

## 4.4 Cultural and Paleontological Resources

### 4.4.1 Methods and Significance Criteria

#### Methods

No new fieldwork was conducted for the preparation of this EIS/EIR.

#### Cultural Resources

Impacts on cultural resources were assessed on the basis of the proposed action and alternatives and review of applicable documents, such as the *Placer County General Plan* and *City of Lincoln General Plan*. Effects on cultural resources were analyzed qualitatively on a large-scale level, based on the judgment of qualified cultural resources professionals.

Anticipated changes in land cover/land use for each alternative are described in Chapter 2, *Proposed Action and Alternatives*. See Section 4.0, *Environmental Consequences*, for a description of the methodology used across all resource chapters for the analysis of cumulative effects.

Generally, the alternatives would have similar direct impacts on cultural resources because all alternatives would serve to streamline development and ground disturbance envisioned by the Permit Applicants' long-term plans such as the *Placer County General Plan* (Placer County 1994) and the *City of Lincoln General Plan* (City of Lincoln 2008a). The development activities contemplated in these plans could have substantial temporary and permanent impacts on cultural resources.

It is assumed that all Covered Activities would be consistent with the policies of the Permit Applicants' general plans and other long-term plans and that the Permit Applicants would comply with the requirements for identification of cultural resources, assessment of impacts, and treatment for affected resources outlined in the Cultural Resources Management Plan (CRMP) prepared for the PCCP (Westwood 2016).

In accordance with the CRMP, efforts pertaining to the identification and evaluation of cultural resources and the resolution of potential impacts on such resources under individual projects (Covered Activities) may include such methods as records searches conducted at the California Historical Resources Information System's (CHRIS's) North Central Information Center, archaeological pedestrian surveys, built environment research and assessments, recordation of archaeological sites and built environment resources, subsurface archaeological testing, and evaluation and mitigation of cultural resources that may be affected by the projects. In addition to adhering to the CRMP, actions of the PCCP that would require a Section 404 permit from the U.S. Army Corps of Engineers are subject to review pursuant to Section 106 of the National Historic Preservation Act; accordingly cultural resource studies would be conducted in accordance with Section 106 regulations (36 Code of Federal Regulations [CFR] Part 800).

#### Paleontological Resources

Impacts related to paleontological resources were assessed on the basis of the proposed PCCP and review of applicable documents such as the *Placer County General Plan* and *City of Lincoln General Plan*.

The primary source of information used in developing the paleontological resources analysis is the paleontological database at the University of California, Berkeley. Effects on paleontological resources were analyzed qualitatively on a large scale, based on professional judgment and the Society of Vertebrate Paleontology (SVP) guidelines below.

*SVP's Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources* provides standard guidelines that are widely followed (Society of Vertebrate Paleontology 2010). These guidelines reflect the accepted standard of care for paleontological resources. The SVP guidelines identify two key phases for protecting paleontological resources from project impacts.

- Assess the likelihood that the area contains significant nonrenewable paleontological resources that could be directly or indirectly affected, damaged, or destroyed as a result of the project.
- Formulate and implement measures to mitigate potential adverse impacts.

An important strength of SVP's approach to assessing potential impacts on paleontological resources is that the SVP guidelines provide some standardization in evaluating paleontological sensitivity. Table 3.4-1 in Section 3.4 of Chapter 3, *Affected Environment*, defines the SVP's sensitivity categories for paleontological resources and summarizes SVP's recommended treatments to avoid adverse effects in each sensitivity category.

## Significance Criteria

NEPA establishes the federal policy of preserving important historic, cultural, and natural aspects of our national heritage during federal project planning. All federal or federally assisted projects requiring action pursuant to NEPA Section 102 must take into account impacts on cultural resources (42 United States Code Sections 4321–4347). NEPA analysis should identify the potential for an action to adversely affect resources that are listed or may be eligible for listing in the National Register of Historic Places (NRHP). Because NEPA does not have regulations that establish impacts thresholds for cultural resources in particular, the National Historic Preservation Act Section 106 criteria for adverse effect are typically used to identify adverse effects under NEPA.

The Section 106 criteria of adverse effect state that projects that would have an adverse effect on historic properties are those that would alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association (36 CFR 800.5[a][1]). For the purposes of this analysis, "alteration of qualifying characteristics" may include but is not necessarily limited to the following.

- Physical destruction of all or part of a property.
- Alteration of built-environment resources that is not consistent with the federal standards for treatment of historic properties (36 CFR 68).
- Removal of a property from its historical location.
- Alteration of the significant features of a property or introduction of incongruous elements to the setting.
- For federally owned properties, transfer of the property out of federal control without adequate and legally enforceable mechanisms to ensure preservation.
- Neglect of a property that results in deterioration (36 CFR 800.5[a][2]).

According to Appendix G of the State CEQA Guidelines, a proposed project would be considered to have a significant effect under CEQA if it would result in any of the following.

- A substantial adverse change in the significance of a historical resource as defined in Section 15064.5.
- A substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.
- Disturbance of any human remains, including those interred outside of dedicated cemeteries.
- Direct or indirect destruction of a unique paleontological resource or site or unique geologic feature.

## 4.4.2 Impacts and Mitigation Measures

### Alternative 1—No Action

**Impact CUL-1: Potential to cause alteration of characteristics of known or unknown cultural resources that may qualify such resources for listing in the NRHP (NEPA) or CRHR (CEQA) (NEPA: significant and unavoidable; CEQA: significant and unavoidable)**

Public and private development envisioned in the *Placer County General Plan* and the *City of Lincoln General Plan*, as well as South Placer Regional Transportation Authority (SPRTA) and Placer County Water Agency (PCWA) projects, would go forward under the no action alternative. For example, the general plans for Placer County and the City of Lincoln include activities associated with potential future growth, conservation and rural development, regional public programs, conservation programs, and in-stream programs that, if carried out, could affect cultural resources, including archaeological resources through ground-disturbing activities. The EIR for the *City of Lincoln General Plan* found that the effects on cultural resources of growth associated with the general plans would be less than significant with implementation of the policies of the plans, as described below (City of Lincoln 2008b). The EIR for the *Placer County General Plan* found that the effects on cultural resources of growth associated with the general plan would be potentially significant even with implementation of the policies of those plans, as described below (Placer County 1994). PCWA projects involve construction, operation, and maintenance of PCWA canals and new pipelines; SPRTA projects involve construction, maintenance, and repair of roads and bridges.

