

CULTURAL RESOURCES

4.4 CULTURAL RESOURCES

Cultural resources are buildings, objects, features, structures, sites, and districts with historic or cultural value. Cultural resources typically include: buildings or structures that exhibit architectural or aesthetic value that are associated with an event or a person or persons that have contributed in an important way to the shaping or development of the city, region, or nation; and objects, such as Native American artifacts discovered at a particular location or area of the city; or an archaeological, geological, or paleontological artifact, such as fossils. Protection of cultural resources is important in maintaining the historic character of Palo Alto.

This chapter discusses the regulatory framework and existing conditions related to cultural resources in Palo Alto, and evaluates the potential impacts that could occur as a result of Scenarios 5 and 6. This analysis is based on the Regulatory Framework and Existing Conditions information provided in the February 2016 Draft Environmental Impact Report (EIR).

4.4.1 ENVIRONMENTAL SETTING

No revisions are required to the Regulatory Framework and Existing Conditions information presented in the February 2016 Draft EIR.

4.4.2 STANDARDS OF SIGNIFICANCE

The proposed Plan would result in a significant cultural resources impact if it would:

1. Adversely affect a historic resource listed or eligible for listing on the National and/or California Register, or listed on the City's Historic Inventory.
2. Eliminate important examples of major periods of California history or prehistory.
3. Cause damage to an important archaeological resource as defined in §15064.5 of the California Environmental Quality Act (CEQA) Guidelines.
4. Disturb any human remains, including those interred outside of formal cemeteries.
5. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
6. Directly or indirectly destroy a local cultural resource that is recognized by City Council resolution.

4.4.3 IMPACT DISCUSSION

The remaining sections of this chapter provide an analysis of the potential project impacts, including impacts from growth expected to occur during the life of the proposed Plan, as well as cumulative cultural resource impacts that could occur as a result of the implementation of the proposed Plan when combined with projects outside of Palo Alto.

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The conclusions below are based on the same analytical approach used in the impact discussions in the February 2016 Draft EIR. The relevant characteristics of Scenarios 5 and 6 are described in detail in Section 3.4 of Chapter 3, Project Description, of this Supplement to the Draft EIR.

CULT-1 Implementation of the proposed Plan could adversely affect a historic resource listed or eligible for listing on the National and/or California Register, or listed on the City’s Historic Inventory. (Significant and Mitigable – Scenarios 5 and 6)

February 2016 Draft EIR Findings: Significant and mitigable for Scenarios 1 through 4. Mitigation Measure CULT-1 would apply to all four scenarios and would reduce the impact to a less-than-significant level.

Summary of Supplemental Analysis: The impact would be significant and mitigatable for Scenarios 5 and 6 and Mitigation Measure CULT-1 would reduce the impact to a less-than-significant level. Mitigation Measure CULT-1 has been revised, as shown below. These revisions will also be applied to the mitigation for Scenarios 1 through 4. The revisions do not change the original intent or effectiveness of Mitigation Measure CULT-1.

Mitigation Measure CULT-1: To ensure the protection of historic resources listed on the National and/or California Register or the City’s Historic Resource Inventory, the proposed Plan shall include policies that address the following topics:

- The effectiveness of the Historic Preservation Ordinance in preserving historic resources.
- Periodic updates to and maintenance of the City’s Historic Resource Inventory.
- Process for including potential historic resources in the City’s Historic Resources Inventory.
- Protection of archaeological resources.

Mitigation Measure CULT-1a: The City shall prepare and adopt an ordinance that would regulate the demolition or alteration of a historic resource listed on the National and/or California Register, or listed on the City’s Historic Inventory, if alterations would significantly alter the historic value and/or character defining features of the historic resource.

Mitigation Measure CULT-1b: Include a program in the Comprehensive Plan Update requiring the City to update and maintain the City’s Historic Resource Inventory to determine all historic resources that are eligible for the California Register as well as important examples of California history or prehistory. Historic resources may consist of a single building or structure or a district.

