

## 12.0 CULTURAL RESOURCES

This chapter assesses the effects of the proposed project on cultural resources, including districts, sites, buildings, structures, and objects that contain evidence of past human activities.

### 12.1 AFFECTED ENVIRONMENT

#### 12.1.1 Prehistory

People inhabited the project area for at least 11,000 years prior to the arrival of Spanish explorers to California in the 16th century. Until around 9,000 years before present (YBP), populations throughout California were small and the subsistence economies emphasized the capture of big game. From 9,000 to 4,000 YBP, advances in technology enabled more efficient use of certain plant foods, including grains and plants with hard seeds, and subsistence economies began to diversify. From 4,000 YBP until historic times, population densities increased and people began to occupy and use virtually all ecological niches in California. These populations became more sedentary, settling in larger villages, and the archaeological record shows evidence of increasing social stratification, ceremonialism, and long-distance trading activity (Chartkoff and Chartkoff 1984).

In the San Francisco Bay Area, prehistoric archaeological sites (habitation, temporary camp or task-specific sites) are found in the uplands surrounding extensive former marsh, usually above 40 feet in elevation. Aboriginal people like the European settlers who followed them, selected higher ground for camp sites and more permanent settlement. The higher ground afforded some protection from flooding and provided a good vantage point for viewing the surrounding area.

#### 12.1.2 Ethnography

Inhabitants of the project area at the time of European contact were the Coast Miwok peoples. The term “Miwok” refers to an ethnographic grouping of people who shared similar cultural and linguistic traits, and does not refer to a politically unified entity. The Coast Miwok, with their territory centered in Marin and Sonoma counties, were closely related linguistically to the Lake Miwok to the north. The Coast Miwok population prior to European contact has been estimated at 1,500 to 2,000 persons (Kroeber, 1925; Cook, 1943). By the early 1930s, only three individuals predominantly Coast Miwok in blood were known to exist.

Large Miwok villages were governed by a non-hereditary headman, but there was no overall tribal organization amongst the Coast Miwok. Miwok villages in the project region that existed at the time of European contact included *olompolli* (a State Historic Park), located approximately 3 miles northwest of the project site, and *coik ?eice(? [sic]*, located directly south of downtown Novato and approximately 3 miles southwest of the site. The Coast Miwok economy was based on a combination of fishing, hunting, and

gathering, and relied upon a diversity of resources. Marine foods and acorns were particularly important to Coast Miwok subsistence. Archaeological evidence from a time period that immediately precedes the historic period indicates that a highly developed monetary system, based on the exchange of disk clam-shell beads, had developed and that there was considerable trade between the Coast Miwok, Southern

Pomo, and other groups.

### **12.1.3 History**

The first known European contact in Coast Miwok territory was made by the landing party of Sir Francis Drake, whose English ship, the *Golden Hinde*, arrived either in the vicinity of Drakes Bay and Bolinas Bay on the coast or at Point San Quentin within San Francisco Bay in 1579. Drake was followed 16 years later by Rodriguez Cermeno, who sailed from the Phillipines on the Spanish ship *San Augustin*, arriving at Drakes Bay in 1595. Extensive Spanish exploration of the San Francisco Bay and northern California began around 1769 with the expedition of Gaspar de Portola. In 1776, the Spanish ship the *San Carlos*, commanded by Fernando Quiros, made its second exploration of San Francisco Bay and sent the first recorded expedition up the Petaluma River in hopes of finding a navigable connection to Bodega Bay.

The mission and presidio at San Francisco were established in 1776 and the missions in San Rafael and Sonoma were established some years later (1817 and 1823, respectively), partly in response to the Russian establishment of Fort Ross in 1812 and subsequent Russian settlement on lands north of San Francisco Bay. General Vallejo built the Petaluma Adobe and established a cattle ranch there in 1833-34, following an early exploration of that area (in 1823) by Father Jose Altimira. The Spanish carried out the forced evangelization of the Coast Miwok from the missions at San Francisco, San Rafael, and Sonoma. This, together with European-introduced diseases, such as smallpox, had a devastating effect on the Coast Miwok population.