Although implementation of the activities identified in the Placer County and the City of Lincoln general plans could result in the loss of important previously identified and unknown cultural resources, projects subject to federal jurisdiction would be required to comply with Section 106 and projects subject to CEQA review would require compliance with the cultural resources regulations contained in CEQA, all on a project-by-project basis. In addition, for CEQA projects where the County is the lead agency, the cultural resources policies and actions outlined in Section 7.2 of the *Placer County General Plan* would be implemented. For projects where the City of Lincoln is the lead agency, Goals LU-2 and LU-3 and Goal OSC-6 of the *City of Lincoln General Plan* would be implemented. Following these guidelines would reduce potential impacts on cultural resources, but the impacts identified in the EIR for the *Placer County General Plan* would not be reduced to a less-than-significant level.

**NEPA Determination:** Impacts on known or unknown cultural resources could result from implementation of agency plans and projects—specifically, implementation of the general plans for Placer County and the City of Lincoln. Projects subject to federal jurisdiction would be required to comply with Section 106 on a project-by-project basis. Compliance with federal, state, and local regulations would reduce potential alterations, but not to a less-than-significant level. Therefore, the effect would be significant and unavoidable.

**CEQA Determination:** Impacts on known or unknown cultural resources could result from implementation of agency plans and projects—specifically, implementation of general plans for Placer County and the City of Lincoln. Projects subject to CEQA review would require compliance with the CEQA cultural resource regulations on a project-by-project basis. Compliance with federal, state, and local regulations would reduce potential alterations, but not to a less-than-significant level. Therefore, the effect would be significant and unavoidable.

**Impact CUL-2: Disturbance of any human remains, including those interred outside of dedicated cemeteries (NEPA: less than significant; CEQA: less than significant)**

Public and private development envisioned in the *Placer County General Plan* and the *City of Lincoln General Plan*, as well as SPRTA and PCWA projects, would go forward under the no action alternative. For example, the general plans for Placer County and the City of Lincoln include activities associated with potential future growth, conservation and rural development, regional public programs, conservation programs, and in-stream programs that, if carried out, could disturb human remains through ground-disturbing activities. The EIRs for the *Placer County General Plan* and *City of Lincoln General Plan* found that the effects on cultural resources of growth associated with the general plans would be less than significant with implementation of the policies of those plans, as described below.

Although implementation of the activities identified in the Placer County and the City of Lincoln general plans could result in the disturbance of human remains, projects subject to federal jurisdiction would be required to comply with Section 106 and projects subject to CEQA review would require compliance with the cultural resources regulations contained in CEQA, all on a project-by-project basis. In addition, projects would have to comply with state and local laws and regulations regarding the treatment of human remains, including California Health and Safety Code 7050.5, State CEQA Guidelines (Section 15064.5), and Public Resources Code Section 5097.98. By following these laws and guidelines, and by complying with Section 106 and CEQA, the potential disturbance of human remains would be reduced to a less-than-significant level.

**NEPA Determination:** Implementation of agency plans and projects, including implementation of general plans for Placer County and the City of Lincoln, may affect human remains. Projects subject to federal jurisdiction would be required to comply with Section 106 regarding the treatment of human remains. Compliance with federal, state, and local regulations would reduce disturbance of human remains to levels that are less than significant. Therefore, the effect would be less than significant.

**CEQA Determination:** Implementation of agency plans and projects, including implementation of general plans for Placer County and the City of Lincoln, may affect human remains. Projects subject to CEQA review would require compliance with CEQA cultural resource regulations on a project-by-project basis and with state and local laws and regulations regarding the treatment of human remains. Compliance with federal, state, and local regulations would reduce disturbance of human remains to levels that are less than significant. Therefore, the effect would be less than significant.

**Impact CUL-3: Direct or indirect destruction of a unique paleontological resource or site or unique geologic feature (NEPA: significant and unavoidable; CEQA: significant and unavoidable)**

Under Alternative 1, the conservation measures would not be implemented, and there would be no ground disturbance as a result of the PCCP. However, several geologic units in the Plan Area are sensitive for paleontological resources, and if fossils are present, they could be damaged during ground-disturbing activities resulting from implementation of the general plans for Placer County and the City of Lincoln and SPRTA and PCWA projects. Compliance with the general plans would afford some protection to paleontological resources during ground-disturbing activities in potentially sensitive areas; however, the EIR for the *Placer County General Plan* found that these protections would not reduce potential impacts to a less-than-significant level. Therefore, the effect would be significant and unavoidable.

**NEPA Determination:** Implementation of general plans for Placer County and the City of Lincoln and SPRTA and PCWA projects may affect paleontological resources. Compliance with the general plans would afford some protection to paleontological resources during ground-disturbing activities in potentially sensitive areas; however, the EIR for the *Placer County General Plan* found that these protections would not reduce potential impacts to a less-than-significant level. Therefore, the effect would be significant and unavoidable.

**CEQA Determination:** General plans for Placer County and the City of Lincoln and SPRTA and PCWA projects may affect paleontological resources. Compliance with the general plans would afford some protection to paleontological resources during ground-disturbing activities in potentially sensitive areas; however, the EIR for the *Placer County General Plan* found that these protections would not reduce potential impacts to a less-than-significant level. Therefore, the effect would be significant and unavoidable.

**Alternative 2—Proposed Action****Impact CUL-1: Potential to cause alteration of characteristics of known or unknown cultural resources that may qualify such resources for listing in the NRHP (NEPA) or CRHR (CEQA) (NEPA: significant and unavoidable; CEQA: significant and unavoidable)**

Implementation of the activities identified in the Placer County and City of Lincoln general plans could result in the loss of important previously identified and unknown cultural resources. For CEQA projects where the County is the lead agency, the cultural resources policies and actions outlined in Section 7.2 of the *Placer County General Plan* would be implemented. For projects where the City of Lincoln is the lead agency, Goals LU-2 and LU-3 and Goal OSC-6 of the *City of Lincoln General Plan* would be implemented. Following these guidelines would reduce potential impacts on cultural resources, but the impacts identified in the EIR for the *Placer County General Plan* would not be reduced to a less-than-significant level. Accordingly, such impacts would be considered significant and unavoidable.