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~~Include a policy in the Comprehensive Plan requiring an evaluation prior to the issuance of a demolition or alterations permit, where proposed development would affect a potential historic resource that has not been evaluated for inclusion into the City's Historic Resources Inventory.~~

~~**Mitigation Measure CULT-1c:** The following policy and program, or equally effective language, shall be included in the proposed Plan to ensure that future development under all four scenarios would not adversely affect a historic resource listed or eligible for listing on the National and/or California Register, or listed on the City's Historic Inventory:~~

- ~~■ Policy: Protect Palo Alto's archaeological resources, including natural land formations, sacred sites, the historical landscape, historic habitats, and remains of settlements here before the founding of Palo Alto in the nineteenth century.~~
- ~~■ Program: Require that a records search of the California Historical Resources Information System be conducted and reviewed by a cultural resources professional for proposed new development to determine whether the site contains known prehistoric or historic cultural resources and the potential for as-yet-undiscovered cultural resources.~~

As discussed in the February 2016 Draft EIR, development anticipated under the Comp Plan Update could cause a significant impact on historic resources by:

- Demolishing an historic resource; which by definition would result in the material impairment of a resource's ability to convey its significance.
- Inappropriately modifying an historical resource, which may include using incompatible materials, designs, or construction techniques in a manner that alters character-defining features.
- Permitting new construction that could introduce significant incompatibility with an established architectural context (e.g., a historic district).

Historical architectural resources may be impacted by development allowed under the proposed Plan. Archaeological deposits are addressed under Impact CULT-3, and human remains are addressed under Impact CULT-4.

As shown on Figure 4.4-1 and in Appendix D, List of Historical Resources, in the February 2016 Draft EIR, there are over 850 structures/sites in Palo Alto that are identified as historical resources, including four districts. These resources include properties designated at the federal, State, and/or local levels, as well as properties determined to be eligible for listing in a historic register through formal evaluation. As discussed in Chapter 3, Project Description, future housing and non-residential development under Scenarios 5 and 6 would generally be concentrated within the Downtown, Stanford Research Park, California Avenue area, and El Camino Real and San Antonio Road corridors. Scenario 6 would consider additional housing sites in the western portion of the Stanford Research Park and near Stanford University Medical Center. Most of these areas include historical resources as recorded in the City's Historic Inventory and shown on Figure 4.4-1 of the February 2016 Draft EIR, or could include historical resources not yet recorded. Therefore, by

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establishing the regulatory framework to permit new residential and non-residential development that could either directly or indirectly adversely affect an historic resource, Scenarios 5 and 6 could have the potential to impact historic resources.

Even if the historical resources were retained, future development under the proposed Plan could cause a significant impact on historical resources if the new construction were incompatible with existing historic properties, or if the massing or design details of the new construction were incompatible with existing historical resources. Scenarios 5 and 6 would allow denser new residential development in Palo Alto through housing-related policies and zoning code amendments. As the city is currently built out and no changes to the land use map (with the exception of a potential change in designation at the Fry's Electronics site under Scenarios 4 and 6) would occur as part of the proposed Plan, this development would occur through redevelopment in urban areas of the city. Further, Scenario 6 considers the highest amount of new residential development than Scenarios 1 through 5, including development in areas not currently experiencing residential uses, such as the western portion of the Stanford Research Park and near Stanford University Medical Center. Because the purpose of Scenarios 5 and 6 is to allow denser new residential development, and because the factors that could impair the historic integrity of resources are generally more likely to be part of larger and denser new construction, the impacts on historical resources could be significant.

Currently, City policy and ordinances provide some flexibility related to the protection of historic resources in Palo Alto, including for City Council discretion on a project-by-project basis in issuing a statement of overriding considerations due to identified benefits of a proposed development where a significant unavoidable impact is found. Although development under Scenarios 5 and 6 would potentially result in a significant impact, the Draft EIR does not anticipate specific impacts to any particular historic resource. Further, any future development or infrastructure project allowed by the proposed Plan would be subject to separate project-level CEQA review in order to identify potential impacts to a specific historical resource and incorporate mitigation measures as needed, including City Council consideration of the potential benefits of the proposed project and potential significant, unavoidable impacts.

