
IV. ENVIRONMENTAL IMPACT ANALYSIS

E. CULTURAL RESOURCES

INTRODUCTION

The information and analysis in this section is based primarily on the following reports:

- Archaeological Test Excavations at the Snowcreek Site (CA-MNO-3), Mammoth Lakes, California, prepared by Trans-Sierran Archaeological Research (TSAR), November 1990 (i.e., “Archaeological Test Excavations”).
- Excavations at Snowcreek Site, Contributions to Trans-Sierran Archaeology 58, Mammoth Lakes, California, prepared by TSAR, May 2006 (i.e., “Excavations at Snowcreek”).
- Technical and Cost Proposal Archaeological Studies Snowcreek VIII, Mammoth Lakes, California, prepared by TSAR, September, 5 2006 (i.e., “Technical and Cost Proposal”).
- Preliminary Report of Survey and Testing for the Snowcreek Phase VIII Development, Mammoth Lakes, California, prepared by TSAR, November, 15 2006 (i.e., “Preliminary Report”).
- Peer Review of Cultural Resources Studies for the Snowcreek VIII Master Plan EIR, Town of Mammoth Lakes, Mono County, prepared by SWCA Environmental Consultants, November 18, 2006 (i.e., “Review of Studies”).
- Cultural Resources Study for the Snowcreek VIII Master Plan, Mammoth Lakes, California, prepared by TSAR, December 2006 (i.e., “Cultural Resources Study”).

The Cultural Resources Study and accompanying peer review memoranda are included in Appendix E of this EIR.

ENVIRONMENTAL SETTING

Prehistory and History Summary

Archaeological surveys conducted throughout the Mammoth Lakes region for various projects have identified numerous archaeological sites throughout the region. The majority of sites have been characterized as stoneworking, but subsistence sites have also been identified including rockshelters and hunting camps. The Mammoth Lakes area was an intersection of several ethnic groups including the Mono Lake Paiute to the north, the Owens Valley Paiute to the south, Benton and Round Valley Paiute to the east, Monache to the west, and the Southern Sierra Miwok to the northwest. The area provided a variety of food sources during snow-free months including fish, small game, deer, antelope, in addition to

roots and greens. Trade and travel most likely occurred in the summer months when the high Sierran passes were free of deep snow.

During the Pre-Medithermal (pre-3500 B.C.) and Medithermal (3500 B.C. to 1200 B.C.) period, occupation of Long Valley was most likely sporadic. During the Newberry period (1200 B.C. to A.D. 600) obsidian quarrying, and biface production were intensive in Long Valley. During the Haiwee (A.D. 600 to 1300) and Marana (1300 to historic) periods, biface production decreased and subsistence activity increased. Occupation sites in the Long Valley are typically associated with riparian settings. Pinyon exploitation did not begin intensively until the Haiwee period and there may have been a partial abandonment or reduction in the use of upland and desert scrub areas after A.D. 1000.

Prospecting and mining in the Mammoth Lakes area began in the late 1870s. The Mammoth Mining Company was organized and four townsites were built to the west of the Project site including Pine City, Mill City, Mammoth City, and Mineral Park. Old Mammoth Road, which crosses the Project site, most likely dates back to this time. In the 1880s cattle and lumber replaced mining as the main enterprise in the area. In the early 1900s recreation and tourism became a dominant industry in the region.

Literature Review and Records Search

As part of the Cultural Resource Study (2006) included in Appendix E to this EIR, TSAR conducted a review of pertinent literature and cultural resources research addressing the Project site and immediate vicinity. This review included a search of the California Historical Resources Information System (CHRIS) records housed at the Eastern Information Center (EIC) at the University of California, Riverside. This records search was intended to find all cultural resources studies, previously recorded historic sites, and previously recorded prehistoric archaeological sites filed with the EIC for the Project site and a 0.5-mile radius surrounding the Project site. EIC sources reviewed included:

- The EIC's historical resources files (site records).
- National Register of Historic Places (NRHP) (Office of Archaeology and Historic Preservation 1997).
- California State Historic Resources Inventory.
- California Points of Historical Interest (California Department of Parks and Recreation 1992).
- California Historical Landmarks (California Department of Parks and Recreation 1990).
- USGS Quadrangles: Old Mammoth, CA 1994 (7.5 minute).
- General Land Office (GLO) plats.