Impacts on historical resources (CEQA) or historic properties (NEPA) could result from implementation of proposed PCCP conservation measures that require construction activities, such as earthmoving, re-contouring, excavation, or removal or modification of landscape features or structures. These construction activities have the potential to result in a significant impact on historical resources and historic properties. Some physical actions required to implement Conservation Measure (CM) 2 and CM3 (Table 2-13 in Chapter 2, *Proposed Action and Alternatives*)

involve ground disturbance and modifications to the built environment. For example, removal or modification of fences, ditches, trails, concrete dams, and roads listed in CM2 could cause a substantial adverse change to NRHP- or California Register of Historical Resources (CRHR)-eligible built environment resources by impairing the character-defining features of such resources and reducing or eliminating their ability to convey their historical significance. Ground-disturbing activities that extend below the surface, such as restoration or creation of vernal pool complexes, construction of drainage ditches, mechanical re-contouring of hydrological features and disking of vegetation listed in CM2 and CM3, could cause significant damage to intact subsurface archaeological deposits and reduce or eliminate their ability to yield important data, thus causing a substantial adverse change to NRHP- or CRHR-eligible archaeological resources. General plan policies and standard agency measures would reduce the levels of effects.

Implementation of the PCCP conservation measures could result in impacts including the loss of important previously identified and unknown historical resources. However, a CRMP (Westwood 2016) has been developed for the PCCP that would reduce the potential impacts on cultural resources to a less-than-significant level. The CRMP identifies the procedures and standards that would be used to evaluate and address the potential impacts on cultural resources that may result from projects and activities permitted under the PCCP. These standards and procedures would ensure that the individual projects are compliant with all federal, state, and local laws and regulations as they relate to cultural resources. Furthermore, the CRMP identifies the appropriate treatment for resources that would be significantly affected and provides guidance for developing resource-specific treatments. Standard treatment measures include capping of sites; data recovery excavation; project-specific public interpretation and education; construction monitoring; tribal access agreements; and Historic American Building Survey (HABS), Historic American Engineering Record (HAER), and Historic American Landscape Survey (HALS) programs.

**NEPA Determination:** Ground-disturbing activities or modifications to built resources associated with implementation of PCCP conservation measures under Alternative 2, the proposed action, could result in impacts on cultural resources. These activities and modifications could alter or destroy the characteristics of known or unknown cultural resources that may qualify for listing in the NRHP. Construction and O&M activities associated with Covered Activities could also affect cultural resources. However, identification procedures and treatment measures set forth in the PCCP CRMP, general plan policies, and standard agency measures are expected to reduce potential alterations to levels that are less than significant. Therefore, the impact would be less than significant.

Implementation of the local jurisdictions' general plans would be required to comply with Section 106 on a project-by-project basis for projects with a federal nexus. Compliance with federal, state, and local regulations would reduce potential impacts associated with these projects, but not to a less-than-significant level. Therefore, because the impacts associated with general plan implementation would be significant and unavoidable, the overall impact would also be significant and unavoidable.

**CEQA Determination:** Ground-disturbing activities or modifications to built resource associated with PCCP implementation under Alternative 2, the proposed action, could result in impacts on cultural resources. These activities or modifications could impair the characteristics of known or unknown cultural resources that may qualify them for inclusion in the CRHR. Construction and O&M activities associated with Covered Activities could also affect cultural resources. However, identification procedures and treatment measures set forth in the PCCP CRMP, general plan policies,

and standard agency measures are expected to reduce potential alterations to levels that are less than significant. Therefore, the impact would be less than significant.

Implementation of the local jurisdictions' general plans would be required to comply with Section 106 and Assembly Bill (AB) 52 on a project-by-project basis. Compliance with federal, state, and local regulations would reduce potential impacts associated with these projects, but not to a less-than-significant level. Therefore, because the impacts associated with general plan implementation would be significant and unavoidable, the overall impact would also be significant and unavoidable.

**Impact CUL-2: Disturbance of any human remains, including those interred outside of dedicated cemeteries (NEPA: less than significant; CEQA: less than significant)**

Activities under Alternative 2, the proposed action, have the potential to disturb known or unknown human remains. Disturbance of human remains under this alternative would most likely occur during ground-disturbing activities. The locations of known human remains are often obtained from government documents, archival data, oral histories, tribal consultation, or CHRIS data regarding previously recorded cultural resources or previous cultural resources studies. Unknown human remains are typically identified during archaeological construction monitoring, field surveys, testing, or data recovery.

Although the *Placer County General Plan* does not directly address impacts or procedures for the discovery or avoidance of human remains, policies and actions outlined in Section 7.2 (Goals 5.A and 5.D) provide guidance for avoidance and identification of cultural resources that may contain human remains. The *City of Lincoln General Plan* provides guidance (Policy OSC-6.10) for the discovery and treatment of human remains that comply with state and local laws and guidelines, including California Health and Safety Code 7050.5, State CEQA Guidelines (Section 15064.5), and Public Resources Code Section 5097.98. In addition, a CRMP developed for the PCCP would reduce the potential impacts on cultural resources and human remains to a less-than-significant level. The CRMP identifies the procedures and standards that would be used to evaluate and address the potential impacts on cultural resources that may result from projects and activities permitted under the PCCP. The EIRs for the *Placer County General Plan* and *City of Lincoln General Plan* found that the effects of growth associated with the general plans on cultural resources would be less than significant with implementation of the policies of those plans (Placer County 1994; City of Lincoln 2008b).

By following the laws and guidelines identified in the *City of Lincoln General Plan*, the *Placer County General Plan*, and the CRMP, the potential disturbance of human remains would be reduced to a less-than-significant level.

**NEPA Determination:** Ground-disturbing activities associated with PCCP conservation measures under Alternative 2, the proposed action, could disturb known or unknown human remains. However, CRMP policies and measures are expected to reduce the disturbance of human remains to levels that are less than significant. Ground-disturbing activities associated with Covered Activities could also disturb human remains. Projects subject to federal jurisdiction would be required to comply with Section 106 regarding the treatment of human remains. Compliance with federal, state, and local regulations would reduce disturbance of human remains resulting from Covered Activities to levels that are below significant. Therefore, the impact would be less than significant.

**CEQA Determination:** Ground-disturbing activities associated with PCCP conservation measures under Alternative 2, the proposed action, could disturb known or unknown human remains. However, CRMP policies and measures are expected to reduce the disturbance of human remains to levels that are less than significant. Ground-disturbing activities associated with Covered Activities could also disturb human remains. Projects subject to CEQA review would require compliance with the CEQA cultural resources regulations on a project-by-project basis and with state and local laws and regulations regarding the treatment of human remains. Compliance with federal, state, and local regulations would reduce disturbance to human remains to levels that are less than significant. Therefore, the impact would be less than significant. No mitigation has been identified.