Compliance with federal, State, and local laws, as described in Section 4.4.1.1, Regulatory Framework, of the February 2016 Draft EIR, would tend to ensure future development would not be detrimental or injurious to listed or eligible historic resources in the vicinity of individual development projects. However, the regulatory framework does not presently explicitly protect historic resources from demolition or inappropriate additions, and the City does not have an updated inventory of resources that are eligible for the California Register. Specifically, while the City in practice does not allow demolition of historic resources without a replacement structure, the City's ordinance does not prohibit demolition of historic resources once a replacement structure is approved (and appropriate CEQA review has been completed). Therefore this impact is *significant* under Scenarios 5 and 6, requiring mitigation.

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Applicable Regulations:

- National Historic Preservation Act of 1966 – National Register of Historic Places
- California Register of Historical Resources
- City of Palo Alto Historic Preservation Ordinance

Significance before Mitigation: Because the City’s historical resource inventory is out of date, and the City’s ordinance does not explicitly prohibit demolition of historic resources, this impact is significant under Scenarios 5 and 6, requiring mitigation.

Mitigation Measures

Mitigation Measure CULT-1 would apply to Scenarios 5 and 6.

Significance after Mitigation: Less than Significant. Under Mitigation Measure CULT-1, the City would include policies in the Comp Plan to improve the effectiveness of the City’s Historic Preservation Ordinance, keep the City’s Historic Resource Inventory up to date and include potential historic resources on the City’s Historic Resources Inventory, and protect archaeological resources. With implementation of Mitigation Measure CULT-1, although individual future projects would still require separate environmental review where applicable and may result in project-level impacts to historic resources, the impact of adopting the proposed Comp Plan would be reduced to a less-than-significant level.

CULT-2	Implementation of the proposed Plan could eliminate important examples of major periods of California history or prehistory. (Significant and Mitigable – Scenarios 5 and 6)
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February 2016 Draft EIR Findings: Significant and mitigable for Scenarios 1 through 4. Mitigation Measure CULT-2 would apply to all four scenarios and would reduce the impact to a less-than-significant level.

Summary of Supplemental Analysis: The impact would be significant and mitigatable for Scenarios 5 and 6 and Mitigation Measure CULT-2 would reduce the impact to a less-than-significant level.

Mitigation Measure CULT-2: Implement Mitigation Measures CULT-1a, ~~CULT-1b, and CULT-1c.~~

As discussed in the February 2016 Draft EIR, the proposed Plan could cause a significant impact on important examples of major periods of California history or prehistory by:

- Demolishing an historical resource, this by definition results in the material impairment of a resource’s ability to convey its significance.

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- Inappropriately modifying an historical resource, including using incompatible materials, designs, or construction techniques in a manner that alters character-defining features.
- Permitting inappropriate new construction adjacent to an historical resource which could introduce incompatible new buildings that clash with an established architectural context (e.g., a historic district).
- Demolishing, relocating, or altering an archaeological or paleontological resource representative of major periods of California history or prehistory.

Examples of major periods of California history or prehistory are:

- An historical resource listed or eligible for listing on the National and/or California Register, or listed on the City's Historic Inventory.
- Significant archaeological or paleontological resources.

Potential impacts to historic resources are discussed in Impact CULT-1. Potential impacts to archaeological resources are discussed in Impact CULT-3. Potential impacts to paleontological impacts are discussed in CULT-5. As noted in these impact discussions, the impacts from implementation of the proposed Plan would be *significant* under Scenarios 5 and 6, requiring mitigation.

Applicable Regulations:

- National Historic Preservation Act of 1966 – National Register of Historic Places
- American Indian Religious Freedom Act
- Executive Order 11593
- California State Senate Bill 18
- California Register of Historical Resources
- 2013 California Historical Building Code, California Code of Regulations, Title 24, Part 8
- Mills Act of 1972
- City of Palo Alto Historic Preservation Ordinance
- Municipal Code Chapter 18.12.140 – Historical Review and Incentives
- Compatibility Review Standards for Replacement Houses

Significance before Mitigation: Impacts to historic, archaeological, and paleontological impacts are considered to be significant under Scenarios 5 and 6, requiring mitigation.

Mitigation Measures

Mitigation Measure CULT-2 would apply to Scenarios 5 and 6.

Significance after Mitigation: Less than Significant.