Mexico achieved independence from Spain in 1821 and the following year, California was declared a territory of the Mexican republic. In 1834, the Mexican government secularized the missions and divided their vast holdings into individual land grants, or ranchos, opening the way for the emergence of a new landed elite, who introduced large-scale cattle ranching in California. Land grants in the Novato region were handed out to five recipients: Corte Madera de Novato to Scotsman John Martin, Rancho de San Jose to Ignacio Pacheco, Rancho Nicasio to Don Pablo de la Guerra and John Cooper, Rancho Olompali to the last Coast Miwok chief Olompali, and Rancho de Novato to Fernando Feliz.

Commercial activity between the United States and California increased during the Mexican Period, and the region experienced an influx of overland trappers and mountain men in search of beaver and other fur-bearing animals. Tensions between the new arrivals and native Californians intensified and hostility between the U.S. and Mexican governments culminated in outbreak of the Mexican War in 1846. The conflict was

marked by repeated American land and naval victories, and formally ended with the signing of the Treaty of Guadalupe Hidalgo in February 1848 and the cession of California to the United States.

Just over a week before the signing of the Treaty of Guadalupe Hidalgo, James Marshall discovered gold in the Sierra Nevada foothills while constructing a sawmill for John A. Sutter. Marshall's discovery led to a massive incursion of miners, prospectors, and settlers into California known as the Gold Rush (1848–1852). Although the gold seekers converged primarily on the interior mining country, the coastal regions attracted scores of merchants and settlers, who sought to take advantage of California's emerging maritime and agricultural economies.

In 1850, J.E. Lockwood came to Petaluma from San Francisco to try his hand at the market-hunting business that was booming in response to the need for fresh meat, and Petaluma soon became the main shipping point to San Francisco. Ships carried meat, agricultural products, and produce from the fruit production industry that soon sprouted up in the area. River transportation formed the backbone of subsequent commercial and industrial development (including ship building, hide tanning, railroad and road construction, banking and soap manufacturing) in the project area. New Town, later known as Novato, vied with Petaluma for control of the river shipping industry, but ultimately the upstream location won out.

As noted by Stillinger (1982), "...the shallowness and meandering course of the Petaluma River has been a continual problem to navigation." The first recorded modification of the Petaluma River channel was in 1862 and involved a steam dredge to deepen and straighten a portion of the river. Extensive dredging and other modifications of the river and its tributaries followed, much of it carried out by Chinese laborers. The spoils from extensive dredging projects were used to fill the adjacent marsh lands and to construct an extensive system of levees that opened up additional areas for agricultural production. By the end of the 19<sup>th</sup> century, shipping by rail had largely replaced shipping by river and the primary use of the Petaluma River was for recreational boating.

In 1844, the original recipient of the Rancho de Novato land grant, Fernando Feliz, sold the rancho to Jacob Leese, General Vallejo's brother-in-law in exchange for a small herd of livestock (110 cows, 50 bulls, 25 calves, 25 mares, and a stallion). The land changed hands numerous times over the next decade, finally landing in the hands of Joseph B. Sweetser and Francis DeLong, who had a partnership in the fruit industry. Sweetser and DeLong provided the funds for a public highway, railroad station, and school in the Novato area. In 1879, Sweetser conveyed all but the square mile that is today downtown Novato to DeLong. When DeLong died, his estate passed on to his son Frank C. DeLong. In 1893, the junior DeLong was forced to declare bankruptcy. His creditors set up the Novato Land Company which ran a successful fruit and ranching business on a portion of the former DeLong property, and the Home and Farm Company auctioned off 5 and 10 acre lots in the Black Point area.

In the early 1900s, the area known at the time as New Town, experienced considerable growth as a result of the existing train station and boom in rail shipping. In the 1950s, several attempts to incorporate as the City of Novato, failed. Success finally came in 1960, and massive growth soon followed, rapidly replacing much of the old charm and rural character of the city with subdivisions and shopping malls. However, some of the older more wild Novato still remains within the city limits.

Historical information on the project site itself is provided in the Introduction to this EIR (Section 1.2, Project Site History). In summary, the site was a tidal wetland until the 20<sup>th</sup> century, when the site was diked and converted into farmable land. The East Bahia peninsulas were built in conjunction with a planned housing development in 1965 using Bay Mud dredged from the West Bahia Lagoon and surrounding waterways. Although the Bahia site was originally diked for agricultural use, it has not been cultivated in more than 30 years.

