

## Section 3.13

### Tribal Cultural Resources

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This section addresses the project’s potential impacts relative to tribal cultural resources. Cultural resources include places, objects, and settlements that reflect group or individual religious, archaeological, architectural, or paleontological activities. By statute, “tribal cultural resources,” are generally described as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe and are further defined in Public Resources Code (PRC) Section 21074(a)(1)(A)–(B). Tribal cultural resources are generally described as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe and are further defined in PRC Section 21074(a)(1)(A)–(B).

The analysis in this section is based on the *Cultural Resources Inventory and Evaluation Report* (2022a; see Appendix E) prepared by ECORP Consulting, Inc. (ECORP) and peer reviewed by Michael Baker International, the City of Encinitas, and consultation with the San Pasqual Band of Mission Indians, Rincon Band of Luiseño Indians, Barona Band of Mission Indians, Jamul Indian Village, and San Luis Rey Band of Mission Indians. Due to the sensitive and confidential nature of cultural resources, portions of the report have been redacted. The analysis herein is further based on the *City of Encinitas General Plan* (1991) and the *City of Encinitas 2013-2021 Housing Element Update Environmental Assessment* (2018).

### **ENVIRONMENTAL SETTING**

The project site is located in the City of Encinitas, north of Plato Place and east of Piraeus Street. The site lies approximately 0.9 miles east of the Pacific Ocean and approximately 0.2 miles south of Batiquitos Lagoon. On-site elevations range from approximately 15 to 175 feet above mean sea level (ECORP 2022b).

The project site is located to the east of a drainage that flows north towards Batiquitos Lagoon. The underlying geology of the project area has been mapped as the Santiago Formation, dated back to the Middle Eocene (38-48 million years ago). Native geology of the area is categorized into three divisions: arkosic sandstone and conglomerate; gray and brownish gray arkosic sandstone; and gray arkosic sandstone and grit. Six soil types are located within the project site: Cieneba coarse sandy loam, 5 to 15 percent slopes, eroded; Corralitos loamy sand, 9 to 15 percent slopes; Gaviota fine sandy loam, 9 to 30 percent slopes; Gaviota fine sandy loam, 30 to 50 percent slopes; Marina loamy coarse sand, 9 to 30 percent slopes; and rough broken land (ECORP 2022a).

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The potential for buried pre-contact archaeological sites in the project area does exist because of the site's proximity to the Pacific Ocean and Batiquitos Lagoon. Additionally, the region is recognized to have been in regular use by Native Americans for thousands of years. The drainage located to the west of the site also contributes to this potential as pre-contact archaeological sites have been identified along perennial and intermittent waterways in the region (ECORP 2022a).

#### ***Cultural Resources Inventory Results***

##### **Records Search**

The area of potential effect (APE) represents the area that would be affected by project development, and therefore, could be subject to potential direct or indirect impacts on cultural resources if such resources are determined to be present. The boundaries of the APE analyzed include areas proposed for construction, vegetation removal, grading, trenching, stockpiling, staging, paving, and other such disturbance; refer to Appendix E for additional details.

A records search was conducted in February 2022 for the APE and a surrounding one-mile radius at the South Coastal Information Center (SCIC), part of the California Historical Resources Information System (CHRIS) maintained by the Office of Historic Preservation, at San Diego State University. The CHRIS records search determined that 35 previously recorded cultural resources are located within one mile of the project area. Resources were comprised of a mix of habitation/camp sites, shell middens, shell and lithic scatter, lithic and bone tools, a former flower nurse, a log house, a trash pit and building remains, and commercial buildings. A portion of one previously recorded resource (CA-SDI-12130), containing shell middens, lithic scatters, hearth features, and stone tools, is located within the APE (ECORP 2022a).

The National Register Information System did not list any eligible or listed properties within the project area. The nearest National Register properties are located eight miles northwest of the project area in Carlsbad. Resources listed as California Historical Landmarks and by the Office of Historic Preservation were reviewed on February 7, 2022. The nearest listed landmark is #940: Rancho Guajome, located 12 miles north of the project area (ECORP 2022a).