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CULT-3 Implementation of the proposed Plan could cause damage to an important archaeological resource as defined in Section 15064.5 of the CEQA Guidelines. (Potentially Significant and Mitigable – Scenarios 5 and 6)

February 2016 Draft EIR Findings: Significant and mitigable for Scenario 1; potentially significant and mitigable for Scenarios 2 through 4. Mitigation Measure CULT-3 would apply to Scenarios 2 through 4 and would reduce the impact to a less-than-significant level after mitigation:

Summary of Supplemental Analysis: The impact would be potentially significant and mitigatable for Scenarios 5 and 6 and Mitigation Measure CULT-3 would reduce the impact to a less-than-significant level.

Mitigation Measure CULT-3: Implement Mitigation Measure CULT-1. In addition, The following policies, or equally effective language, shall be included in the proposed Plan to ensure that future development under all four scenarios would not damage archaeological resources, the proposed Plan shall include policies that address the following topics:

- Archaeological surveys and mitigation plans for future development projects.
- Developer compliance with applicable regulations regarding the identification and protection of archaeological and paleontological deposits.
- Adequate tribal consultation and consideration of tribal concerns.
- ~~Policy: Protect Palo Alto's archaeological resources, including natural land formations, sacred sites, the historical landscape, historic habitats, and remains of settlements here before the founding of Palo Alto in the nineteenth century.~~
- ~~Policy: Require that a records search of the California Historical Resources Information System be conducted and reviewed by a cultural resources professional for proposed new development to determine whether the site contains known prehistoric or historic cultural resources and to determine the potential presence of as-yet-undiscovered cultural resources.~~
- ~~Policy: Require that areas found to contain significant prehistoric artifacts be examined by a qualified consulting archaeologist for appropriate protection and preservation.~~
- ~~Policy: Require that if cultural resources, including archaeological or paleontological resources, are uncovered during grading or other on-site excavation activities, construction shall stop until appropriate mitigation is determined and implemented.~~
- ~~Policy: Require that any archaeological or paleontological resources on a development project site, as a condition of project approval, be either preserved at their location or adequately documented as a condition of removal. When a development project has sufficient flexibility, avoidance and preservation of the resource shall be the primary mitigation measure, unless the City identifies a superior mitigation. If resources are documented, their preservation should be coordinated with descendants and/or stakeholder groups, as warranted.~~

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- ~~Policy: Continue to consult with tribes as required by California Government Code Section 65352.3. In doing so, use appropriate procedures to accommodate tribal concerns when a tribe has a religious prohibition against revealing precise information about the location or previous practice at a particular sacred site.~~

As discussed in the February 2016 Draft EIR, the proposed Plan would have a significant impact on the environment if ground-disturbing activities associated with new development allowed under the proposed Plan would cause a substantial adverse change in the significance of a historical archaeological resource. A substantial adverse change in the significance of an historical archaeological resource would occur from its demolition, destruction, relocation, or alteration such that the significance of the resource would be materially impaired. Although the level of development under Scenarios 5 and 6 varies, both scenarios have the potential to cause damage to an important archaeological resource since any new development activity proposed by the scenarios would include ground-disturbing activities. Therefore, the discussion below treats the impact potential from Scenarios 5 and 6 the same.

Historical and pre-contact archaeological deposits that meet the definition of historical resources under CEQA could be damaged or destroyed by ground-disturbing activities associated with development from all six scenarios allowed under the proposed Plan. Should this occur, the ability of the deposits to convey their significance, either as containing information important in prehistory or history, or as possessing traditional or cultural significance to Native American or other descendant communities, would be materially impaired.

