

4.11 HISTORICAL, CULTURAL, AND ARCHAEOLOGICAL RESOURCES

Construction in the Specific Plan area would affect a number of known cultural resources. A prehistoric mound, CA-MRN-68, was located near the East Ward Street entrance to the Niven Nursery, although it has been flattened by agricultural activities. The Bickerstaff ranch, an 1852 adobe, may have been constructed atop the mound.

Other historic resources within the Specific Plan area include some early Niven Nursery structures, and buildings and railroad artifacts associated with the Northwestern Pacific Railroad station. The railroad structures and railbed are contributing elements of the Downtown Larkspur National Register Historic District.

4.11.1 EXISTING SETTING

REGIONAL SETTING

The archaeology of central California has been analyzed in terms of separate cultural periods that change based on subsistence systems, burial practices, and trade networks. In the early 1970s, Fredrickson (1973, 1974) proposed a sequence of cultural patterns for the central districts of the North Coast Ranges, including the Specific Plan area. These different cultural patterns could be characterized by:

- < similar technological skills and devices (specific cultural items);
- < similar economic modes (production, distribution, consumption), including especially participation in trade networks and practices surrounding wealth; and
- < similar mortuary and ceremonial practices (Fredrickson 1973).

The following is a summary of these temporal periods with descriptions of the associated cultural patterns that have been identified for the project region. The summaries incorporate recent revisions that are summarized from the recent work of White and Fredrickson (1992).

Paleo-Indian Period (10,000 B.C. to 6000 B.C.)

This period saw the first spread of humans into California with most known sites being situated along lakeshores. A developed mano/metate technology may have been present at this time, although evidence regarding this technology is scarce. Tribes were not heavily dependent upon trade networks, and trading activities occurred on an ad hoc, individual basis. Characteristic artifacts noted in the assemblages include fluted projectile points and flaked crescents.

Lower Archaic Period (6000 B.C. to 3000 B.C.)

The beginning of this period coincided with a climatic shift to more arid conditions. Subsistence appears to have been focused more on plant foods, although hunting clearly still provided important food and raw material sources. Settlement appeared to be semi-sedentary

with little emphasis on material wealth. Most tools were manufactured of local materials, and exchange remained on an ad hoc basis. Distinctive artifact types include large projectile points, milling slabs, and handstones.

Middle Archaic Period (3000 B.C. to 1000 B.C.)

This period starts at the end of mid-Holocene climatic conditions when weather patterns became similar to present-day conditions. Discernable cultural change was likely brought about in response to these changes in climate and accompanying variation in floral and faunal resources. Economic systems likely included the introduction of acorn processing technology. Hunting remained an important source of food, although reliance on plant foods appears to have dominated the subsistence system. There was an overall growth in population and a general expansion in land use. Important artifacts characteristic of this period include the introduction of the bowl mortar and pestle and the continued use of large projectile points.

Upper Archaic Period (1000 B.C. to A.D. 500)

A marked expansion of sociopolitical complexity marks this period. There was a greater complexity of trade systems with evidence for regular, sustained exchanges between groups. Shell beads gained in significance as possible indicators of personal status and as important trade items. This period retained large projectile points, but the milling stone and handstone were replaced throughout most of California by the bowl mortar and pestle.

Emergent Period (A.D. 500 to 1800)

This period is distinguished by the advent of several technological and social changes. The bow and arrow were introduced. Territorial boundaries between groups became well established and were documented in early historic accounts. The exchange of goods between groups became more regular. The clamshell disk bead became a monetary unit of exchange and increasing quantities of goods were transported over greater distances.

Cultural traits that distinguish this period include distinctive burial practices. Artifact assemblages include clam and *Olivella* shell disk beads, magnesite cylinders, and *Haliotis* (abalone) ornaments, as well as bird bone whistles and tubes and flanged soapstone pipes. The mortar and pestle are the predominant milling implements and small arrow points replaced the larger projectile point forms.

Understanding of these periods, their associated artifact types, and the reasons for cultural change during the prehistoric era sets a framework for the interpretation of prehistoric cultural resources found within the Specific Plan area.

CULTURAL SETTING

The Specific Plan area is located in a part of Marin County that is known to have been occupied, at least intermittently, for the past 6,000 years or more based upon evidence gathered from archaeological sites in the region (Fredrickson 1973). The ethnographic

inhabitants of the area were the Coast Miwok Indian group who are known to have established villages in the vicinity of the Specific Plan area (Kroeber 1925). This region historically comprised ranching, orchards, and similar land uses. During this historic period, much of the historic bay marshland was filled.