**Impact CUL-3: Direct or indirect destruction of a unique paleontological resource or site or unique geologic feature (NEPA: significant and unavoidable; CEQA: significant and unavoidable)**

Several geologic units in the Plan Area are sensitive for paleontological resources, and fossils could be present. If fossils are present, they could be damaged during ground-disturbing activities. Most ground-disturbing activities associated with PCCP conservation measures would be related to CM3, which would involve grading to restore or create vernal pool and grassland habitat. Many of the areas designated as potential restoration areas are directly underlain by geologic units sensitive for paleontological resources (Table 3.4-2 and Figure 3.4-1). Excavations deeper than 3 feet in these units could damage paleontological resources. Substantial damage to or destruction of significant paleontological resources as defined by the SVP (Society of Vertebrate Paleontology 2010) would be a significant impact. Ground-disturbing activities related to construction resulting from implementation of general plans for Placer County and the City of Lincoln and implementation of SPRTA and PCWA projects also could damage paleontological resources. Compliance with the general plans would afford some protection to paleontological resources during ground-disturbing activities in potentially sensitive areas; however, the EIR for the *Placer County General Plan* found that these protections would not reduce potential impacts to a less-than-significant level. Therefore, the effect would be significant and unavoidable.

Similar impacts could result from construction activities associated with implementation of PCCP conservation measures; however, the PCA would implement Mitigation Measures CUL-1 and CUL-2 in the course of establishing the Reserve System. Implementation of Mitigation Measures CUL-1 and CUL-2 would reduce these impacts to a less-than-significant level.

**NEPA Determination:** Under Alternative 2, the proposed action, ground-disturbing activities associated with PCCP conservation measures and the Covered Activities have the potential to disturb potentially significant paleontological resources if the activities occur in geologic units that are sensitive for these resources. Compliance with the general plans would afford some protection to paleontological resources during ground-disturbing activities in potentially sensitive areas; however, the EIR for the *Placer County General Plan* found that these protections would not reduce potential impacts to a less-than-significant level. Therefore, the effect would be significant and unavoidable. While implementation of Mitigation Measures CUL-1 and CUL-2 would reduce the impacts of activities associated with implementation of PCCP conservation measures to a less-than-significant level, the overall impact would remain significant and unavoidable.

**CEQA Determination:** Under Alternative 2, the proposed action, ground-disturbing activities associated with PCCP conservation measures and the Covered Activities have the potential to disturb potentially significant paleontological resources if the activities occur in geologic units that

are sensitive for these resources. Compliance with the general plans would afford some protection to paleontological resources during ground-disturbing activities in potentially sensitive areas; however, the EIR for the *Placer County General Plan* found that these protections would not reduce potential impacts to a less-than-significant level. Therefore, the effect would be significant and unavoidable. While implementation of Mitigation Measures CUL-1 and CUL-2 would reduce the impacts of activities associated with implementation of PCCP conservation measures to a less-than-significant level, the overall impact would remain significant and unavoidable.

**Mitigation Measure CUL-1: Retain a qualified professional paleontologist to monitor significant ground-disturbing activities**

When excavation deeper than 3 feet will occur in geologic units sensitive for paleontological resources (Table 3.4-2, Figure 3.4-1), a qualified paleontologist will be present during excavation. Prior to these ground-disturbing activities, the professional paleontologist, as defined by SVP's *Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources* (2010), will be retained. Data gathered during detailed project design will be used to determine the activities that will require the presence of the paleontologist. Recovered fossils will be prepared so that they can be properly documented. Recovered fossils will then be curated at a facility that will properly house and label them, maintain the association between the fossils and field data about the fossils' provenance, and make the information available to the scientific community.

**Mitigation Measure CUL-2: Stop work if substantial fossil remains are encountered during construction**

If substantial fossil remains (particularly vertebrate remains) are discovered during ground-disturbing activities, the construction contractor will stop activities immediately until a state-registered professional geologist or qualified professional paleontologist can assess the nature and importance of the find and a qualified professional paleontologist can recommend appropriate treatment. Treatment may include preparation and recovery of fossil materials so that they can be housed in an appropriate museum or university collection and may also include preparation of a report for publication describing the finds.

### **Alternative 3—Reduced Take/Reduced Fill**

**Impact CUL-1: Potential to cause alteration of characteristics of known or unknown cultural resources that may qualify such resources for listing in the NRHP (NEPA) or CRHR (CEQA) (NEPA: significant and unavoidable; CEQA: significant and unavoidable)**

Impacts of implementing Alternative 3 would be similar to or slightly less than those identified for CUL-1 under Alternative 2, the proposed action, because the acreage for potential restoration areas would likely be slightly smaller due to the reduced conversion of vernal pool complex under Alternative 3. Public and private development envisioned in the *Placer County General Plan* and the *City of Lincoln General Plan*, as well as SPRTA and PCWA projects, would go forward and would have the same impact under Alternative 3 as under Alternative 2.

Implementation of the activities identified in the Placer County and the City of Lincoln general plans could result in the loss of important previously identified and unknown cultural resources. For CEQA projects where the County is the lead agency, the cultural resources policies and actions

outlined in Section 7.2 of the *Placer County General Plan* would be implemented. For projects where the City of Lincoln is the lead agency, Goals LU-2 and LU-3 and Goal OSC-6 of the *City of Lincoln General Plan* would be implemented. Following these guidelines would reduce potential impacts on cultural resources, but the impacts identified in the EIR for the *Placer County General Plan* would not be reduced to a less-than-significant level. Accordingly, such impacts would be considered significant and unavoidable.

Impacts on historical resources (CEQA) or historic properties (NEPA) could result from implementation of proposed PCCP conservation measures that require construction activities, such as earthmoving, re-contouring, excavation, or removal or modification of landscape features or structures. These construction activities have the potential to result in significant impacts on historical resources and historic properties. Some physical actions required to implement Conservation Measure (CM) 2 and CM3 (Table 2-13 in Chapter 2, *Proposed Action and Alternatives*) involve ground disturbance and modifications to the built environment. For example, removal or modification of fences, ditches, trails, concrete dams, and roads listed in CM2 could cause a substantial adverse change to NRHP- or California Register of Historical Resources (CRHR)-eligible built environment resources by impairing the character-defining features of such resources and reducing or eliminating their ability to convey their historical significance. Ground-disturbing activities that extend below the surface, such as restoration or creation of vernal pool complexes, construction of drainage ditches, mechanical re-contouring of hydrological features and disking of vegetation listed in CM2 and CM3, could cause significant damage to intact subsurface archaeological deposits and reduce or eliminate their ability to yield important data, thus causing a substantial adverse change to NRHP- or CRHR-eligible archaeological resources. General plan policies and standard agency measures would reduce the levels of effects.