#### **12.1.4 Research Methods**

A screening level analysis of cultural resources, consisting of archival research, review of historic maps, contact with Native American organizations, and site reconnaissance was undertaken for this project.

Archival research was conducted at the Northwest Information Center (NWIC) of the California Historical Resources Information System (CHRIS), located at Sonoma State University, Rohnert Park in September of 2005. Research included a review of cultural resources and cultural resource surveys within 1.0-mile of the project area. The following lists were reviewed:

- National Register of Historic Places (NRHP)
- California Register of Historical Resources (CRHP)
- California Inventory of Historic Resources (State of California 1976)
- California Points of Historical Interest (State of California 1992)
- Historic Spots in California (Kyle et al. 1990)

USGS topographic maps and historical maps were also studied, largely to understand details regarding the topography of the project area prior to extensive land alteration.

The California Native American Heritage Commission (NAHC) was contacted to incorporate the opinions and concerns of Native Americans in the project area. The NAHC consulted its Sacred Lands File for Native American burial sites and sacred places that could exist in the project area. The NAHC did not indicate the presence of Native American burial sites and sacred places in the project area, but cautioned that persons of Native American descent with an interest in the project area could have additional knowledge and/or concerns. The NAHC provided several Native American contacts for the project area. A list of the contacts supplied appears in Appendix C. Letters were mailed to these contacts informing them of the proposed project and soliciting their

comments and concerns regarding the project (see Appendix C). To date, no comments or concerns have been expressed by the individuals/groups contacted.

### **12.1.5 Cultural Resources in the Project Vicinity**

Records at the NWIC indicate that most of the project site has been previously surveyed for cultural resources. T.L. Jackson of Archaeological Consulting and Research Services, Inc. (ACRS) surveyed most of the project site in 1977 and recorded one prehistoric archaeological site on the property (CA-Mrn-477). In 1979, D. Chavez surveyed the remainder of the site, with the exception of Mahoney Spur. Chavez noted no changes to site CA-Mrn-477 since 1977, and had no new findings. There is no record of cultural resource survey of Mahoney Spur at the NWIC.

Table 12-1 contains a list of surveys conducted at the project site or on properties adjacent to or in the immediate vicinity of the project site.

Table 12-1 Cultural resource studies at the project site or within the immediate vicinity

NWIC survey report no.	Title and author	Date	Findings
S-952	<i>Letter report: Archaeological Reconnaissance of the Bahia Planned Community Development</i> (T. L. Jackson, Archaeological Consulting and Research Services, Inc. [ACRS])	1977	1 prehistoric site recorded (CA-Mrn-477); 30-40% of site removed
S-1655	<i>Archaeological Field Reconnaissance of the Bahia Development Area, Novato, Marin County, California</i> (D. Chavez)	1979	Covered portions of the 900-ac property not surveyed in 1977. CA-Mrn-477 in same condition as 1977. No new findings.
S-2348	<i>Archaeological Impact Evaluation of the Pinheiro Ridge Property,, a 383-ac parcel in northern Novato, California</i> (K. Flynn, Archaeological Resource Service)	1976	3 prehistoric sites recorded (CA-Mrn-448, -449, and -450). Historic trash dumps and possible abandoned homesteads noted.
S-2349	<i>Letter report: Rush Creek Ranch, Novato</i> (K. Flynn, Archaeological Resource Service)	1978	Evaluates potential effects of proposed Rush Creek Ranch development on recorded archaeological sites CA-Mrn-449 and CA-Mrn-450 and makes recommendations.
S-6989	<i>Letter report: Atherton Meadows Project Area, Novato</i> (D. Chavez)	1984	Evaluates potential effects of proposed Atherton Meadows development on recorded archaeological sites CA-Mrn-448, -449, and -450 and makes recommendations.
S-5000	<i>The Petaluma River: The Need for Regional Historic Research to Identify Archaeological Resources; an M.A. Thesis</i> (R.A. Stillinger)	1982	Regional overview study
S-17948	<i>Letter report: Field Inspection of Bahia Archaeological Sites CA-Mrn-187, -188, and -477</i> (T. Mears, Anthropological Studies Center)	1996	Mrn-187 and -188 outside the Bahia Development project area; unable to relocate -477.