Coast Miwok territory included Marin County up to the interface with the Kashaya Pomo, Southern Pomo, and Wappo in Sonoma County (Kelly 1978). Most likely, Native Americans encountered by Drake and Cermeño during their voyages would have been Coast Miwok. There are few other records of these peoples until the latter portions of the 18th century, when the enforced missionization of many of the Coast Miwok took its toll on the culture. At the beginning of the American period (ca. 1850), there were approximately 250 Coast Miwok left. By the 1930s, there were reportedly three individuals who retained predominantly Coast Miwok heritage (Kelly 1978).

Archaeological Resources

One prehistoric site was identified within the Specific Plan area, CA-MRN-68, originally recorded by N.C. Nelson in 1907. During a field inspection of the Niven property (Subarea 3) in 1995, Miley Holman (Holman & Associates) found evidence of material similar to that which Nelson noted in 1907, with small, finely fractured shellfish remains seen throughout the area extending from the entrance to the property on East Ward Street along the western border of the property. Holman reported that the shellmound as discovered by Nelson had been substantially leveled by agricultural uses of the land, and had been scattered over the landscape and into the marsh to the north and east of the original homestead at the site. None of the visible deposits of what appeared to be aboriginal soils (midden) seemed to be associated with an intact deposit of material; however, actual intact midden areas could exist in areas covered by pavement in and around the original location of CA-MRN-68, and perhaps buried under the floors of the standing greenhouses.

In addition, several historic resources were noted during the various site surveys. The Bickerstaff ranch and adobe, built on a knoll in the Specific Plan area in 1852, has been razed; however, deposits and features associated with the complex may still be found within the Specific Plan area. The Niven Nursery itself, dating from the early 1920s (and particularly buildings in the west nursery area dating from 1921 to the 1930s) may be eligible for listing on the NRHP under several criteria. The Northwestern Pacific Railroad station and tracks, located on the southwestern portion of the Specific Plan area, have been found to be contributing elements to the Downtown Larkspur National Register Historic District. As these structures are on the NRHP, they are automatically eligible for listing on the California Register of Historical Resources (CRHR) as well.

Results of Record Search

In 1995, Holman conducted an updated literature review and record search at the Northwest Information Center of the California Historical Resources Information System, located at Sonoma State University, to obtain information about recorded archaeological resources in and

around the Specific Plan area. This was repeated by William Self Associates in 1999. In both of these cases, one prehistoric site was identified on the property (CA-MRN-68), originally recorded by N. C. Nelson in 1907. In neither case did the record search indicate that there had been any formal cultural resources survey of the site. The record searches included a review of all recorded historic and prehistoric archaeological sites within a 0.5-mile radius of the Specific Plan area as well as a review of all known cultural resource surveys and excavation reports.

No previous archaeological surveys have been recorded within the Niven property (Subarea 3), although several surveys have been performed within 0.5-mile of the Specific Plan area. Those surveys were performed for an AT&T fiber optic cable project (Origer 1991, S#13217); a water pipeline project (Roop 1991, S#16949); a Piper Park project (Jackson 1976, S#17567); and the Elm Avenue project (Morre 1996, S#18590). No new cultural sites were discovered near the Specific Plan area as a result of these surveys. However, Nels Nelson recorded a Native American burial ground (CA-MRN-67) just south of the Specific Plan area in 1907. CA-MRN-67 was situated on what was, before the Niven Nursery, the Hoster dairy farm pasture. The pastureland abutted Corte Madera Creek and marsh.

Results of Field Survey

Holman conducted a field reconnaissance of the Specific Plan area in 1995 (Holman & Associates 1995). At the time, Holman noted shell midden scattered along the western portion of the property, as well as imported fill materials and evidence of soil disturbances. Holman also noted the historic structures from the Niven Nursery.