Implementation of the Covered Activities under the proposed PCCP could result in impacts, including the loss of important previously identified and unknown historical resources. However, a CRMP (Westwood 2016) has been developed for the PCCP that would reduce the potential impacts on cultural resources to a less-than-significant level. The CRMP identifies the procedures and standards that would be used to evaluate and address the potential impacts on cultural resources that may result from projects and activities permitted under the PCCP. These standards and procedures would ensure that the individual projects are compliant with all federal, state, and local laws and regulations as they relate to cultural resources. Furthermore, the CRMP identifies the appropriate treatment for resources that would be significantly affected and provides guidance for developing resource-specific treatments. Standard treatment measures include capping of sites; data recovery excavation; project-specific public interpretation and education; construction monitoring; tribal access agreements; and Historic American Building Survey (HABS), Historic American Engineering Record (HAER), and Historic American Landscape Survey (HALS) programs.

**NEPA Determination:** Ground-disturbing activities or modifications to built resources associated with PCCP implementation under Alternative 3 could result in impacts on cultural resources. These activities and modifications could alter or destroy the characteristics of known or unknown cultural resources that may qualify for listing in the NRHP. Construction and O&M activities associated with Covered Activities could also affect cultural resources. However, identification procedures and treatment measures set forth in the PCCP CRMP, general plan policies, and standard agency measures are expected to reduce potential alterations to levels that are less than significant. Therefore, the impact would be less than significant.

Implementation of the local jurisdictions' general plans would be required to comply with Section 106 on a project-by-project basis. Compliance with federal, state, and local regulations would reduce potential impacts associated with these projects, but not to a less-than-significant level. Therefore, because the impacts associated with general plan implementation would be significant and unavoidable, the overall impact would also be significant and unavoidable.

**CEQA Determination:** Ground-disturbing activities or modifications to built resource associated with PCCP implementation under Alternative 3 could result in impacts on cultural resources. These activities or modifications could impair the characteristics of known or unknown cultural resources that may qualify them for inclusion in the CRHR. Construction and O&M activities associated with Covered Activities could also affect cultural resources. However, identification procedures and treatment measures set forth in the PCCP CRMP, general plan policies, and standard agency measures are expected to reduce potential alterations to levels that are less than significant. Therefore, the impact would be less than significant.

Implementation of the local jurisdictions' general plans would be required to comply with Section 106 and AB 52 on a project-by-project basis. Compliance with federal, state, and local regulations would reduce potential impacts associated with these projects, but not to a less-than-significant level. Therefore, because the impacts associated with general plan implementation would be significant and unavoidable, the overall impact would also be significant and unavoidable.

**Impact CUL-2: Disturbance of any human remains, including those interred outside of dedicated cemeteries (NEPA: less than significant; CEQA: less than significant)**

Impacts of implementing Alternative 3 would be similar to or slightly less than those identified for CUL-2 under Alternative 2, the proposed action, because the acreage of potential restoration areas would likely be slightly smaller because of the reduced conversion of vernal pool complex under Alternative 3. Public and private development envisioned in the *Placer County General Plan* and the *City of Lincoln General Plan*, and SPRTA and PCWA projects would go forward and would have the same impact under Alternative 3 as under Alternative 2.

Activities under Alternative 3 have the potential to disturb known or unknown human remains. Disturbance of human remains under this alternative would most likely occur during ground-disturbing activities. The locations of known human remains are often obtained from government documents, archival data, oral histories, tribal consultation, or CHRIS data regarding previously recorded cultural resources or previous cultural resources studies. Unknown human remains are typically identified during archaeological construction monitoring, field surveys, testing, or data recovery.

Although the *Placer County General Plan* does not directly address impacts or procedures for the discovery or avoidance of human remains, policies and actions outlined in Section 7.2 (Goals 5.A and 5.D) provide guidance for avoidance and identification of cultural resources that may contain human remains. The *City of Lincoln General Plan* provides guidance (Policy OSC-6.10) for the discovery and treatment of human remains that comply with state and local laws and guidelines including California Health and Safety Code 7050.5, State CEQA Guidelines (Section 15064.5), and Public Resources Code Section 5097.98. In addition, a CRMP developed for the PCCP would reduce the potential impacts on cultural resources and human remains to a less-than-significant level. The CRMP identifies the procedures and standards that would be used to evaluate and address the potential impacts on cultural resources that may result from projects and activities permitted under the PCCP. By following the laws and guidelines identified in the *City of Lincoln General Plan*, the

*Placer County General Plan*, and the CRMP, the potential disturbance of human remains would be reduced to a less-than-significant level.

**NEPA Determination:** Ground-disturbing activities associated with PCCP conservation measures under Alternative 3 could disturb known or unknown human remains. However, CRMP policies and measures are expected to reduce the disturbance of human remains to levels that are less than significant. Ground-disturbing activities associated with Covered Activities could also disturb human remains. Projects subject to federal jurisdiction would be required to comply with Section 106 regarding the treatment of human remains. Compliance with federal, state, and local regulations would reduce disturbance of human remains resulting from Covered Activities to levels that are below significant. Therefore, the impact would be less than significant.

**CEQA Determination:** Ground-disturbing activities associated with PCCP implementation under Alternative 3 could disturb known or unknown human remains. However, CRMP policies and measures are expected to reduce the disturbance of human remains to levels that are less than significant. Ground-disturbing activities associated with Covered Activities could also disturb human remains. Projects subject to CEQA review would require compliance with the CEQA cultural resources regulations on a project-by-project basis and with state and local laws and regulations regarding the treatment of human remains. Compliance with federal, state, and local regulations would reduce disturbance to human remains to levels that are less than significant. Therefore, the impact would be less than significant. No mitigation has been identified.