Coast Miwok peoples inhabited the region prior to European contact. At least one archeological site associated with their habitation, a shell midden site (CA-Mrn-477), is located within the project boundaries. This site was discovered by N. C. Nelson in conjunction with his study of shellmounds of the San Francisco Bay area, between 1907 and 1909. More recent reconnaissance of the site in 1977 noted that approximately 30 to 40% of the site volume had been removed, significantly impacting the site’s integrity. A second shell midden site (CA-Mrn-189) was originally recorded within the project site boundaries, but was either mislocated or destroyed by development. Attempts to relocate and record this site have been unsuccessful.

Altogether, records at the NWIC indicate the existence of 5 previously recorded prehistoric archaeological sites within a 0.5-mile radius of the project and 6 previously recorded prehistoric archaeological sites (one of which may also have an historic component) within a 1-mile radius. These resources are summarized in Table 12-2 below.

Table 12-2 Recorded cultural resources within 1 mile of the project site

Trinomial site no.	Primary site no.	P/H	Distance from project site	Description
CA-Mrn-184	P-21-000209	P	<0.25 mile	Shellmound site; originally recorded by N.C. Nelson (1907); a supplement to the site record by ACRS (1975) indicates 30% of site remained intact.
CA-Mrn-189	P-21-000214	P	uncertain; <0.5 mile	Shellmound site; originally recorded by N.C. Nelson (1907) and thought to be within the project site. Subsequent inspection by C. Gerike, NWIC (1985) and M. Jablonowki, Sonoma State ACS (199) determined it was either mis-located or destroyed by development.
CA-Mrn-190	P-21-000215	P	<0.25 mile	Small shellmound; originally recorded by N.C. Nelson (1907)
CA-Mrn-191	P-21-000216	P	<1.0 mile	Shellmound site; originally recorded by N.C. Nelson (1907)
CA-Mrn-415	---	P	<1.0 mile	Petroglyph site with at least 41 cupules on two rocks that may have split from a single rock, recorded by T. Miller (1974); probably associated with Site CA-Mrn-503
CA-Mrn-448	P-21-000547	P	<1.0 mile	Two pecked cupules on a basalt outcrop with one possibly associated basalt chopper, recorded by Roop-Flynn (1976)
CA-Mrn-449	P-21-000404	P	<0.5 mile	Dense midden with scatter of obsidian and chert chipped tools, fire-cracked rock, and organic materials, originally recorded by N.C. Nelson (1909)
CA-Mrn-550	P-21-000405	P	<1.0 mile	At least 10 cupules on basalt outcropping, recorded by Flynn-Miller (1976)
CA-Mrn-477	---	P	within project site	Small shell midden, recorded by Jackson, ACRS (1977)
CA-Mrn-503	P-21-000449	P/H	<1.0 mile	Shell midden, with tools, clamshell bead, other features (petroglyphs on basalt boulder, historic debris scatter, possible adobe foundation), and human remains; Sites CA-Mrn-415 and -504 probably associated with this site; re-recorded Baker/Schoup (1980); after 1980-fill placed on top of site
CA-Mrn-504	P-21-000450	P	<1.0 mile	Bedrock mortar with 10 mortar holes

Levees and other earthworks at the site are part of the history of land development in the North Bay, but are similar to the structures observed at diked baylands throughout the North Bay. These on-site structures are not particularly interesting from an architectural, engineering, or historical point of view. No other structures of potential historic interest were noted at the site. Further, none of the archaeological sites or structures of potential historic interest have been formally evaluated for the CRHR or NRHP.

## 12.2 CRITERIA FOR DETERMINING SIGNIFICANCE OF EFFECTS

Appendix G of the *CEQA Guidelines*, the CEQA Environmental Checklist, poses the following questions to be considered in determining whether a project would cause significant impacts to cultural resources. A project would have a significant impact on cultural resources if it would:

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

For the purposes of the proposed Bahia Marsh Restoration Project, a significant effect on the environment may be said to occur if the project could result in a substantial adverse change in the significance of an historical resource (California Code of Regulations (CCR) Section 15064.5[b]). Impacts to resources that do not qualify as historical resources or "unique" archaeological sites are not considered significant, and need not be considered further in the CEQA process (Public Resources Code (PRC) Section 21083.2).