William Self Associates principal, William Self, conducted a reconnaissance survey of the Specific Plan area on October 5, 1999 (William Self Associates 1999). Numerous pre-1940 nursery greenhouses, outbuildings, office and residences, as well as more modern structures and both hardscape and landscaping, were noted in much of the Specific Plan area. An area of several acres in the eastern portion of Subarea 3 was noted as having been subject to filling and grading over many years, as well as plowing. Several pieces of marine oyster shell (*Ostrea*) were evident in the soil, as were two pieces of nondiagnostic historic ceramic. These materials were believed to be representative of imported fill material, not an in-place cultural deposit. Self suggested that, given the history of earth movement on the property, it was unlikely that these surface manifestations could yield significant information. However, he noted that the possibility remained that a portion of the shell midden from CA-MRN-68 might be intact below the ground surface.

A geotechnical study (Harza Engineering Company 1998a) revealed that the majority of the Niven property (Subarea 3) is covered with 4 to 9 feet of fill. There is no mention in that study of the presence of shell or "midden." However, the borings represent only a very small sample of the total property, and it is possible that they could have failed to record extant shell midden deposits, as that was not the purpose of the borings. If subsurface cultural materials exist, they are most likely capped by fill.

A limited testing program was completed by Holman & Associates (2003). This included 29 auger borings between the nursery buildings, concentrating on the former location of the Bickerstaff complex and the East Ward Street entrance to the property. Two large areas of intact midden were found, near the eastern and southwestern portions of the property. These deposits may well extend beneath existing structures. More diffuse, disturbed midden was also found scattered across the Specific Plan area. More extensive testing, to be done by Holman & Associates at the request of the City, will take place before the Final EIR is completed to refine information regarding spatial extent, content, and NRHP or CRHR eligibility of the deposits.

Historic Resources

In March 1998, Holman indicated (Holman & Associates 1998) that the site of the 1846 encampment of Captain John C. Fremont and his troops following the battle at Olompali may have been located just outside the Niven property (or, perhaps, the encampment extended into it). Historic deposits associated with this encampment may still exist within the Specific Plan area, despite subsequent alteration of the land. Holman also indicated that various 19th century historical deposits associated with the Bickerstaff ranch and adobe (built in 1852 on a knoll that was said to have been the site of a shellmound, razed in 1922) are likely to be found in hollow fill type deposits contained in privies, wells, and cisterns present at the Niven property (Subarea 3); these historic archaeological deposits would possess a significant record of early domestic/agricultural life spanning a considerable period from the early 1850s through the early 1900s.

In his report on the field investigation of the Niven site (Subarea 3) conducted in 1995, Holman indicated that the property contained the remainder of the original farmhouse complex at its entrance and retained intact almost all of the Niven Nursery complex dating from the early 1920s. In Holman's opinion, development-related activity that might have adverse effects on the nursery complex would be considered potentially significant under CEQA criteria.

In April 2000, Ward Hill, an architectural historian, completed his evaluation of the Niven Nursery site (Subarea 3) under the criteria of the CRHR. He conducted a detailed survey of the Niven Nursery on March 17, 2000, and archival research and oral history on the property during that month. His report concludes that the original nursery company buildings in the west nursery area dating from 1921 to the 1930s appear to be eligible for the CRHR under Criteria A, B, and C. The contributing buildings in the west nursery include greenhouses 2, 3, 4, 5, 7, 8, and 9 and the Niven House, all of which appear to retain a good level of historic integrity. These buildings appear to be eligible under Criterion A because they are associated with an important early business in Larkspur, and under Criterion B because of their important association with George Niven, founder of the nursery, who was a significant figure in the flower industry. The greenhouses also appear to be eligible under Criterion C because they are likely rare, surviving examples of greenhouses dating from the 1920s or 1930s.

The buildings that once housed the Northwestern Pacific Railroad station and warming house located in the southwestern portion of the Specific Plan area were built in 1929, and were used

to support railroad operations until the station was closed in 1941. Although these two buildings have been identified as contributors to the Historic District, the Video Monde building and the nearby warehouse are not contributing buildings to the Historic District. Originally the station master's residence, the building that is now the American Legion hall, was built sometime before 1909. The former railroad yard building in this group is a one-story wooden structure.

Interview with George Heierle

Mr. Heierle is a longtime employee of and one-time resident at the Niven Nursery. He arrived at the nursery with his family in 1926. The following is a summary of questions and answers from an interview on August 15, 2000:

< *Do you remember where the Bickerstaff House was located?* Representatives of the City Heritage Preservation Committee were concerned that the historic Bickerstaff House may have been located on the property. Although the exact location of the house (destroyed in 1922) is unknown, the committee was concerned about the possibility that remains of the house may exist on the property.