##### **Sacred Lands File Results**

The California Native American Heritage Commission (NAHC) identifies, catalogs, and protects Native American cultural resources on private and public lands in California. Cultural resources include graves, cemeteries, and places of special religious or social significance to Native Americans. The NAHC also records the historical territories of state recognized tribes into a database called the Sacred Lands File. A records search of the Sacred Lands File is conducted to ensure that the tribes potentially affected by a project are properly notified and consulted.

A search of the Sacred Lands File was completed by the NAHC and resulted in a negative finding, indicating that no Native American Sacred Lands have been recorded in the Study Area (ECORP 2022a).

### **Site Survey and Subsurface Testing Results**

A site survey was conducted in March 2022 and subsurface testing was conducted in April 2022. No tribal cultural resources were identified as a result of the site survey or subsurface testing; however, one previously documented cultural resource (Site CA-SDI-12130) was identified during the subsurface testing (refer also to EIR Section 3.4, Cultural Resources). The proposed off-site preserve area is entirely within resource CA-SDI-12130. The western two-thirds of the project site is within resource CA-SDI-12130 (ECORP 2022a).

### **Tribal Consultation**

In conformance with State Assembly Bill (AB) 52, the City of Encinitas sent notification to the Native American tribes identified as previously requesting such notification of development projects within the City on August 24, 2022. These tribes included San Pasqual Band of Mission Indians, Rincon Band of Luiseño Indians, Barona Band of Mission Indians, Jamul Indian Village, and San Luis Rey Band of Mission Indians. Of the tribes who received such notification, five requested formal government-to-government consultation pursuant to AB 52 to discuss the potential for tribal cultural resources to be located on-site or in the project vicinity. ~~Consultation with the tribes remains ongoing.~~

Additionally, on October 21, 2022, ECORP participated in a field meeting with the Tribal Historic Preservation Officer (THPO) for the Rincon Band of Luiseño Indians and the project proponent. The THPO recommended monitoring by a Luiseño tribe during construction due to the overall sensitivity of the area and agreed to a need to pre-designate a reburial location in the event of an unanticipated discovery. On November 1, 2022, the project proponent participated in a field meeting with a member of the San Luis Rey Band of Mission Indians. The tribal representative indicated that tribal monitoring would be recommended (ECORP 2022a).

## **REGULATORY FRAMEWORK**

### ***State***

#### **Assembly Bill 52**

California Assembly Bill (AB) 52 (2014) established a formal consultation process for California tribes in the CEQA process. The bill specifies that any project that may affect or cause a substantial adverse change to the significance of a tribal cultural resource would require a lead

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agency to “begin consultation with a California Native American tribe that is traditional and culturally affiliated with the geographic area of the proposed project.” A tribal cultural resource is defined as a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American tribe that is:

- Listed or eligible for listing in the California Register of Historical Resources or a local register of historical resources;
- Determined by the lead agency to be significant pursuant to criteria set forth in PRC Section 5024.1;
- A geographically defined cultural landscape that meets one or more of these criteria; or
- A historical resource described in PRC Section 21084.1, a unique archaeological resource described in PRC Section 21083.2, or is a non-unique archaeological resource if it conforms with the above criteria.

AB 52 provides guidance for consultation between California Native American tribes and lead agencies to address potential impacts of development activities on known or unknown tribal cultural resources and to identify appropriate mitigation for such impacts. PRC Section 21074(a) defines tribal cultural resources, indicating that a project having the potential to cause a substantial adverse change to a tribal cultural resource is a project that may have an adverse environmental effect.

Under AB 52, tribes that wish to be notified of projects subject to CEQA are to send a letter to the lead agency making it known they wish to be notified. The City is then obligated to send notifications inviting consultation to the requesting tribe for all subsequent projects subject to CEQA.

**California Native American Graves Protection and Repatriation Act**

The California Native American Graves Protection and Repatriation Act (25 U.S. Code 3001 et seq.) was enacted in 2001. Pursuant to the act, federal and state institutions and museums that receive federal funding and having possession or responsibility for collections of human remains or cultural artifacts are required to return Native American cultural items to their respective peoples. In addition, the act establishes a program of federal grants to assist in the repatriation process and authorizes the Secretary of the Interior to assess civil penalties on museums that fail to comply.