- Aerial Photographs (from 1942 to present).
- GeoFinder Historical Resource Database.

Two sites are known within the Project area, archaeological site CA-MNO-3, which includes remnants of the “Old Mammoth” townsite, and CA-MNO-893H, the Bodle Ditch. Each of these is discussed separately below.

Archaeological Surveys

Over half the area in and around the Town of Mammoth Lakes has been surveyed for cultural resources for timber sales, resort development, land exchanges, and other projects. Areas developed prior to 1983, when cultural resources surveys became part of the standard environmental review for developments on private land, have not been surveyed. Over 50 archaeological sites, including prehistoric quarries, workshops, plant procurement sites, and temporary camps, have been recorded within the Town of Mammoth Lakes. Most of these sites can be characterized as sparse- to heavy-density lithic scatters, most evidently temporary camps related to obsidian production and trade. Only a few historic-era sites, mostly cabins and small trash dumps, have been recorded. Ten archaeological surveys have been previously conducted within the Project area, covering the entire 237 acres of the Project site. However, the survey intensity is not known for over 100 acres in the western portion of the Project site. Nine surveys were undertaken when the area was public land administered by the Inyo National Forest. These studies were considered adequate to meet Federal requirements, which are similar to, or more strict than, California State law, and were sufficient to transfer the land out of Federal ownership. However, because some surveys are over 20 years old, some resources that did not qualify as historic at the time of the original survey, may now be considered historic.

No additional sites meeting CHRIS criteria were encountered within the Project area during the survey completed in the fall of 2006. However, four additional bedrock milling stations were encountered within the CA-MNO-3 site.

Archaeological Site CA-MNO-3 (with remnants of the “Old Mammoth” Townsite)

The CA-MNO-3 site consists of approximately 18 acres of extensive lithic scatter and seven bedrock milling features and midden (culturally modified soils) along Mammoth Creek. The site was preliminarily identified as potentially significant because of the density and diversity of cultural material present.

Field work completed for Archaeological Test Excavations (1990) consisted of the manual excavation of 11 one-by-one meter units and two mechanically excavated trenches. Over 90,000 artifacts, ecofacts (such as charcoal), and other samples were recovered including 89,758 pieces of debitage (small pieces of stone debris that break off during the manufacturing of stone tools), 218 flaked stone tools, 68 preforms (material that has undergone preliminary shaping but is not yet in its final form), roughouts and blanks

(thick, shaped stone bifaces of suitable size and configuration for refining into a stone tool), 10 cores, a hammerstone, seven ground stone artifacts, a sherd (fragment of pottery or other ceramic vessel), seven bone fragments, fire-cracked rock, charcoal, and historic artifacts. Analysis included flaked stone classification and debitage analysis, soil chemistry, seven radiocarbon assays, 178 source-specific obsidian hydration readings, and X-ray fluorescence sourcing of obsidian. Historic artifacts that likely post date 1900 were recovered including wire and square nails, fragments of white ware plates, glass fragments, and two metal buckles.

Analyses of recovered materials suggests that the site was first used approximately 4,000 years ago, but that the primary use of the site was during the Newberry and Haiwee periods (1200 B.C. to A.D. 1300). Earlier occupation was limited to use as a temporary camp for non-hunting subsistence related activities. Approximately 1,000 years ago, subsistence and biface production increased at the site, peaking around A.D. 1200. Four distinct areas, A through D, were identified. Area A, located in the northwest adjacent to Mammoth Creek, was determined to have been the site of a subsistence-related base camp dating to the Haiwee period. Area B, located in the southeast in the meadow, was determined to have been the site of a subsistence-based temporary camp dating to the Newberry period. Area C, located on the southwest ridgetop, was determined to have been a workshop or stone reduction area dating to the Haiwee period. Area D consists of fill brought in during modern construction activities. The probable source of the fill is CA-MNO-722 located less than one-quarter mile away. Additionally, a fifth site area was identified during work conducted in 1991 along the north side of CA-MNO-3 between Areas A and D. This area was utilized most intensively during the Haiwee period with activities that included large-scale production of bifacial performs and roughouts with some subsistence activities.