Mr. Heierle remembered that the hill on which the Bickerstaff House had stood was partially bulldozed in 1937 or 1938. The dirt from the top of the hill was pushed toward the bay to help fill in the marshy land in the northeastern portion of the property. The original location of the hill, now leveled, served as the base for a series of greenhouses used for the production of roses beginning shortly after the conclusion of World War II.

There are no intact remains directly associated with the Bickerstaff House on the Niven property. William Self Associates concluded that there is no likelihood that in-place remains exist on the property that could add to the understanding of this resource.

< *Do you remember where the Indian site was located? What remains were found?* Representatives of the City Heritage Preservation Committee were concerned that an intact prehistoric Native American site might lie beneath the surface of the property.

Mr. Heierle indicated that many people had found Native American artifacts such as "arrowheads" on the property since 1926. He said that occasionally he would see pockets of shell or charcoal around the property, presumably shell midden, although he was unable to indicate specific locations of concentrations of shell midden. At no point during the interview did Mr. Heierle mention having seen human remains.

< *Can you describe the history of earth moving at the nursery? What happened to each of these sites?*

As mentioned previously, Mr. Heierle remembered that the hill on which the Bickerstaff House had stood was partially bulldozed in 1937 or 1938. The dirt from the top of the hill was pushed toward the bay to help fill in the marshy land in the northeastern portion of the property. The original location of the hill, now leveled, served as the base for a series of

greenhouses used for the production of roses beginning shortly after the conclusion of World War II.

REGULATORY SETTING

CEQA offers guidelines regarding impacts on historic and prehistoric archaeological resources. CEQA states that if a project would result in significant impacts on important historical resources, then alternative plans or mitigation measures must be considered. However, only significant historical resources need to be addressed.

The State CEQA Guidelines define a significant historical resource as “a resource listed or eligible for listing on the California Register of Historical Resources” ([CEQA] §5024.1), “a resource included in a local registry of historic resources,” or a resource deemed historically significant by the lead agency (CEQA Guidelines §15064.5(a)). A historical resource may be eligible for inclusion on the CRHR if it:

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

In addition, the State CEQA Guidelines require consideration of unique archaeological sites (Guidelines §15064.5(c)). If an archaeological site does not meet the criteria for a historical resource, but does meet the definition of a unique archeological resource as outlined in CEQA §21083.2, it may be treated as a significant resource.

4.11.2 ENVIRONMENTAL IMPACTS

THRESHOLDS OF SIGNIFICANCE

Implementation of the Specific Plan would have a significant impact if it were to result in:

- < the direct or indirect destruction of a unique paleontological resource;
- < the physical demolition, destruction, relocation, or alteration of a unique archaeological resource;
- < the physical demolition, destruction, relocation, or alteration of a historical resource or its immediate surroundings to the extent that those physical characteristics that convey the historical significance and justify the identification of the historic resource (or the eligibility for such identification) would be materially altered;
- < the direct or indirect destruction of a unique geological feature; or

< the disturbance of any human remains, including those interred outside of formal cemeteries.

PROJECT-LEVEL IMPACTS

Impact
4.11-1

Potential Direct or Indirect Destruction of Unique Paleontological Resources. *No unique paleontological resources have been identified within the Specific Plan area. This impact is considered **less than significant**.*

Paleontological resources, also known as fossils, are the remains or traces of prehistoric plants and animals. No unique paleontological resources have been identified within the Specific Plan area, and implementation of the Specific Plan would not be expected to result in either the direct or indirect destruction of any unique paleontological resources. This impact is considered less than significant.

Impact
4.11-2

Potential Damage to or Destruction of Archaeological Resources. *Construction-related activities may damage or destroy intact portions of prehistoric site CA-MRN-68, other unknown Native American archaeological resources, and/or unknown historic resources (e.g., features related to the Bickerstaff ranch and adobe, and the 1846 encampment of Captain John C. Fremont). This impact is considered **potentially significant**.*

Intact portions of prehistoric site CA-MRN-68 have been identified within the Specific Plan area. Construction-related activities, including excavation, trenching, or grading, may damage or destroy portions of this site or other features related to the Bickerstaff ranch and adobe, as well as Native American archaeological resources. It is also possible that other, currently unknown archaeological resources may be uncovered during project construction, including the 1846 encampment of Captain John C. Fremont and his troops following the battle at Olompali. This impact is considered potentially significant.

