4.6 CULTURAL RESOURCES

This analysis is based on a Phase I Cultural Resources Investigation (see Appendix I) prepared for the project by Conejo Archeological Consultants (June 2013), as well as cultural resource analyses prepared for the Tajiguas Landfill Project Environmental Documents

4.6.1 Setting

4.6.1.1 Ecological Setting

The study area is located in the western half of the Santa Barbara Channel region, which supports a wide variety of habitats. There is a general elevational zonation of the upland vegetation from the beach through the coastal plain and foothills up the southern slopes of the Santa Ynez Mountains. Native vegetative habitats in the area include coastal strand, coastal bluff, coastal sage scrub, grassland, oak savanna, oak woodland, chaparral, and riparian woodland. Non-native habitats include ruderal vegetation (non-native weeds growing in disturbed areas) and cultivated areas. The various vegetation habitats in turn support a wide array of wildlife species.

The marine environment of the Santa Barbara Channel also supports a wide variety of habitats that include kelp beds, sandy beaches, rocky intertidal, bays, estuaries, and lagoons. Historically, the largest kelp beds on the California coast occurred between Point Conception and Rincon Point. Kelp beds support a large invertebrate community including abalone, crabs, clams, oysters, shrimp, lobster, and squid. Kelp beds also feed and provide shelter for numerous species of fish. Seals and sea lions feed in the kelp beds and haul out and breed on adjacent sandy beaches. The bays, estuaries, and lagoons are important habitats for resident bird species as well as migrating waterfowl.

The Mediterranean climate of the project area is typified by long, hot summers, and wet, mild winters. Perennial and seasonal drainages run down the slopes of the Santa Ynez Mountains and foothills to the coast.

The rich plant and animal resources of the surrounding terrestrial and marine environments, availability of fresh water, and Mediterranean climate combined to make the Santa Barbara Channel region a desirable location for prehistoric habitation and supported one of the highest prehistoric population densities among hunter-gatherers anywhere in the world. These same attributes would later encourage settlement of the Santa Barbara Channel region by the Spanish, Mexican, and American cultures.

The Tajiguas Landfill is located within Cañada de la Pila, a narrow coastal canyon within the Santa Ynez Mountain range. Pila Creek is seasonal and dry most of the year. The landfill has been in operation since 1967 and its use has resulted in major modifications to the canyon. Los Padres National Forest is located to the north of the landfill, while U.S. Highway 101, the Union Pacific Railroad tracks and the Pacific Ocean are located to the south. The lands to the east and west of the project site are primarily open space or used for agriculture.

4.6.1.2 Regional Prehistoric Overview

This section briefly summarizes the regional and cultural history of the Santa Barbara coastal area. For detailed information on the description of time frames, establishment, organization, and cultural or physical affinities of earlier populations the reader is referred to Moratto (1984), King (1990), and Grant (1978).

The archaeological record indicates that sedentary populations occupied the coastal regions of California more than 9,000 years ago (Greenwood 1972). Several chronological frameworks have been developed for the Chumash region. One of the most definitive works on Chumash chronology is that of King (1990). King postulates three major periods; Early, Middle and Late. Based on artifact typologies from a great number of sites, he was able to discern numerous style changes within each of the major periods.

The Early Period (8000 to 3350 Before Present [B.P.]) is characterized by a primarily seed processing subsistence economy. The Middle Period (3350 to 800 B.P.) is marked by a shift in the economic/subsistence focus from plant gathering and the use of hard seeds, to a more generalized hunting-maritime-gathering adaptation, with an increased focus on acorns. The full development of the Chumash culture, one of the most socially and economically complex hunting and gathering groups in North America, occurred during the Late Period (800 to 150 B.P.).

4.6.1.3 Regional Ethnographic Overview

The project area lies within the historic territory of the Native American Indian group known as the Chumash. The Chumash occupied the region from San Luis Obispo County to Malibu Canyon on the coast, and inland as far as the western edge of the San Joaquin Valley, and the four northern Channel Islands (Grant 1978). The Chumash are subdivided into factions based on distinct dialects. The Barbareño Chumash occupied the narrow coastal plain from Point Conception to Punta Gorda in Ventura County (Grant, 1978). The name Barbareño is derived from the mission with local jurisdiction, Santa Barbara.

Chumash society developed over the course of some 9,000 years and achieved a level of social, political and economic complexity not ordinarily associated with hunting and gathering groups (Morrato, 1984). The prehistoric Chumash are believed to have maintained one of the most elaborate bead money systems in the world, as well as one of the most complex non-agricultural societies (King, 1990).

The Chumash aboriginal way of life ended with Spanish colonization. As neophytes brought into the mission system, they were transformed from hunters and gatherers into agricultural laborers and exposed to diseases to which they had no resistance. By the end of the Mission Period in 1834, the Chumash population had been decimated by disease and declining birthrates. Population loss as a result of disease and economic deprivation continued into the next century.

Today, many people claim their Chumash heritage in Santa Barbara County. In general, they place high value on objects and places associated with their past history, especially burials, grave goods, and archaeological sites.