Although the locations identified as potential areas for future development under Scenarios 5 and 6 would mostly be concentrated in previously developed areas of the EIR Study Area, the potential remains that previously undiscovered archaeological deposits could be discovered from ground-disturbing activities associated with new development. In addition, Scenarios 5 and 6 assume that grade separation of the Caltrain tracks would be created at all grade crossings (both in anticipation of possible future High Speed Rail service and to alleviate existing safety and traffic congestion issues), which would create substantial ground disturbance. Further, Scenario 6 would implement Bus Rapid Transit on El Camino Real and would consider new housing sites in the western portion of Stanford Research Park and near the Stanford University Medical Center, which would result in potential ground disturbance within the EIR Study Area. Since the EIR Study Area in its entirety has not been systematically surveyed, it is probable that unrecorded Native American prehistoric archaeological sites exist in the areas identified for potential future development, including those that are buried under alluvial or fill soils due to the age of geologic deposits within the city, which have the potential to contain prehistoric archaeological resources. In addition, archaeological deposits are often found along historic waterways. The historic waterways in Palo Alto include San Francisquito Creek, Matadero Creek, Barron Creek, and Adobe Creek. Therefore, there is a potential for significant subsurface historical archaeological features and other historic debris. However, any discretionary future development or infrastructure project allowed by the proposed Plan would be subject to separate project-level CEQA review in order to identify potential environmental impacts and incorporate

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mitigation measures as needed, including identifying the potential to cause damage to an undiscovered archaeological resource.

Similar to Scenarios 1 through 4, development under both Scenarios 5 and 6 would be required to comply with applicable federal and State regulations that protect archaeological resources. However, current regulations must be supported by Comp Plan policies to ensure that impacts would be less than significant. Because the proposed Plan development is still in process, under Scenarios 5 and 6 it has not yet been decided which policies would be included in the proposed Plan. Therefore, the impact would be *potentially significant* under both scenarios, requiring mitigation.

Applicable Regulations:

- American Indian Religious Freedom Act
- Executive Order 11593
- California State Senate Bill 18

Significance before Mitigation: Under Scenarios 5 and 6, because the proposed Plan is still in process it has not yet been decided which policies will be adopted, the impact is potentially significant, requiring mitigation.

Mitigation Measures

Mitigation Measure CULT-3 would apply to Scenarios 5 and 6.

Significance after Mitigation: Less than Significant.

CULT-4	Implementation of the proposed Plan would not disturb any human remains, including those interred outside of formal cemeteries. (Less than Significant – Scenarios 5 and 6)
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February 2016 Draft EIR Findings: Less than Significant for Scenarios 1 through 4.

Summary of Supplemental Analysis: The impact would be less than Significant for Scenarios 5 and 6.

As discussed in the February 2016 Draft EIR, the proposed Plan would substantially disturb human remains if it would not comply with federal, State, and local regulations that outline the human remain response procedures. Although the level of development being considered under Scenarios 5 and 6 varies, both scenarios have the potential to disturb human remains since any new development activity proposed by the Scenarios would include ground disturbing activities. Therefore, the discussion below treats the impact potential from Scenarios 5 and 6 the same.

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Human remains associated with pre-contact archaeological deposits could exist in the EIR Study Area, and could be encountered at the time potential future development occurs. The associated ground-disturbing activities, such as site grading and trenching for utilities, have the potential to disturb human remains interred outside of formal cemeteries. Descendant communities may ascribe religious or cultural significance to such remains and disturbance of unknown human remains could be a significant impact.

As described in the February 2016 Draft EIR, any human remains encountered during ground-disturbing activities associated with future development under the six scenarios would be subject to federal and State regulations, such as the California Health and Safety Code Section 7050.5, Public Resources Code Section 5097.98, and the California Code of Regulations Section 15064.5(e) (CEQA), which state the mandated procedures of conduct following the discovery of human remains. 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 Santa Clara 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 Native American Heritage Commission (NAHC) within 24 hours, who will, in turn, notify the person the NAHC identifies as the most likely descendant (MLD) of any human remains. Further actions shall be determined, in part, by the desires of the MLD. The MLD has 48 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 48 hours, the owner shall, with appropriate dignity, reinter 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. For ministerial projects that are not subject to the provisions of CEQA, the California Health and Safety Code Section 7050.5 would require that construction or excavation be stopped if human remains are discovered, until it can be determined if the remains are those of a Native American. If determined to be Native American, the Coroner must contact the NAHC. Compliance with the mandatory regulatory procedures described above would ensure that potential impacts related to the potential discovery or disturbance of any human remains accidentally unearthed during construction activities as a result of Scenarios 5 and 6 would be *less than significant*.