Field work described in Excavations at Snowcreek (2006) included the controlled excavation of 16 one-by-two meter units. Disturbance was evident to a depth of 110 centimeters and many units were crossed by modern or historic pipe. However, prehistoric cultural material extended to over 150 centimeters in depth in some areas investigated and disturbance was localized and small in scale. Numerous flaked stone tools, hundreds of bifaces, abundant debitage, manos, metate fragments (stone artifact used for processing grain and seeds), a hammerstone, and other artifacts were recovered. Historic artifacts date to the early twentieth century, with trash deposits indicating deposition between 1912 and 1930.

As discussed in the Cultural Resources Study (2006), archaeological work included background research, pedestrian archaeological survey of 177 acres, recording of historic features, and excavation of 79 shovel tests. Field work was completed in the fall of 2006 and included the recording through taped measurements, sketch maps, GPS readings, and photographs of the historic-period features. All but one of the historical features identified are located outside of the Project site. The shovel tests were completed from Minaret Road west to the edge of the Project area, northeast of the Snowcreek Rental office. Prehistoric, historic, and modern artifacts were found in all shovel test units. Over 6,000 prehistoric and over 400 historic or modern artifacts were recovered. Prehistoric artifacts included projectile points, finished biface tools, trade bifaces, retouched flakes, unfinished flake stone tools, debitage, cores and core fragments, and fire-cracked rock. Historic artifacts included fragments of glass

bottles, structural remains, leather, rubber, concrete, and bottle caps. Results of the work indicate that there are still substantial prehistoric and possibly historic deposits north of Old Mammoth Road.

As discussed in the Cultural Resources Study (2006), the “Old Mammoth” townsite extends into the Project area and overlaps a portion of the CA-MNO-3 site. The “Old Mammoth” townsite, Mammoth’s first resort, includes the two-story Wildasinn Hotel (later destroyed by fire). The hotel was built by Charles F. Wildasinn and power for the hotel was supplied by a Knight Wheel that had been salvaged from mining operations. Wildasinn also built a cabin (which still stands), a small store, and sawmill. All of the buildings, save the cabin, were bought by Charlie Summers, who built a new hotel and store called Mammoth Camp in 1918. From 1918 to 1927, Mammoth Camp consisted of a two-story rooming house and hotel, a barn, corrals, Wildasinn’s cabin, and a few other cabins, some of which still remain. In 1927, a fire destroyed most of Mammoth Camp. By the 1930s the Town, known simply as “Mammoth,” consisted of a service station (built in 1923), a trading post, a grocery store, a cafe, the Wildasinn cabin, and five or so other cabins north of Old Mammoth Road, within and west of the project area. A Forest Service ranger station, a bakery, and a garage were located to the east, where today Old Mammoth Road crosses Mammoth Creek. When State Highway 203 was completed to the north of old Mammoth in 1937, most businesses moved there. The parcel was bought by Frank Arcularius and fences were constructed to facilitate cattle grazing. In the 1970s, the Dempsey Corporation bought the land and acquired the adjacent Forest Service parcels.

A brass interpretive plaque is located on a boulder near the Knight Wheel and shed. The original part of the Wildasinn Cabin is still clearly visible, in spite of more recent additions. However, until the Cultural Resources Study (2006), neither the existing structures nor the archaeological features of Old Mammoth had been recorded as a historic property in the California Historical Resource Inventory System.

Location

Site CA-MNO-3 extends along Mammoth Creek into the north and west parts of the Project site and includes remnants of the “Old Mammoth” townsite north of Old Mammoth Road.