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**California Health and Safety Code Sections 7050.5, 7051, and 7054**

California Health and Safety Code Sections 7050.5, 7051, and 7054 collectively address the illegality of interference with human burial remains as well as the disposition of Native American burials in archaeological sites. The law protects such remains from disturbance, vandalism, or inadvertent destruction and establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project, including the treatment of remains prior to, during, and after evaluation, and reburial procedures.

***Local***

**City of Encinitas General Plan**

*Resource Management Element*

The Resource Management Element of the General Plan addresses both archaeological and historical cultural resources. The element includes maps of the City identifying areas of low, moderate, and high cultural resource sensitivity. The element identifies mitigation procedures for archaeological sites discovered during the excavation or construction phases of a new project. It also calls for an inventory of all historically significant sites and/or structures that require protection.

The following goal and policies are relevant in protecting tribal, cultural, and paleontological resources in the City.

**GOAL 7:                   The City will make every effort to ensure significant scientific and cultural resources in the Planning Area are preserved for future generations.**

Policy 7.1:               Require that paleontological, historical and archaeological resources in the planning area are documented, preserved or salvaged if threatened by new development.

Policy 7.2:               Conduct a survey to identify historic structures and archaeological/cultural sites throughout the community and ensure that every action is taken to ensure their preservation.

**City of Encinitas Municipal Code**

Section 30.34.050, Cultural/Natural Resources Overlay Zone, of the City's Municipal Code (Chapter 30.34, Special Purpose Overlay Zones) includes regulations that apply to areas within the Special Study Overlay Zone where site-specific analysis indicates the presence of sensitive cultural, historic, and biological resources, including sensitive habitats. For parcels containing

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archaeological or historical sites, the Municipal Code requires a site resource survey and impact analysis to determine the significance of, and possible mitigation for, sensitive resources.

**IMPACT ANALYSIS AND MITIGATION MEASURES*****Thresholds of Significance***

The following thresholds of significance are based on CEQA Guidelines Appendix G. For the purposes of this EIR, the project would be considered to have a significant impact on tribal cultural resources if it would:

1. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
  - Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k); or
  - A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

**PROJECT IMPACTS AND MITIGATION*****TRIBAL CULTURAL RESOURCES***

**Impact 3.13-1      The project could cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe. Impacts would be less than significant with mitigation incorporated.**

The NAHC was contacted to request a search of the Sacred Lands File in March 2022. The record search did not identify any sacred lands within the project boundary (ECORP 2022a). However, the absence of specific site information does not necessarily indicate the absence of cultural resources in the project area, as unknown cultural resources may be located on-site.

On August 24, 2022, the City sent correspondence to the relevant tribes on the City's official AB 52 notification list via email and US certified mail, identifying the location of the project site and the intentions for future development of the subject property by the project applicant. Responses were received from the San Pasqual Band of Mission Indians, Rincon Band of Luiseño Indians, [Jamul Indian Village](#), and San Luis Rey Band of Mission Indians requesting formal consultation with the City under AB 52.

The Barona Band of Mission Indians (Mr. Art Bunce, Tribal Attorney) responded on September 15, 2022 via email correspondence indicating that he represented the tribe regarding cultural resources issues and AB 52 consultations, at the report of Chairman Raymond Welch and the Tribal Council. Mr. Bunce indicated that he had reviewed the relevant portions of the Phase I Archaeological Resources Survey (prepared for the project by ECORP Consulting; see Appendix E). Mr. Bunce indicated that, consistent with the findings of the report, the potential for significant subsurface artifacts and other materials in undisturbed areas of the project site does exist. As a result, Mr. Bunce stated that the Barona Band would like to request that the mitigation measures as recommended in the technical report be implemented. No further consultation with the City relative to AB 52 was requested by the tribe. To allow for further review and comment, as well as disclosure of relevant results of City consultation with the other tribes, the Barona Band will receive all public notices as to the availability of the CEQA document.