Impact
4.11-3

Alteration of or Other Effects on Known Historical Resources. *Construction may include demolition or alteration of extant structures or destruction of historic features, and construction and development could result in structures built within the right-of-way of the historic railroad. This impact is considered **significant**.*

A number of historic resources have been noted within the Specific Plan area, including portions of the Niven Nursery from the 1920s–1930s that may be eligible for listing on the CRHR, and the Northwestern Pacific Railroad station and warming house, as well as the railroad right-of-way. The Specific Plan (Land Use Standard 7 [Railroad Plaza]) indicates that a centrally located and publicly oriented open space should be provided adjoining the railroad station and warming house, to be designed as both a focus and amenity for adjacent commercial and residential uses and as a setting for community-oriented activities and events. In addition, Specific Plan Community Design Standard 18 (Railroad Station and Warming House) indicates that the original character-defining features of the railroad station and warming house buildings should be documented, to the extent possible, and restored using the following sequence of action:

1. Protect and maintain those features that are extant and in good condition.
2. Repair those features that have been damaged or covered by other construction using the least amount of intervention possible. Do not replace building features that can be repaired.
3. Replace missing historic features using the following order of priorities:
 - < Recover, if possible.
 - < If unrecoverable, reproduce using photographs or other documentation.
 - < If documentation is inadequate, design a new feature that is compatible with the remaining character-defining elements of the building. The new feature should be clearly differentiated to avoid creating a false historical appearance.

Specific Plan Land Use Policy 17 (Existing Uses Encouraged) and Community Design Policy 36 (New Construction on the American Legion Property) indicate that the existing structures on the American Legion hall parcel in Subarea 1 (two of which date from the early 1900s) should be retained in their current uses, but that in the event that the existing buildings are demolished or removed, new construction shall maintain a scale and appearance consistent with existing and planned neighboring buildings and grounds. In addition, Specific Plan Land Use Policy 11 (Railroad Buildings) and Community Design Policies 12 (Railroad Right-of-Way) and 31 (Railroad Right-of-Way Bikeway and Parking) indicate that construction should be limited in the railroad right-of-way.

Construction activities may include demolition or alteration of extant structures, destruction of historic features, or placement of structures in the railroad right-of-way. However, Land Use Standard 7 (Railroad Plaza) requires adequate open-space be retained adjacent to the railroad buildings to provide an appropriate setting for these historic structures. Nonetheless, the Specific Plan would permit the development of Subarea 3 and thus necessitating the demolition of some or all of the existing buildings associated with the Niven Nursery. This impact is considered significant.

Impact
4.11-4

Potential Direct or Indirect Destruction of Unique Geologic Features. *No unique geologic features have been identified within the Specific Plan area. This impact is considered less than significant.*

No unique geologic features have been identified within the Specific Plan area, and implementation of the Specific Plan would not be expected to result in either the direct or indirect destruction of any unique geologic features. This impact is considered less than significant.

Impact
4.11-5

Possible Discovery of Human Remains. Construction activities may result in the inadvertent discovery of human remains, possibly associated with CA-MRN-68. This impact is considered **potentially significant**.

Implementation of the Specific Plan would not result in the disturbance of any known human remains. However, it is possible that during remediation activity in Subarea 3 or construction activity associated with the implementation of the Specific Plan, human remains could be uncovered. This impact is considered potentially significant.

CUMULATIVE IMPACTS

Cultural resources are a site-specific resource in Marin County. Cumulative growth in Marin County, and in the city of Larkspur, would result in cumulative impacts on cultural resources and consequent loss of those resources throughout the region. The Specific Plan, as currently designed, would result in the loss of prehistoric site CA-MRN-68, the Niven Nursery, and potentially as-yet-undiscovered features related to the Bickerstaff ranch and adobe or the Fremont encampment. This is a significant and unavoidable cumulative impact.

4.11.3 MITIGATION MEASURES

PROJECT MITIGATION MEASURES

No mitigation measures are required for the following less-than-significant impacts.

- 4.11-1: Potential Direct or Indirect Destruction of Unique Paleontological Resources
- 4.11-4: Potential Direct or Indirect Destruction of Unique Geologic Features

The following mitigation measures are recommended for potentially significant impacts.

Impact
4.11-2a, b
mitigation

Potential Damage to or Destruction of Archaeological Resources.