4.6.1.4 Regional Historic Overview

In 1769, Gaspar de Portola and Father Junipero Serra departed the newly established San Diego settlement and marched northward toward Monterey, with the objective to secure that port and establish five missions along the route. The combined sea and land 1769-1770 Portola expedition, which passed through Santa Barbara County on its way to Monterey, was the prelude to systematic Spanish colonization of Alta California.

In 1795, Jose Francisco Ortega (the original founder of the Santa Barbara Presidio) was granted six leagues known as the *Rancho Nuestra Senora del Refugio* (Cowan, 1977). This was the only land grant licensed under Spanish Rule in what today is known as Santa Barbara County. The Ortegas built adobes at Refugio and later at Tajiguas Canyon, Arroyo Hondo, and Cañada del Corral. They grew wheat, maintained a vineyard, and ran large herds of cattle and horses on the rancho.

By the early 1800's, Refugio Bay was a well-known port to ships visiting the California coast, as the captains could trade at the Ortega settlement free of the duties imposed by the Spanish colonial government (Bancroft 1886, Tomkins 1960). However, the pirate Bouchard effectively ended the bay's era as a trading/smuggling port when he sacked and burned the Refugio hacienda in 1818.

In 1822, Mexico gained its independence from Spain, and in 1834 the Missions were secularized and their lands granted as rewards for loyal service or in response to an individual's petition. Ortega's grandson, Don Jose Vicente Ortega obtained the *Rancho Nuestra Senora del Refugio* in 1834. By this time, separate Ortega ranchos had been established in the Arroyo Hondo, Arroyo Quemado, and Tajiguas canyons to the west (Tompkins, 1960).

Following conquest of California by the United States in 1847, California became a state in 1850. The U.S. Land Commission patented the claim of 26,529 acres of *Rancho Nuestra Senora del Refugio* to Antonio Maria Ortega in 1866. Declining cattle prices and a serious four-year drought in the 1860s led to the sale of various rancho lands throughout California.

The 357 acre landfill site opened in 1967 and has been in continual use for municipal solid waste disposal since then. Waste disposal operations take place approximately 1/4 mile from U.S. Highway 101 and occur within a 118 acre permitted area. The 1,083 acre Baron Ranch was purchased by the County in 1991 to provide a buffer zone between the landfill and adjacent private holdings, to prevent future subdivision and residential development adjacent to the landfill, provide flexibility for RRWMD solid waste operations, provide options for mitigation and possible future public access.

4.6.1.5 Records Search

A records search was conducted at the Central Coast Information Center on June 5, 2013. The records search included a review of all archaeological site records and investigative reports within a 0.5-mile radius of the project site.

Archaeological Sites

Three archaeological sites are recorded within a 0.5-mile radius of the project site. There are no recorded sites or isolates within areas to be affected by the proposed Resource Recovery Project. The nearest archaeological site to the project site is CA-SBa-3494, which is located approximately 2,000 feet northwest of the nearest project component (composting area storage tank). Two prehistoric sites, CA-SBa-92 & CA-SBa-1990, are recorded at the mouth of Cañada de la Pila adjacent to the Tajiguas Landfill entrance. A description of these three sites is provided below.

CA-SBa-3494 was recorded as "…*light density shell scatter (chione, oyster, turritella, razor clam) and a Monterey chert flake near the mouth of the canyon. This scatter could be a secondary deposit. A rock shelter is approximately 50' (15 meters) above the canyon in the north wall and 20' (6 meters) east of the scatter…The shelter measures about 6' (2 meters) in depth (front to back) by 7' (2 meters in width and is about 5' (1.5 meters) in height. The ceiling is blackened. No indication of pictographs or petroglyphs was observed*… (Brown, 1998)."

In 2004, an Extended Phase 1 Archeological Investigation (SAIC, 2004) was completed at this site due to encroaching soil stockpiling activities. The results of the Investigation determined that the shell scatter associated with CA-SBa-3494 was a secondary, disturbed deposit, meaning that the cultural material originated from a different location. The shell fragments found on the modern ground surface may have eroded down from somewhere further up the small canyon, or may have been imported with the modern trash noted in the trenches. Further, no evidence of prehistoric or historic use was noted within the rock shelter, and the geologic feature has no association with the shell scatter below. CA-SBa-3494, therefore, consists of a light shell scatter that originated from an unknown source, and the site has no spatial integrity.

CA-SBa-92 may represent the remnants of a village site first recorded by D.B. Rogers in 1929 as "*Park*" (Rodgers Site No. 92) (Rodgers 1929). Ruby (1999a) indicates that only a low density scatter of shell and chert debitage is now visible on the surface of the site. The site area has been highly impacted by highway construction, buried gas and electric lines, and the road leading up to the Tajiguas Landfill. However, it is possible that the site maybe partially intact below the disturbed surfaces (Ruby, 1999a). CA-SBa-92 is located adjacent to the entrance road to the Tajiguas Landfill.