**Impact CUL-3: Direct or indirect destruction of a unique paleontological resource or site or unique geologic feature (NEPA: significant and unavoidable; CEQA: significant and unavoidable)**

Several geologic units in the Plan Area are sensitive for paleontological resources, and fossils could be present. If fossils are present, they could be damaged during ground-disturbing activities. Most ground-disturbing activities associated with PCCP conservation measures would be related to CM3, which would involve grading to restore or create vernal pool and grassland habitat. Many of the areas designated as potential restoration areas are directly underlain by geologic units sensitive for paleontological resources (Table 3.4-2 and Figure 3.4-1). Excavation deeper than 3 feet in these units could damage paleontological resources. Substantial damage to or destruction of significant paleontological resources as defined by the SVP (Society of Vertebrate Paleontology 2010) would be a significant impact. Under Alternative 3, the potential areal extent of ground disturbance would be similar to or less than the extent under Alternative 2, the proposed action, because the acreage for potential restoration area would likely be slightly smaller due to reduced conversion of vernal pool complex. Ground-disturbing activities related to construction resulting from implementation of general plans for Placer County and the City of Lincoln and implementation of SPRTA and PCWA projects could also damage paleontological resources.

Compliance with the general plans would afford some protection to paleontological resources during ground-disturbing activities in potentially sensitive areas; however, the EIR for the *Placer County General Plan* found that these protections would not reduce potential impacts to a less-than-significant level. Therefore, the effect would be significant and unavoidable.

Similar impacts could result from construction activities associated with implementation of PCCP conservation measures; however, the PCA would implement Mitigation Measures CUL-1 and CUL-2 in the course of establishing the Reserve System. Implementation of Mitigation Measures CUL-1 and CUL-2 would reduce these impacts to a less-than-significant level.

**NEPA Determination:** Alternative 3 ground-disturbing activities associated with PCCP conservation measures and Covered Activities have the potential to disturb potentially significant paleontological resources if the activities occur in geologic units that are sensitive for these resources. Compliance with the general plans would afford some protection to paleontological resources during ground-disturbing activities in potentially sensitive areas; however, the EIR for the *Placer County General Plan* found that these protections would not reduce potential impacts to a less-than-significant level. Therefore, the effect would be significant and unavoidable. While implementation of Mitigation Measures CUL-1 and CUL-2 would reduce the impacts of activities associated with implementation of PCCP conservation measures to a less-than-significant level, the overall impact would remain significant and unavoidable.

**CEQA Determination:** Alternative 3 ground-disturbing activities associated with PCCP conservation measures and Covered Activities have the potential to disturb potentially significant paleontological resources if the activities occur in geologic units that are sensitive for these resources. Compliance with the general plans would afford some protection to paleontological resources during ground-disturbing activities in potentially sensitive areas; however, the EIR for the *Placer County General Plan* found that these protections would not reduce potential impacts to a less-than-significant level. Therefore, the effect would be significant and unavoidable. While implementation of Mitigation Measures CUL-1 and CUL-2 would reduce the impacts of activities associated with implementation of PCCP conservation measures to a less-than-significant level, the overall impact would remain significant and unavoidable.

**Mitigation Measure CUL-1: Retain a qualified professional paleontologist to monitor significant ground-disturbing activities**

**Mitigation Measure CUL-2: Stop work if substantial fossil remains are encountered during construction**

## **Alternative 4—Reduced Permit Term**

**Impact CUL-1: Potential to cause alteration of characteristics of known or unknown cultural resources that may qualify such resources for listing in the NRHP (NEPA) or CRHR (CEQA) (NEPA: significant and unavoidable; CEQA: significant and unavoidable)**

Implementation of the activities identified in the Placer County and City of Lincoln general plans could result in the loss of important previously identified and unknown cultural resources. For CEQA projects where the County is the lead agency, the cultural resources policies and actions outlined in Section 7.2 of the *Placer County General Plan* would be implemented. For projects where the City of Lincoln is the lead agency, Goals LU-2 and LU-3 and Goal OSC-6 of the *City of Lincoln General Plan* would be implemented. Following these guidelines would reduce potential impacts on cultural resources, but the impacts identified in the EIR for the *Placer County General Plan* would not be reduced to a less-than-significant level. Accordingly, such impacts would be considered significant and unavoidable.

Impacts resulting from PCCP implementation under Alternative 4 would be the same as those identified for CUL-1 under Alternative 2, the proposed action, although the permit term would be reduced from 50 to 30 years. The impacts on historical resources resulting from Covered Activities would also be similar to those identified for CUL-1 under Alternative 2 although there may be a smaller amount of land disturbed. Public and private development envisioned in the *Placer County*

*General Plan* and *City of Lincoln General Plan* as well as SPRTA and PCWA projects would go forward and would have the same impact under Alternative 4 as under Alternative 2.

Impacts on historical resources (CEQA) or historic properties (NEPA) could result from implementation of proposed PCCP conservation measures that require construction activities, such as earthmoving, re-contouring, excavation, or removal or modification of landscape features or structures. Conservation activities associated with PCCP implementation have the potential to result in significant impacts on historical resources and historic properties. Some physical actions required to implement CM2 and CM3 (Table 2-13 in Chapter 2, *Proposed Action and Alternatives*) involve ground disturbance and modifications to the built environment. For example, removal or modification of fences, ditches, trails, concrete dams, and roads listed in CM2 could cause a substantial adverse change to NRHP- or CRHR-eligible built environment resources by impairing the character-defining features of such resources and reducing or eliminating their ability to convey their historical significance. Ground-disturbing activities that extend below the surface such as restoration or creation of vernal pool complexes, construction of drainage ditches, mechanical re-contouring of hydrological features and disking of vegetation listed in CM2 and CM3 could cause significant damage to intact subsurface archaeological deposits and reduce or eliminate their ability to yield important data, thus causing a substantial adverse change to NRHP- or CRHR-eligible archaeological resources. General plan policies and standard agency measures would reduce the levels of effects.

Implementation of the Covered Activities under Alternative 4 could result in impacts, including the loss of important previously identified and unknown historical resources. However, a CRMP (Westwood 2016) has been developed for the PCCP which would reduce the potential impacts on cultural resources to a less-than-significant level. The CRMP identifies the procedures and standards that would be used to evaluate and address the potential impacts on cultural resources that may result from projects and activities permitted under the PCCP. These standards and procedures set forth in the CRMP would ensure that the individual projects are compliant with all federal, state, and local laws and regulations as they relate to cultural resources. Furthermore, the CRMP identifies the appropriate treatment for resources that would be significantly affected and provides guidance for developing resource-specific treatments. Standard treatment measures include capping of sites; data recovery excavation; project-specific public interpretation and education; construction monitoring; tribal access agreements; and Historic American Building Survey (HABS), Historic American Engineering Record (HAER), and Historic American Landscape Survey (HALS) programs.