Archaeological Site CA-MNO-893H (The Bodle Ditch)

The Bodle ditch system was constructed in 1879. Originating at Coldwater Creek above Lake Mary, the ditch supplied water and power to Mill City for both mining and domestic use. A side ditch was used to irrigate pasture in the meadow in the southern portion of CA-MNO-3. The meadow supplied feed for both local cattle destined for Mill City and Mammoth City, and large herds en route to Reno from the Owens Valley. Later, dairy cows and sheep grazed on Windy Flat. The Bodle Ditch was recorded by the U.S. Forest Service in the 1970s. Water rights of Bodle Ditch were purchased by the Mammoth County Water District in the 1980s and irrigation was discontinued. In the 1990s the California State Historic Preservation Office found the Bodle Ditch to be not eligible for the National Register of Historic Places. There is no indication that the determination of eligibility was finalized, however, and the portion of the

ditch within the Project site was transferred out of federal ownership. A ditch and pipeline associated with the historic component of the CA-MNO-3 site was identified, however, it is located outside of the current Project area.

Location

Bodle ditch is located in the southwest portion of the Project site.

Native American Consultation SB-18 Tribal Consultation

Pursuant to Government Code §65352.3 and Senate Bill (SB) 18, the Town of Mammoth Lakes (Town) contacted the California Native American Heritage Commission (NAHC) on April 6, 2006 to request a Tribal Consultation List with contact information for the tribes identified by the NAHC as having traditional lands or cultural resources within the Project vicinity.

The NAHC responded on October 25, 2006 with a list of four tribal entities:

- Benton Paiute Reservation;
- Bridgeport Paiute Indian Colony;
- Mono Lake Indian Community; and
- Antelope Valley Paiute Tribe

The Town sent consultation letters to each of the four NAHC-listed tribal entities on November 2, 2006, inviting each group to consult with them directly regarding the potential for the presence of Native American cultural resources that may be impacted by the Project. Three of the NAHC-listed tribal entities received consultation letters from the Town on November 7, 2007. The Antelope Valley Paiute Tribe letter was unclaimed and returned to the Town on December 7, 2006. The Town left voicemails with the Antelope Valley Paiute Tribe to inform them of the Project, but the voicemails were not returned. The Bridgeport Paiute Indian Colony, who stated they have no interest in the Project site, is the only tribe that has responded to date.¹

¹ Letter received from Charlotte Baker, Chairperson Bridgeport Paiute Indian Colony to Jen Daugherty, Assistant Planner, December 12, 2006.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

Based on Appendix G of the *CEQA Guidelines*, a project would have a significant impact on cultural resources if the project would:

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

For purposes of CEQA, to determine whether cultural resources could be significantly affected, the significance of the resource itself must first be determined. Section 15065 of the *CEQA Guidelines* mandates a finding of significance if a project would eliminate important examples of major periods of California history or prehistory.

In addition, pursuant to Section 15064.5 of the *CEQA Guidelines*, a project could have a significant effect on the environment if it “may cause a substantial adverse change in the significance of an historical resource.” A “substantial adverse change” means “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource is impaired.” Material impairment means altering “...in an adverse manner those characteristics of an historical resource that convey its historical significance and its eligibility for inclusion in the California Register of Historical Resources.” Impacts to those cultural resources not determined to be significant according to the significance criteria described above are not considered significant for the purposes of CEQA.

Historical Resources

Pursuant to Section 15064.5 of the *CEQA Guidelines*, a historical resource (including both built environment and prehistoric archaeological resources) is presumed significant if the resource is listed on the California Register of Historical Resources (CRHR) or has been determined to be eligible for listing by the State Historical Resources Commission. A historical resource may also be considered significant if the lead agency determines, based on substantial evidence, that the resource meets the criteria for inclusion in the CRHR. The criteria are as follows:

1. The resource is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. The resource is associated with lives of persons important in our past;
3. The resource embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. The resource has yielded, or may be likely to yield, information important in prehistory or history.

Unique Archaeological Resources

Pursuant to Section 15064.5 of the *CEQA Guidelines*, archaeological resources, not otherwise determined to be historical resources, may be significant if they are unique. Pursuant to Public Resources Code Section 21083.2, a unique archaeological resource is defined 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 one of the following criteria:

1. The resource contains information needed to answer important scientific questions and there is a demonstrable public interest in that information;
2. The resource has a special and particular quality, such as being the oldest of its type or the best available example of its type; or
3. The resource is directly associated with a scientifically recognized important prehistoric or historic event or person.