As indicated above, on October 21, 2022, ECORP participated in a field meeting with the THPO for the Rincon Band of Luiseño Indians and the project proponent. The THPO recommended monitoring by a Luiseño tribe during construction due to the overall sensitivity of the area and agreed to a need to pre-designate a reburial location in the event of an unanticipated discovery. On November 1, 2022, the project proponent participated in a field meeting with a member of the San Luis Rey Band of Mission Indians. The tribal representative indicated that tribal monitoring would be recommended (ECORP 2022a).

~~Consultation with the tribes remains ongoing.~~ If no tribal cultural resources are identified during the consultation process, a significant impact to known tribal cultural resources would not occur. However, subsurface construction disturbances (e.g., trenching, excavation, grading) associated with the project would have the potential to impact unknown tribal cultural resources.

As noted above, one previously recorded cultural resource site (CA-SDI-12130) was documented on a portion of the site as a result of the field survey; however, the resource was evaluated based on archaeological information as not eligible for listing under Criterion D/4 for the National Register of Historic Places and the California Register of Historical Resources. Tribal consultation under Assembly Bill 52 with the City of Encinitas, Rincon Band of Luiseño Indians, the San Luis Rey Band of Mission Indians, and San Pasqual Band of Mission Indians resulted in the recommendation for tribal monitoring during construction and pre-designation of a reburial area,

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in the event of an unanticipated discovery during construction, and whether or not the site is potentially significant as a tribal cultural resource will be determined by the City in consultation with the tribes.

ECORP evaluated the portion of precontact cultural resource P-37-012130 that is within the area proposed for development and found it not eligible for inclusion on the NRHP or CRHR under any criteria based on archaeological information. ~~Tribal consultation between the City and culturally affiliated tribes is ongoing.~~ The determination ~~about~~ of project impacts ~~on~~ to tribal cultural resources is being addressed separately by the City. No ground disturbance should occur until the lead agencies concur with this finding.

The project could result in a significant impact to this resource based on pending tribal consultation.

Although no currently known significant cultural, tribal cultural, or historic resources have been identified on-site, in order to ensure proper protection of any unknown resources, should they be encountered during project-related ground disturbance activities, Native American monitoring is required. Monitoring would allow for any discovery of unknown resources to be readily managed in accordance with federal and state law to prevent potential damage (refer to mitigation measures **CR-1** to **CR-3**). With implementation of mitigation measures **CR-1** to **CR-3**, impacts would be **less than significant with mitigation incorporated**.

**Mitigation Measures:** The mitigation measures for Impact 3.13-1 are the same as mitigation measures **CR-1** to **CR-3**, which were previously described under Impact 3.4-1 of this EIR. Mitigation measures **CR-1** to **CR-3** are repeated in this section for the reader's convenience.

**CR-1 Cultural Resources Monitoring Program.** Prior to the commencement of any ground disturbing activities, a Cultural Resource Mitigation Monitoring Program shall be established to provide for the identification, evaluation, treatment, and protection of any cultural resources that are affected by or may be discovered during the construction of the proposed project. The monitoring shall consist of the full-time presence of a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for ~~prehistoric~~ "pre-historic" (i.e., pre-contact) and historic archaeology. Further, a Native American monitor from ~~a~~ each tribe that is traditionally and culturally affiliated (TCA) with the project area that has requested tribal cultural monitoring during the AB52 Consultation process shall be retained to monitor all ground-disturbing activities associated with project construction, including vegetation removal, clearing, grading, trenching, excavation, or other activities that may disturb original (pre-project)



ground, including the placement of imported fill materials and related roadway improvements (i.e., for access).

