional sediment samples (up to 6,000 pounds) shall be collected and processed through 1/20-inch mesh screens to recover additional fossils. Processing of large bulk samples is best accomplished at a designated location within the Project that shall be accessible throughout the Project duration but shall also be away from any proposed cut or fill areas. Processing is usually completed concurrently with construction, with the intent to have all processing completed before, or just after, Project completion. A small corner of a staging or equipment parking area is an ideal location. If water is not available, the location should be accessible for a water truck to occasionally fill containers with water.
- Preparation of recovered specimens to a point of identification and permanent preservation. This includes the washing and picking of mass samples to recover small invertebrate and vertebrate fossils and the removal of surplus sediment from around larger specimens to reduce the volume of storage for the repository and the storage cost.
- Identification and curation of specimens into a museum repository with permanent retrievable storage, such as the Natural History Museum of Los Angeles County (LACM).

- Preparation of a report of findings with an appended itemized inventory of specimens. When submitted to the City Development Services Director, or designee, the report and inventory would signify completion of the program to mitigate impacts to paleontological resources.

#### **4.4.9 Level of Significance after Mitigation**

Potential impacts to paleontological resources from the proposed Project would be mitigated to levels that are less than significant with implementation of Mitigation Measure 4.4.1. Therefore, with mitigation, the proposed Project would not result in any significant unavoidable impacts related to Cultural or Paleontological Resources.

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