CEQA establishes statutory requirements for establishing the significance of historical resources in PRC Section 21084.1. The CEQA Guidelines (Section 10564.5[c]) also require consideration of potential project impacts to "unique" archaeological sites that do not qualify as historical resources. The statutory requirements for unique archaeological sites that do not qualify as historical resources are established in PRC Section 21083.2. These two PRC sections operate independently to ensure that significant potential effects on historical and archaeological resources are considered as part of a project's environmental analysis.

PRC Section 21084.1 defines historical resources as those listed on or eligible for listing on the CRHR. The CRHR establishes 50 years as the period in which sufficient time has passed to allow a scholarly perspective in understanding the historic importance of a resource. An historical resource must be significant at the local, state, or national level under one or more of the following four criteria:

- It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;
- It is associated with the lives of persons important to local, California, or national history;
- It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values; or
- It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

An historical resource must also retain the integrity of its physical identity that existed during the resource’s period of significance. Integrity under the CRHR is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association.

PRC Section 21083.2 defines a “unique archaeological resource” as 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:

- 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.
- Is directly associated with a scientifically recognized important prehistoric or historic event.

As noted above, under CEQA, a project may have a significant effect on the environment if the project could result in a substantial adverse change in the significance of a resource, meaning the physical demolition, destruction, relocation, or alteration of the resource would be materially impaired. This would include any action that would demolish or adversely alter the physical characteristics of an historic resource that convey its historic significance and qualify it for inclusion in the CRHR or in a local register or survey that meets the requirements of PRC Section 5020.1(l) and 5024.1(g).

The following steps normally are taken in a cultural resources investigation to comply with CEQA:

- Identify cultural resources.
- Evaluate the significance of the cultural resources.
- Evaluate the effects of a project on all cultural resources.
- Develop and implement measures to mitigate the effects of the project on significant cultural resources.

CEQA and the *CEQA Guidelines* also recommend provisions be made for the accidental discovery of archaeological sites, historical resources, or Native American human remains during construction (PRC Section 21083.2(i) CCR Section 15064.5[d and f]).

### **12.3 ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES**

A screening level cultural resource investigation was conducted for this project. As discussed above, this consisted of a record search at the NWIC, additional background research and review of historical maps, and contact with Native American organizations including the NAHC. Pedestrian surveys were not conducted in conjunction with this project. As identified above, one prehistoric archaeological site has been recorded within the project site, and an additional 10 archaeological sites have been recorded within 1.0 mile of the site.

The project site is considered to be highly sensitive for archaeological remains. The presence of numerous prehistoric archaeological sites in the vicinity is evidence the area was widely used by prehistoric peoples. Although the project area is generally considered archaeologically sensitive, the possibility of archaeological resources existing within the site's historic marshlands area or other areas that would be directly impacted by the Proposed Project or project alternatives is very slight. Permanent or even temporary occupation by prehistoric peoples would not have been located within the marshlands. Areas constructed from placed fill consisting of dredge spoils from the surrounding marshlands (e.g., the East Bahia peninsulas and the site's perimeter and internal levees) may contain isolated archaeological remains, but are unlikely to contain intact archaeological sites.

While unlikely, the possibility of encountering significant archaeological resources within the project area of impact cannot be ruled out. The project's historic marshlands may have been visited for exploitation of plant and animal resources and isolated artifacts of these subsistence activities may lie buried in the Bay muds. Human remains, found in isolation from other evidence of human occupation or activity, have been found in a marsh environment within the City of Sunnyvale. In addition, since San Francisco Bay was inundated following the introduction of the first humans to the project area, it is possible that archaeological resources could lie buried beneath the Bay muds.

### **12.3.1 Proposed Project**

Under the Proposed Project, restoration-related activities at the project site would not directly impact the prehistoric shell midden (CA-Mrn-477) there. It is possible that wind-wave action following the breaching of levees could further erode the site, which is already at least 30-40% destroyed. However, since standing water already covers the majority of the site for most or all of the year, wind-wave erosion following the proposed breaching is unlikely to increase substantially from the existing condition. Consequently, and due also to the site's apparent lack of integrity, indirect erosional impacts to the site are likely to be less than significant. The Proposed Project would not result in any changes to site access. Therefore, no special measures to preserve the site or protect it from possible vandalism are required.