Applicable Regulations:

- California Health and Safety Code Section 7050.5
- Public Resources Code Section 5097.98
- California Code of Regulations Section 15064.5(e) (CEQA)

Significance before Mitigation: Compliance with existing regulations and procedures would ensure that impacts are less than significant under Scenarios 5 and 6.

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CULT-5 Implementation of the proposed Plan would have the potential to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. (Potentially Significant and Mitigable – Scenarios 5 and 6)

February 2016 Draft EIR Findings: Significant and mitigable for Scenario 1; potentially significant and mitigable for Scenarios 2 through 4. Mitigation Measure CULT-5 would apply to Scenarios 2 through 4 and would reduce the impact to a less-than-significant level after mitigation:

Summary of Supplemental Analysis: The impact would be potentially significant and mitigatable for Scenarios 5 and 6 and Mitigation Measure CULT-5 would reduce the impact to a less-than-significant level.

Mitigation Measure CULT-5: ~~Implement Mitigation Measure CULT-3. The following policies, or equally effective language, shall be included in the proposed Plan to ensure that future development under all four scenarios would not damage paleontological resources:~~

- ~~■ Policy: Require that areas found to contain significant prehistoric artifacts be examined by a qualified consulting archaeologist for appropriate protection and preservation.~~
- ~~■ Policy: Require that if cultural resources, including archaeological or paleontological resources and unique geologic features, are uncovered during grading or other on-site excavation activities, construction shall stop until appropriate mitigation is determined and implemented.~~
- ~~■ Policy: Require that any archaeological or paleontological resources on a development project site, as a condition of project approval, be either preserved at their location or adequately documented as a condition of removal. When a development project has sufficient flexibility, avoidance and preservation of the resource shall be the primary mitigation measure, unless the City identifies a superior mitigation. If resources are documented, their preservation should be coordinated with descendants and/or stakeholder groups, as warranted.~~

As discussed in the February 2016 Draft EIR, the proposed Plan would have a substantial effect on the environment if it would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Although the level of development under Scenarios 5 and 6 varies, both scenarios have the potential to directly or indirectly destroy paleontological resources or sites or unique geologic features since any new development activity proposed by the scenarios would include ground-disturbing activities. Therefore, the discussion below treats the impact potential from Scenarios 5 and 6 the same.

As stated in Section 4.4.1.2 of the February 2016 Draft EIR, there are known paleontological resource sites within the EIR Study Area. The presence of these paleontological resource sites indicates that there are likely undiscovered paleontological resources within the EIR Study Area.

Although the proposed Plan would not in and of itself result in direct physical development, future development as a result of implementation of the proposed Plan could result in potentially significant impacts to a unique paleontological resources or site, or unique geologic feature. Development under both

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scenarios would be required to comply with applicable federal and State regulations that protect paleontological resources. However, current regulations must be supported by Comp Plan policies to ensure that impacts would be less than significant.

Because the proposed Plan is in process, under Scenarios 5 and 6, it has not yet been decided which policies would be included in the proposed Plan. Therefore, the impact would be *potentially significant* under Scenarios 5 and 6, requiring mitigation.

Applicable Regulations:

- Federal Executive Order 11593
- CEQA

Significance before Mitigation: Under Scenarios 5 and 6, because the proposed Plan is still in process it has not yet been decided which policies will be adopted, the impact is potentially significant, requiring mitigation.

Mitigation Measures

Mitigation Measure CULT-5 would apply to Scenarios 5 and 6.

Significance after Mitigation: Less than Significant.

CULT-6	Implementation of the proposed Plan would directly or indirectly destroy a local cultural resource that is recognized by City Council resolution. (Significant and Mitigable – Scenarios 5 and 6)
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February 2016 Draft EIR Findings: Significant and mitigable for Scenarios 1 through 4. Mitigation Measure CULT-6 would apply to all four scenarios and would reduce the impact to a less-than-significant level after mitigation:

Summary of Supplemental Analysis: The impact would be significant and mitigatable for Scenarios 5 and 6 and Mitigation Measure CULT-6 would reduce the impact to a less-than-significant level.