(a) Implement Archaeological Testing Program

The City shall include the following new policy in the Specific Plan.

New Policy: An archaeological subsurface testing program to delineate and define the elements of CA-MRN-68 shall be implemented before the beginning of construction. The archaeologist will make a preliminary assessment of NRHP and CRHR eligibility based on the results of the testing. If CA-MRN-68 is found to be potentially eligible for listing, then destruction of this site must be avoided.

(b) Monitor Construction

The City shall include the following new policy in the Specific Plan.

New Policy: A professional archaeologist, who meets the Secretary of the Interior’s Standards and Guidelines, and a Native American observer (identified through the Native American Heritage Commission) shall be present to monitor ground disturbing activities within the Specific Plan area. In the event that any archaeological resources are uncovered within the Specific Plan area during future remediation or construction activity associated with the implementation of the Specific Plan, there shall be no further excavation or disturbance of the site or any nearby area until the archaeologist has evaluated the find and appropriate site-specific mitigation has been identified to protect, preserve, remove, or restore the artifacts uncovered.

Impact
4.11-3
mitigation

Alteration of or Other Effects on Historical Resources.

Document Historic Structures

The City shall include the following new policy in the Specific Plan.

New Policy: The Niven Nursery structures that appear to be eligible for listing in the CRHR shall be documented according to Historic American Buildings Survey (HABS) standards. This task shall be performed by a qualified Architectural Historian who meets the Secretary of the Interior’s Standards and Guidelines, and shall be accomplished by those proposing development of Subarea 3 and approved by the City Planning Department before any demolition permit for that property is issued.

As indicated in the State CEQA Guidelines (Guidelines §15126.4(b)(2)), “In some circumstances, documentation of an historic resource, by way of historic narrative, photographs or architectural drawings, as mitigation for the effects of demolition of the resource will not mitigate the effects to a point where clearly no significant effect on the environment would occur.” Although documentation would mitigate the demolition of these structures to some extent, it would not reduce the effects of demolition to a less-than-significant level, and demolition of these structures would remain a significant and unavoidable impact associated with implementation of the Specific Plan.

Impact
4.11-5
mitigation

Possible Discovery of Human Remains.

Stop Potentially Damaging Work if Human Remains are Uncovered During Construction, Assess the Significance of the Find, and Pursue Appropriate Management

The City shall include the following new policy in the Specific Plan.

New Policy: California law recognizes the need to protect Native American human burials, skeletal remains, and items associated with Native American burials from vandalism and inadvertent destruction. The procedures for the

treatment of Native American human remains are contained in California Health and Safety Code §7050.5 and §7052 and CEQA §5097.

In accordance with the California Health and Safety Code, if human remains are uncovered during construction at the project site, the construction contractor shall immediately halt potentially damaging excavation and notify the City or the City's designated representative. The City shall immediately notify the coroner. The California Health and Safety Code states that if human remains are found in any location other than a dedicated cemetery, excavation must to be halted in the immediate area, and the county coroner is to be notified to determine the nature of the remains. The coroner is required to examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or state lands (California Health and Safety Code §7050.5[b]). If the coroner determines that the remains are those of a Native American, he or she must contact the Native American Heritage Commission by phone within 24 hours of making that determination (California Health and Safety Code §7050[c]). The responsibilities of the City for acting upon notification of a discovery of Native American human remains are identified in CEQA §5097.9.

Although recovery of remains would mitigate their being disturbed to some extent, it would not reduce the effects of the disturbance to a less than significant level. If found, disturbance of human remains would remain a significant and unavoidable impact associated with implementation of the Specific Plan.

CUMULATIVE MITIGATION MEASURES

As mentioned above, cultural resources are a site-specific resource in Marin County. Cumulative growth in Marin County, and in the city of Larkspur, would result in cumulative impacts on cultural resources and consequent loss of those resources throughout the region. Proposed mitigation measures described above would reduce the impacts to the extent feasible, primarily by maximizing data collection before site destruction. However, the impact caused by the loss of these sites is considered significant and unavoidable.

4.11.4 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Following implementation of the above mitigation measures, Impacts 4.11-2 and 4.11-3 would remain significant and unavoidable. If human remains are found during construction, and development of the site cannot be avoided, then Impact 4.11-5 would also remain significant and unavoidable. These impacts would also constitute a considerable contribution to cumulative cultural resources impacts.