Proposed ground-disturbing activities and use of heavy vehicles and machinery at the project site could damage as yet unrecorded and unknown archaeological sites or human remains. Measures to reduce the likelihood of unknowingly impacting archaeological sites and human remains as well as required contingency measures in the event of an unanticipated discovery are provided below.

**Cultural Resource Impact-1: Potential impact to unrecorded and unknown archaeological sites from ground disturbance and operation of heavy vehicles and machinery.**

Significance: Potentially significant, but mitigated.

**Mitigation A for Cultural Resources Impact-1: Contractors and construction personnel involved in ground-disturbing activities will be advised of the possibility of encountering cultural resources (including, but not limited to, chipped or ground stone, historic debris, building foundations, and non-human bone) during construction work. If such resources are encountered or suspected, work within 100 feet of the discovery will be halted immediately and DFG will be notified. A qualified professional archaeologist will be consulted, who will assess any discoveries and develop appropriate management recommendations for treatment of the resource.**

**Mitigation B for Cultural Resources Impact-1: There is low probability that historic archaeological materials (including, but not limited to, structural remains, privies, or refuse deposits containing metal, glass, and ceramic items) may be encountered. If this occurs, however, work within 100 feet of the discovery will be halted immediately and DFG will be notified. A qualified professional archaeologist will be consulted, who will assess any discoveries and develop appropriate management recommendations for treatment of the resource.**

**Mitigation C for Cultural Resource Impact-1: DFG will pursue a strategy of avoiding impacts to cultural resources, where feasible. If avoidance of potentially significant resources is determined to be infeasible, DFG will conduct a controlled archaeological test excavation to determine archaeological site significance. If a resource that cannot be avoided is determined to be significant, DFG and SHPO will consult to develop a plan for data recovery excavation. Data recovery excavations will then be completed by a qualified professional archaeologist in accordance with the plan.**

Post-mitigation Significance: Less than significant

**Cultural Resource Impact-2: Potential impact to unrecorded and undiscovered human remains from ground disturbance and operation of heavy vehicles and machinery.**

**(Note that according to the California Health and Safety Code, six or more human burials at one location constitute a cemetery [Section 8100], and disturbance of Native American cemeteries is a felony [Section 7052]).**

Significance: Potentially significant, but mitigated.

**Mitigation for Cultural Resource Impact-2: If bone is encountered and appears to**

**be human, California law (PRC Section 7050.5) requires that potentially destructive construction work in the vicinity of the find and in nearby areas reasonably suspected to overlie adjacent human remains is halted and the County Coroner (in the county where the find occurs) is contacted. After contacting the coroner, steps will be taken to contact the appropriate Native American individual or tribe and to determine the appropriate disposition of finds.**

Post-mitigation Significance: Less than significant

### **12.3.2 No Project Alternative**

The No Project Alternative would not cause significant cultural resource impacts at the project site. Wind-wave action from standing water at the site may continue to erode the on-site prehistoric archaeological site (CA-Mrn-477). Without maintenance, natural breaches in the levees would develop (it appears from the amount of year-round standing water at the site that some natural breaches may have already occurred). As breaches open up the site to tidal inundation, greater wind-wave action may further erode the archaeological site. Due to the site's lack of integrity and existing erosional forces at the site, this impact is considered less than significant.

### **12.3.3 Alternative 1 (Reduced Fill Removal from East Bahia)**

Cultural resource impacts under Alternative 1 are anticipated to be the same as those under the Proposed Project (i.e., no significant impacts to known cultural resources, but potential impacts to as yet undiscovered resources). Proposed mitigation is the same as that for the Proposed Project.

### **12.3.4 Alternative 2 (No Fill Removal from East Bahia)**

Cultural resource impacts under Alternative 1 are anticipated to be the same as those under the Proposed Project (i.e., no significant impacts to known cultural resources, but potential impacts to as yet undiscovered resources). Proposed mitigation is the same as that for the Proposed Project.