A non-unique archaeological resource means an archaeological artifact, object, or site that does not meet the above criteria. Non-unique archaeological resources receive no further consideration under CEQA.

Human Remains

According to Section 15064.5 of the *CEQA Guidelines*, all human remains are a significant resource. Section 15064.5 of the *CEQA Guidelines* also assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. These procedures are spelled out under Public Resources Code Section 5097.

Paleontological Resources

According to Appendix G of the *CEQA Guidelines*, a project could have a significant effect if it would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Project Impacts and Mitigation Measures

The Project would require grading of the topographic features of the Project site to the extent necessary for construction of the Project. As such, the Project may have the potential to impact cultural resources (including historical, archaeological, and paleontological resources, as well as human remains) that are either known to exist within the Project site or have potential to be buried within the site. Following is a discussion of potential Project impacts to known and unknown cultural resources.

Impact CULT-1 Impacts to Known Cultural Resources

Part of the Project site had been public land administered by the Inyo National Forest before a land exchange put it into private ownership. As noted, nine surveys were undertaken when the area was public land administered by the Inyo National Forest.

As discussed in the “Environmental Setting” above, the Project site and immediate vicinity have been subjected to multiple cultural resources studies. Two known resources, CA-MNO-3, which includes remnants of the “Old Mammoth” townsite, and CA-MNO-893H, the Bodle Ditch, are located within the Project site. Following is a discussion of the Project’s impacts with respect to these known previously recorded cultural resources.

CA-MNO-3

The Project has the potential to impact CA-MNO-3 south of Old Mammoth Road. According to Archaeological Test Excavations (1990), the impacts to CA-MNO-3 from construction of the golf course were adequately mitigated through the testing as reported and the protection of the site with non-cultural fill. Because the site was capped with non-cultural fill, it is unlikely that the minor, Project-related changes to the golf course at the ground surface will impact the site. As such, any project-related impacts associated with alterations to the golf course to Site CA-MNO-3 would be considered ***less than significant*** under CEQA.

The Project has the potential to impact the significant prehistoric and historic components of CA-MNO-3 north of Old Mammoth Road. The portion of this site that includes the “Old Mammoth” townsite is also considered significant because it meets criterion 1 and 4 of the California Register criteria for its association with events important to regional history. Therefore, Project-related impacts to Site CA-MNO-3 in this area would be considered potentially **significant** under CEQA. As such, mitigation measures are recommended below that would reduce any such impacts to cultural resources to a less-than-significant level.

CA-MNO-893H, The Bodle Ditch

The Bodle Ditch system was determined not eligible for the National Register of Historic Places by the California State Historic Preservation Officer. No distinguishing characteristics that would suggest the revision of this determination were identified. Additionally, the portions of the pipeline and ditch identified outside of the Project area that are associated with the historic component of the CA-MNO-3 site is consistent with this determination. Therefore, the site would not have sufficient significance to be eligible for the California Register of Historical Resources. As such, any project-related impacts to the Bodle Ditch would be considered **less than significant** under CEQA.

Mitigation Measure CULT-1

For the portion of CA-MNO-3 located north of Old Mammoth Road the applicant shall implement any of the following measures to reduce the significant impact to a less than significant level:

- plan construction to avoid the site,
- deed conservation easements,
- cap the site prior to construction, or
- perform archaeological data recovery.

Impact CULT-2 Impacts to Unknown Cultural Resources

Portions of the Project site north of Old Mammoth Road are sensitive for prehistoric and historic archaeological resources, and human remains. Buried (previously unrecorded) prehistoric and historic archaeological deposits may be present within the Project site. In addition, previously unidentified features and/or diagnostic artifacts within previously recorded sites may be present within the Project site. Ground-disturbing construction associated with the Project has the potential to result in **significant** impacts to unknown cultural resources. As such, mitigation measures are recommended below that would reduce any such impacts to unknown cultural resources to a less-than-significant level.