**NEPA Determination:** Ground-disturbing activities or modifications to built resources associated with PCCP implementation under Alternative 4 could result in impacts on cultural resources. These activities and modifications could alter or destroy the characteristics of known or unknown cultural resources that may qualify for listing in the NRHP. Construction and O&M activities associated with Covered Activities could also affect cultural resources. However, identification procedures and treatment measures set forth in the PCCP CRMP, general plan policies, and standard agency measures are expected to reduce potential alterations to levels that are less than significant. Therefore, the impact would be less than significant.

Implementation of the local jurisdictions' general plans would be required to comply with Section 106 and AB 52 on a project-by-project basis. Compliance with federal, state, and local regulations would reduce potential impacts associated with these projects, but not to a less-than-significant level. Therefore, because the impacts associated with general plan implementation would be significant and unavoidable, the overall impact would also be significant and unavoidable.

**CEQA Determination:** Ground-disturbing activities or modifications to built resource associated with PCCP implementation under Alternative 3 could result in impacts on cultural resources. These activities or modifications could impair the characteristics of known or unknown cultural resources that may qualify them for inclusion in the CRHR. Construction and O&M activities associated with Covered Activities could also affect cultural resources. However, identification procedures and treatment measures set forth in the PCCP CRMP, general plan policies, and standard agency measures are expected to reduce potential alterations to levels that are less than significant. Therefore, the impact would be less than significant. No mitigation has been identified.

Implementation of the local jurisdictions' general plans would be required to comply with Section 106 on a project-by-project basis. Compliance with federal, state, and local regulations would reduce potential impacts associated with these projects, but not to a less-than-significant level. Therefore, because the impacts associated with general plan implementation would be significant and unavoidable, the overall impact would also be significant and unavoidable.

**Impact CUL-2: Disturbance of any human remains, including those interred outside of dedicated cemeteries (NEPA: less than significant; CEQA: less than significant)**

Impacts resulting from PCCP conservation measures under Alternative 4 would be similar to those identified for CUL-2 under Alternative 2, the proposed action, although there may be a smaller amount of land disturbed, although the permit term would be reduced from 50 to 30 years. The impacts of Covered Activities on human remains would also be similar to those identified for CUL-2 under Alternative 2. Public and private development envisioned in the *Placer County General Plan* and the *City of Lincoln General Plan*, and SPRTA and PCWA projects would go forward and would have the same impact under Alternative 4 as under Alternative 2.

Activities under Alternative 4 have the potential to disturb known or unknown human remains. Disturbance of human remains under this alternative would most likely occur during ground-disturbing activities. The locations of known human remains are often obtained from government documents, archival data, oral histories, tribal consultation, or CHRIS data regarding previously recorded cultural resources or previous cultural resources studies. Unknown human remains are typically identified during archaeological construction monitoring, field surveys, testing, or data recovery.

Although the *Placer County General Plan* does not directly address impacts or procedures for the discovery or avoidance of human remains, policies and actions outlined in Section 7.2 (Goals 5.A and 5.D) provide guidance for avoidance and identification of cultural resources that may contain human remains. The *City of Lincoln General Plan* provides guidance (Policy OSC-6.10) for the discovery and treatment of human remains that comply with state and local laws and guidelines including California Health and Safety Code 7050.5, State CEQA Guidelines (Section 15064.5), and Public Resources Code Section 5097.98. In addition, a CRMP developed for the PCCP would reduce the potential impacts on cultural resources and human remains to a less-than-significant level. The CRMP identifies the procedures and standards that will be used to evaluate and address the potential impacts on cultural resources that may result from projects and activities permitted under the PCCP. By following these laws and guidelines identified in the *City of Lincoln General Plan*, the *Placer County General Plan*, and the CRMP, the potential disturbance of human remains would be reduced to a less-than-significant level.

**NEPA Determination:** Ground-disturbing activities associated with PCCP implementation under Alternative 4 could disturb known or unknown human remains. However, CRMP policies and measures are expected to reduce the disturbance of human remains to levels that are less than significant. Covered Activities under this alternative could also disturb human remains. Projects subject to federal jurisdiction would be required to comply with Section 106 regarding the treatment of human remains. Compliance with federal, state, and local regulations would reduce disturbance of human remains resulting from Covered Activities to levels that are below significant. Therefore, the impact would be less than significant.

**CEQA Determination:** Ground-disturbing activities associated with PCCP implementation under Alternative 4 could disturb known or unknown human remains. However, CRMP policies and measures are expected to reduce the disturbance of human remains to levels that are less than significant. Covered Activities under this alternative could also disturb human remains. Projects subject to CEQA review would require compliance with the CEQA cultural resources regulations on a project-by-project basis and with state and local laws and regulations regarding the treatment of human remains. Compliance with federal, state, and local regulations would reduce disturbance of human remains to levels that are less than significant. Therefore, the impact would be less than significant. No mitigation has been identified.

**Impact CUL-3: Direct or indirect destruction of a unique paleontological resource or site or unique geologic feature (NEPA: significant and unavoidable; CEQA: significant and unavoidable)**

Several geologic units in the Plan Area are sensitive for paleontological resources, and fossils could be present. If fossils are present, they could be damaged during ground-disturbing activities. Most ground-disturbing activities associated with PCCP conservation measures would be related to CM3, which would involve grading to restore or create vernal pool and grassland habitat. Many of the areas designated as potential restoration areas are directly underlain by geologic units sensitive for paleontological resources (Table 3.4-2) (Figure 3.4-1). Excavation deeper than 3 feet in these units could damage paleontological resources. Substantial damage to or destruction of significant paleontological resources as defined by the SVP (Society of Vertebrate Paleontology 2010) would be a significant impact. Ground-disturbing activities related to construction resulting from implementation of general plans for Placer County and the City of Lincoln and implementation of SPRTA and PCWA projects also could damage paleontological resources. Under Alternative 4, it is expected that fewer acres would be restored than under Alternative 2, the proposed action. There would therefore be less ground-disturbing activity associated with this alternative. Compliance with the general plans would afford some protection to paleontological resources during ground-disturbing activities in potentially sensitive areas; however, the EIR for the *Placer County General Plan* found that these protections would not reduce potential impacts to a less-than-significant level. Therefore, the effect would be significant and unavoidable.