- The requirement for cultural resource mitigation monitoring shall be noted on all applicable construction documents, including demolition plans, grading plans, etc.
- Prior to the start of construction activities, the project proponent shall submit a letter of engagement or a copy of a monitoring contract to the City to demonstrate that each archaeological and culturally affiliated Native American monitors have been retained for the project.
- The qualified archaeologist and each TCA Native American monitor shall attend all applicable preconstruction meetings with the contractor and/or associated subcontractors.
- Monitors shall be provided at least 72 hours notice of the initiation of construction and be kept reasonably apprised of changes to the construction schedule. In the event that a monitor is not present at the scheduled time, work can continue without the monitor present, as long as the notice was given and documented.
- A reburial location shall be identified as an “environmentally sensitive area” on project plans and communicated to the consulting tribes. If cultural materials discovered during project construction are reburied in this location, the landowner shall record a deed restriction over the reburial area within 30 days of the completion of ground disturbing activities. If the location is not used for reburial of materials, then recording a deed restriction on this location shall not be not required.

#### *During Construction*

- The qualified archaeologist shall maintain ongoing collaborative consultation with ~~the~~ each TCA Native American monitor during all ground-disturbing or altering activities, as identified above.
- The qualified archaeologist and/or each TCA Native American monitor shall have the authority to temporarily halt ground-disturbing activities if archaeological artifact deposits or cultural features are discovered. In general, if subsurface deposits believed to be cultural or human in origin are discovered during construction, all work shall halt within a 100-foot radius of the

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discovery and ground-disturbing activities shall be temporarily directed away from these deposits to allow a determination of potential significance, the subject of which shall be determined by the qualified archaeologist and the TCA Native American monitor(s). Ground-disturbing activities shall not resume until the qualified archaeologist, in consultation with ~~the~~ each TCA Native American monitor, deems the cultural resource or feature has been appropriately documented and/or protected. At the qualified archaeologist's discretion, the location of ground-disturbing activities may be relocated elsewhere on the project site to avoid further disturbance of cultural resources.

- If the professional archaeologist determines with full agreement from the TCA monitor(s) that the find does not represent a cultural resource, work may resume immediately and no agency notifications are required.
- The avoidance and protection of discovered unknown and significant cultural resources and/or unique archaeological resources is the preferable mitigation for the proposed project. If avoidance is not feasible, a Data Recovery Plan may be authorized by the City as the lead agency under CEQA. If a Data Recovery Plan is required, then ~~the~~ each TCA Native American monitor shall be notified and consulted in drafting and finalizing any such recovery plan.
- The qualified archaeologist and/or each TCA Native American monitor may also halt ground-disturbing activities around known archaeological artifact deposits or cultural features if, in their respective opinions, there is the possibility that they could be damaged or destroyed.
- The landowner shall relinquish ownership of all tribal cultural resources collected during the cultural resource mitigation monitoring conducted during all ground-disturbing activities, and from any previous archaeological studies or excavations on the project site, to ~~the~~ each TCA Native American Tribe for respectful and dignified treatment and disposition, including reburial, in accordance with the tribe's cultural and spiritual traditions. All cultural materials that are associated with burial and/or funerary goods will be repatriated to the most likely descendant as determined by the Native American Heritage Commission per California Public Resources Code Section 5097.98.

**CR-2**

**Prepare Monitoring Report and/or Evaluation Report.** Prior to the release of the Grading Bond, a Monitoring Report and/or Evaluation Report, which describes the

results, analysis and conclusions of the cultural resource mitigation monitoring efforts (such as but not limited to the Research Design and Data Recovery Program), shall be submitted by the qualified archaeologist, along with the TCA Native American monitor's notes and comments, to the City's Development Services Director for approval.

**CR-3**

**Identification of Human Remains.** As specified by California Health and Safety Code Section 7050.5, if human remains are found on the project site during construction or during archaeological work, the person responsible for the excavation, or his or her authorized representative, shall immediately notify the San Diego County Coroner's office by telephone. No further excavation or disturbance of the discovery or any nearby area reasonably suspected to overlie adjacent remains (as determined by the qualified archaeologist and/or the TCA Native American monitor) shall occur until the coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code 5097.98. If such a discovery occurs, a temporary construction exclusion zone shall be established surrounding the area of the discovery so that the area would be protected (as determined by the qualified archaeologist and/or the TCA Native American monitor), and consultation and treatment could occur as prescribed by law. As further defined by state law, the coroner shall determine within two working days of being notified if the remains are subject to his or her authority. If the coroner recognizes the remains to be Native American, he or she shall contact the Native American Heritage Commission (NAHC) within 24 hours. The NAHC shall make a determination as to the most likely descendent. If Native American remains are discovered, the remains shall be kept in situ ("in place"), or in a secure location in close proximity to where they were found, and the analysis of the remains shall only occur on-site in the presence of the TCA Native American monitor.