Mitigation Measure CULT-2a

A Mitigation Monitoring and Reporting Plan (MMRP) shall be prepared by a qualified archaeologist prior to Project construction for the portion of the Project site north of Old Mammoth Road. The MMRP shall outline the protocol for notification, temporary protection, documentation, and evaluation of previously unrecorded cultural resources encountered during construction, as well as mitigation of project-related impacts to any such resources that are considered significant under CEQA, and the curation of any artifacts or samples collected in the field. The MMRP shall include a sample data recovery plan and a curation agreement. This document shall be completed prior to commencement of any ground-disturbing activity associated with the Project site (including clearing, brushing, grubbing, vegetation removal, disking, grading, trenching, excavation, and/or boring).

Mitigation Measure CULT-2b

A qualified archaeologist shall monitor all ground-disturbing construction in native soils for the portion of the Project site north of Old Mammoth Road. (Construction work within stockpile material does not require monitoring.) The construction monitor shall be supplied with maps and site records for the previously recorded cultural resources within the Project site, so that she/he can distinguish new resources from those that have been previously recorded and evaluated. The monitor shall prepare a daily monitoring log recording the type of work monitored, soil conditions, discoveries, and general observations.

Mitigation Measure CULT-2c

Previously unknown cultural resources identified during Project construction shall be protected through temporary redirection of work and possibly other methods such as fencing (to be outlined in the MMRP) until formally evaluated for significance under CEQA. In the event that previously unrecorded cultural resources are exposed during construction, the monitor shall be empowered to temporarily halt construction in the immediate vicinity of the discovery while it is documented and evaluated for significance. Construction activities may continue in other areas. If the discovery is evaluated as significant under CEQA, additional work such as data recovery excavation may be warranted to mitigate project-related impacts to a less-than-significant level.

Mitigation Measure CULT-2d

Procedures of conduct following the discovery of human remains have been mandated by Health and Safety Code §7050.5, Public Resources Code §5097.98 and the California Code of Regulations §15064.5(e) (CEQA). According to the provisions in CEQA, if human remains are encountered at the site, all work in the immediate vicinity of the discovery shall cease and necessary steps to ensure the integrity of the immediate area shall be taken. The Mono County Coroner shall be notified immediately. The Coroner shall then determine whether the remains are Native American. If the Coroner determines the remains are Native American, the Coroner shall notify the NAHC within 24 hours, who will, in turn,

notify the person the NAHC identifies as the most likely descendent (MLD) of any human remains. Further actions shall be determined, in part, by the desires of the MLD. The MLD has 24 hours to make recommendations regarding the disposition of the remains following notification from the NAHC of the discovery. If the MLD does not make recommendations within 24 hours, the owner shall, with appropriate dignity, re-intern the remains in an area of the property secure from further disturbance. Alternatively, if the owner does not accept the MLD's recommendations, the owner or the descendent may request mediation by the NAHC.

Mitigation Measure CULT-2e

A monitoring report shall be prepared upon completion of construction monitoring, summarizing the results of the monitoring effort. Site records for any newly recorded or updated cultural resources shall be appended to the monitoring report.

Mitigation Measure CULT-2f

Artifacts or samples collected during the course of construction monitoring and any testing or data recovery associated with newly discovered resources shall be curated in perpetuity in an appropriate facility upon completion of analysis and processing.

CUMULATIVE IMPACTS

Impact CULT-3

Implementation of the Project in combination with the related projects would result in the development of additional low- to high-density residential, commercial, institutional, public resort, and industrial land uses. Impacts to cultural resources (including historic, archaeological, and paleontological resources, as well as human remains) tend to be site-specific and are assessed on a site-by-site basis. The extent of the cultural resources (if any) that occur at the related project sites is generally unknown and, as such, it is not known whether any of the related projects would result in significant impacts to cultural resources. However, similar to the Project, such determinations would be made on a case-by-case basis and, if necessary, the applicants of the related projects would be required to implement the appropriate mitigation measures. Furthermore, the analysis of the Project's impacts to cultural resources concluded that, through the implementation of the mitigation measures recommended above, project-related impacts to cultural resources would be less than significant. Therefore, the Project would not contribute to any potential cumulative impacts, and cumulative impacts to cultural resources would be ***less than significant*** and no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

With the implementation of the mitigation measures recommended above, the Project's impacts to cultural resources would be reduced to ***less-than-significant*** levels.