Mitigation Measure CULT-6: Implement Mitigation Measures ~~CULT-1a, CULT-1b, and CULT-1c.~~

As discussed in the February 2016 Draft EIR, the local cultural resources recognized by City Council resolution include all the resources identified on the City's Historic Inventory, which includes over 850 structures and four historic districts. The Professorville Historic District and Ramona Street Architectural District are located in northwest Palo Alto. The two Eichler-developed residential subdivisions, which include the Green Gables and Greenmeadow Historic Districts, are located near the eastern and southern boundaries of Palo Alto, respectively.

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Although the level of development under Scenarios 5 and 6 varies, both scenarios have the potential to directly or indirectly destroy a local cultural resource recognized by City Council resolution.

Because potential impacts to resources on the City's Historic Inventory were discussed under Impact CULT-1, please refer to this discussion for an assessment on how cultural resources recognized by City Council resolution would be affected by the proposed Plan.

As discussed under Impact CULT-1, potential impacts from future development on or adjacent to local cultural resources that are recognized by City Council resolution would be *significant* under both scenarios, requiring mitigation.

Applicable Regulations:

- National Historic Preservation Act of 1966 – National Register of Historic Places
- California Register of Historical Resources
- City of Palo Alto Historic Preservation Ordinance

Significance before Mitigation: Because the City's Historic Resource Inventory is out of date, and the City's ordinance does not explicitly prohibit demolition of historic resources, this impact is significant under Scenarios 5 and 6, requiring mitigation.

Mitigation Measures

Mitigation Measure CULT-6 would apply to Scenarios 5 and 6.

Significance after Mitigation: Less than Significant.

4.4.4 CUMULATIVE IMPACTS

CULT-7	Implementation of the proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in significant cumulative impacts with respect to cultural resources. (Significant and Mitigable– Scenarios 5 and 6)
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February 2016 Draft EIR Findings: Significant and mitigable for Scenarios 1 through 4. Mitigation Measure CULT-7 would apply to all four scenarios and would reduce the impact to a less-than-significant level after mitigation:

Summary of Supplemental Analysis: The impact would be significant and mitigatable for Scenarios 5 and 6 and Mitigation Measure CULT-7 would reduce the impact to a less-than-significant level.

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Mitigation Measure CULT-7: Implement Mitigation Measures CULT-1a, ~~CULT-1b~~, ~~CULT-1c~~, and CULT-3, and ~~CULT-5~~.

As discussed in Chapter 4, Environmental Evaluation, of the February 2016 Draft EIR, this EIR (and Impacts CULT-1 through CULT-7) assesses the potential impacts of growth projected to occur during the life of the proposed Plan within the Palo Alto. This section about cumulative impacts considers whether there are impacts that might be more severe or significant when considered in conjunction with projects or development occurring outside of the City's control.

Potential future development permitted under the proposed Plan, in conjunction with buildout of the region, has the potential to cumulatively impact historical resources. Such impacts could result from more intensive land uses, incompatible site designs that impact the historical integrity of nearby historical buildings and districts, and demolition of historical resources. Furthermore, development within the EIR Study Area also has the potential to adversely affect archaeological resources, paleontological resources, and human remains through their destruction or disturbance. Therefore, before mitigation, development allowed by the proposed Plan, in combination with other future development in the city and the region, has the potential to cause adverse cumulative impacts to cultural resources due to their destruction or loss of integrity. However, the mandatory regulation described in Section 4.4.3, Impact Discussion of this Supplement to the Draft EIR, and Section 4.4.1, Regulatory Framework of the February 2016 Draft EIR would help reduce impacts to such resources that would occur from development and land use changes allowed by the proposed Plan. However, because the City does not currently have an up-to-date list of resources eligible for the California register and also do not have an ordinance in place that would prevent demolition or alterations of historic or cultural resources, significant impacts to cultural resources could occur. Therefore, Scenarios 5 and 6 have the potential to result in a *significant* contribution to cumulative cultural resources impacts and mitigation would be required.

Significance before Mitigation: Development allowed by the proposed Plan, in combination with other future development in the city and the region, has the potential to cause adverse cumulative cultural resource impacts, which would be a significant impact under Scenarios 5 and 6, requiring mitigation.

Mitigation Measures

Mitigation Measure CULT-7 would apply to Scenarios 5 and 6.

Significance after Mitigation: Less than Significant.