**Level of Significance:** Less than significant with mitigation incorporated.

**CUMULATIVE IMPACTS**

**Impact 3.13-2      The project could result in cumulative impacts related to tribal cultural resources. Impacts would be less than cumulatively considerable with mitigation incorporated.**

***Geographic Scope***

Relative to CEQA, the importance of a tribal cultural resource is the value of the resource to California Native American tribes culturally affiliated with a certain project area. On a cumulative level, the cumulative loss of the tribal cultural resource must therefore be evaluated. No impact would occur if development would avoid or otherwise preserve known tribal cultural resources within dedicated on-site open space. However, if such resources cannot be avoided or preserved, an impact would occur, and consideration of how the loss of the resource, in combination with other tribal cultural resources, is included in this cumulative analysis.

The geographic scope of the cumulative analysis is the area of any tribe requesting consultation under AB 52. For this project, the cumulative area is the geographic area with which affected tribes are traditionally and culturally affiliated.

Cumulative impacts to tribal cultural resources would occur when impacts resulting with the proposed project, in conjunction with potential cumulative projects listed in Table 3.0-1 and Figure 3.0-1 in Section 3.0 of this EIR and other development projects that would also involve ground disturbance with the traditionally and culturally affiliated area of tribes consulted under AB 52, would result in multiple and/or cumulative impacts to tribal cultural resources.

Additionally, to be conservative, the cumulative analysis is based on the “worst-case” assumption that all 2019 HEU sites develop under maximum density bonus unit allowances. The cumulative impact analysis includes all 2019 HEU sites to the extent they may contribute to certain issue-specific cumulative effects (see Table 3.0-2).

***Potential Cumulative Impacts***

Urban development that has occurred over past decades in San Diego County has resulted in adverse impacts on innumerable tribal cultural resources. However, the adoption of state and federal laws related to tribal cultural resources, such as AB 52, have provided a mechanism for consultation between California Native American tribes and lead agencies to address potential impacts of development activities on known and/or unknown tribal cultural resources. Although inadvertent discoveries and potential impacts may still result on a project by project basis based on location, development type, and availability of data, compliance with regulatory procedures generally mitigate potential impacts to tribal cultural resources.

Federal, state, and local laws protect tribal cultural resources in most instances, but this is not always feasible, particularly when in-place preservation may complicate the implementation of a development project. Future development may conflict with these resources through inadvertent destruction or removal resulting from grading, excavation, and/or construction activities.

It is possible that subsurface resources are present on the project site that have not yet been identified. Although unlikely, project-related ground-disturbing activities could uncover previously unknown prehistoric or historic, as resources within project boundaries. Therefore, the project has the potential to incrementally contribute to the disturbance of previously unknown cultural resources.

The project would implement mitigation measures **CR-1 to CR-3**, which address the discovery and recovery of unknown tribal cultural resources (including human remains) through construction monitoring, identification of potential tribal cultural resources, and evaluation of the significance of a discovery. Such mitigation measures would be implemented to reduce potential impacts from project construction on undiscovered resources, if encountered, to less than significant. Similarly, with conformance to applicable federal, state, and local regulations, combined with the implementation of mitigation, it is anticipated that other cumulative development projects would be adequately addressed and impacts on tribal cultural resources would be reduced to the extent feasible.

Therefore, individual project-level impacts associated with tribal cultural resources would be less than significant with incorporation of mitigation measures **CR-1 to CR-3** and the proposed project and cumulative projects would be subject to conformance with applicable federal, state, and local requirements for the protection of such resources. Therefore, the project's contribution to cumulative impacts on tribal cultural resources is considered **less than cumulatively considerable**.

**Mitigation Measures:** Implement mitigation measures **CR-1 to CR-3**.

**Level of Significance:** Less than cumulatively considerable.

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