Similar impacts could result from construction activities associated with implementation of PCCP conservation measures; however, the PCA would implement Mitigation Measures CUL-1 and CUL-2 in the course of establishing the Reserve System. Implementation of Mitigation Measures CUL-1 and CUL-2 would reduce these impacts to a less-than-significant level.

**NEPA Determination:** Under Alternative 4, ground-disturbing activities associated with PCCP conservation measures and the Covered Activities have the potential to disturb potentially significant paleontological resources if the activities occur in geologic units that are sensitive for

these resources. Compliance with the general plans would afford some protection to paleontological resources during ground-disturbing activities in potentially sensitive areas; however, the EIR for the *Placer County General Plan* found that these protections would not reduce potential impacts to a less-than-significant level. Therefore, the effect would be significant and unavoidable. While implementation of Mitigation Measures CUL-1 and CUL-2 would reduce the impacts of activities associated with implementation of PCCP conservation measures to a less-than-significant level, the overall impact would remain significant and unavoidable.

**CEQA Determination:** Under Alternative 4, ground-disturbing activities associated with PCCP conservation measures and the Covered Activities have the potential to disturb potentially significant paleontological resources if the activities occur in geologic units that are sensitive for these resources. Compliance with the general plans would afford some protection to paleontological resources during ground-disturbing activities in potentially sensitive areas; however, the EIR for the *Placer County General Plan* found that these protections would not reduce potential impacts to a less-than-significant level. Therefore, the effect would be significant and unavoidable. While implementation of Mitigation Measures CUL-1 and CUL-2 would reduce the impacts of activities associated with implementation of PCCP conservation measures to a less-than-significant level, the overall impact would remain significant and unavoidable.

**Mitigation Measure CUL-1: Retain a qualified professional paleontologist to monitor significant ground-disturbing activities**

**Mitigation Measure CUL-2: Stop work if substantial fossil remains are encountered during construction**

### 4.4.3 Cumulative Analysis

#### Alternative 1—No Action

##### Cultural Resources

Under Alternative 1, the no action alternative, the PCCP would not be implemented and there would be no cumulative impact related to cultural resources. Implementation of the general plans would result in cumulative impacts, as identified in the EIR for the *Placer County General Plan*, which concluded that buildout of the general plan would make a considerable contribution to the cumulative impact.

##### Paleontological Resources

According to the EIR for the *Placer County General Plan* (Placer County 1994:7-12), increased development could result in occasional accidental disruption and adverse effects on unidentified paleontological resources resulting in a cumulative impact. Compliance with the local jurisdictions' general plan goals and policies would protect paleontological resources during ground-disturbing activities in potential sensitive areas, but the EIR for the *Placer County General Plan* (Placer County 1994:7-12) concluded that buildout of the general plan would make a considerable contribution to the cumulative impact.

## Alternative 2—Proposed Action

### Cultural Resources

Portions of the Plan Area may be sensitive for cultural resources. If cultural resources are present, they could be damaged during ground-disturbing activities associated with construction of projects. Compliance with the local jurisdictions' general plan goals and policies and the CRMP would reduce impacts, but implementation of the general plans would result in cumulative impacts, as identified in the EIR for the *Placer County General Plan*, which concluded that buildout of the general plan would make a considerable contribution to the cumulative impact.

### Paleontological Resources

Several geologic units in the Plan Area are sensitive for paleontological resources, and fossils could be present. If fossils are present, they could be damaged during ground-disturbing activities associated with construction of projects such as the Placer Parkway. According to the EIR for the *Placer County General Plan* (Placer County 1994:7-12), increased development could result in occasional accidental disruption and adverse effects on unidentified paleontological resources, resulting in a cumulative impact. Compliance with the local jurisdictions' general plan goals and policies would protect paleontological resources during ground-disturbing activities in potentially sensitive areas, but the EIR for the *Placer County General Plan* (Placer County 1994:7-12) concluded that buildout of the general plan would make a considerable contribution to the cumulative impact.

## Alternative 3—Reduced Take/Reduced Fill

### Cultural Resources

Portions of the Plan Area may be sensitive for cultural resources. If cultural resources are present, they could be damaged during ground-disturbing activities associated with construction of projects. Compliance with the local jurisdictions' general plan goals and policies and the CRMP would reduce impacts, but implementation of the general plans would result in cumulative impacts, as identified in the EIR for the *Placer County General Plan*, which concluded that buildout of the general plan would make a considerable contribution to the cumulative impact.

### Paleontological Resources

Several geologic units in the Plan Area are sensitive for paleontological resources, and fossils could be present. If fossils are present, they could be damaged during ground-disturbing activities associated with construction of projects such as the Placer Parkway. According to the EIR for the *Placer County General Plan* (Placer County 1994:7-12), increased development could result in occasional accidental disruption and adverse effects on unidentified paleontological resources, resulting in a cumulative impact. Compliance with the local jurisdictions' general plan goals and policies would protect paleontological resources during ground-disturbing activities in potentially sensitive areas, but the EIR for the *Placer County General Plan* (Placer County 1994:7-12) concluded that buildout of the General Plan would make a considerable contribution to the cumulative impact.

## Alternative 4—Reduced Permit Term

### Cultural Resources

Portions of the Plan Area may be sensitive for cultural resources. If cultural resources are present, they could be damaged during ground-disturbing activities associated with construction of projects. Compliance with the local jurisdictions' general plan goals and policies and the CRMP would reduce impacts, but implementation of the general plans would result in cumulative impacts, as identified in the EIR for the *Placer County General Plan*, which concluded that buildout of the general plan would make a considerable contribution to the cumulative impact.

### Paleontological Resources

Several geologic units in the Plan Area are sensitive for paleontological resources, and fossils could be present. If fossils are present, they could be damaged during ground-disturbing activities associated with construction of projects such as the Placer Parkway. According to the EIR for the *Placer County General Plan* (Placer County 1994:7-12), increased development could result in occasional accidental disruption and adverse effects on unidentified paleontological resources, resulting in a cumulative impact. Compliance with the local jurisdictions' general plan goals and policies would protect paleontological resources during ground-disturbing activities in potentially sensitive areas, but the EIR for the *Placer County General Plan* (Placer County 1994:7-12) concluded that buildout of the general plan would make a considerable contribution to the cumulative impact.

## 4.4.4 References Cited

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