CA-SBa-1990 is located to near the entrance road to the Tajiguas Landfill and was recorded as a "*moderate density frequently used temporary campsite*" (Neff and Rudolph, 1986).

Previous Archaeological Investigations

Four archaeological investigations have been conducted within the Tajiguas Landfill property and are described below:

- Billman (1986) conducted a field survey of much of the Tajiguas Landfill property, and no cultural resources were identified within the areas surveyed.
- Brown (1998) conducted a ten-acre survey within northern portions of the Tajiguas Landfill property, and identified a rock shelter and associated small shell scatter, which was later designated site CA-SBA-3494. Brown (1998) recommended that the rock shelter be subjected to Extended Phase 1 archaeological testing.
- In 2004, Science Applications International Corporation (SAIC) conducted an Extended Phase 1 Archaeological Investigation at CA-SBa-3494 and determined the site did not qualify as a unique resource under Public Resources Code 21083.2 because the rock shelter had no evidence for prehistoric or historic use, and the light shell scatter of material represented a redeposit from an unknown source. No further archaeological investigation or monitoring was recommended for CA-SBa-3494.

- Conejo Archeological Consultants conducted a survey of 62 acres for the Tajiguas Landfill Reconfiguration and Baron Ranch Restoration Project in 2008, which included approximately 11.8 acres just north of the proposed MRF/AD Facility site. No prehistoric or historic resources were identified during this field survey (Conejo Archeological Consultants, 2008).

Federal, State & County Listings

The listings of the National Register of Historic Places (National Park Service, 2013), California Historical Landmarks (California Parks and Recreation, 2013) and California Points of Historical Interest (California Parks and Recreation, 1992) include no properties within a 0.5-mile radius of the project site. The California State Historic Resources Inventory also lists no historic properties within a 0.5-mile radius of the project site (California Parks and Recreation, 2012). There are no Santa Barbara County Historical Landmarks or Places of Historical Merit within a 0.5-mile radius of the project site (Santa Barbara County, 2012).

4.6.1.6 Field Reconnaissance

The proposed project (including the relocated landfill maintenance building and the temporary landfill administration facilities) would primarily affect areas within the existing landfill footprint that have been highly disturbed. However, there are three locations where construction would extend into previously undisturbed areas; two small tank sites (water tanks site, composting area runoff collection tank site) and a slope cut-back area (west borrow area above MRF/AD Facility site). These areas were surveyed by Conejo Archeological Consultants on June 12, 2013. Travis Spier (Operations Manager) identified potential impact areas in the field. Both tank sites are located on ridges and encompass an approximate 0.5 acre impact area.

Linear transects spaced at approximately 30 feet apart were used to survey the two tank locations. Due to vegetative cover, ground surface visibility was approximately 35 percent overall. Survey methodology for the cut-back slope included walking the top ridge and base of the slope, with some scrambling over the landslide slump area. This area has been highly impacted by the original slope cutting. No evidence of prehistoric or historic resources was observed at either tank location or in the vicinity of the slope cut-back area.

4.6.1.7 Native American Consultation

The Native American Heritage Commission (NAHC) sacred lands file search failed to identify any cultural resources within the immediate project area, but recommended a list of Native American individuals and organizations be contacted. The following NAHC list of recommended Chumash contacts were emailed or mailed a project description letter dated June 4, 2013, and asked to respond with any comments or concerns regarding the project:

- Alva-Padilla, Adelina, Chair Woman, Santa Ynez Tribal Elders Council
- Armenta, Vincent, Santa Ynez Band of Mission Indians
- Arredondo, Frank
- Baker, Crystal, Coastal Band of the Chumash Nation
- Banuelos, Raudel Joe Jr., Barbareño/Ventureño Band of Mission Indians
- Cordero, Michael, Coastal Band of the Chumash Nation
- DeSoto, Ernestine
- Folkes, Beverly Salazar
- Garcia, Janet, Coastal Band of the Chumash Nation
- Guzman-Folkes, Randy
- Miller, Stephen William
- Owl Clan
- Pappo, Kathleen, Barbareño/Ventureño Band of Mission Indians
- Parra, Charles
- Parra-Hernandez, Melissa
- Pulido, Carol
- Romero, Freddy, Cultural Preservation Consultant, Santa Ynez Tribal Elders Council
- Ruiz, John
- Tumamait, Julie, Barbareño/Ventureño Band of Mission Indians
- Tumamait, Patrick
- Tribal Administrator, Santa Ynez Band of Mission Indians
- Unzueta, Gilbert M., Jr.
- Unzueta, Regina, Barbareño Chumash
- Vigil, Chief Mark Steven, San Luis Obispo County Chumash Council

To date, two Native American responses have been received. On June 10, 2013, Mr. Romero of the Santa Ynez Tribal Elders Council emailed:

Thank you for the notice of this proposed project. I do have some concern given the fact that there is a known rock shelter within the landfill area itself. But even beyond that given the cultural landscape of the area, there is the possibility for impact to unidentified cultural material.

I was wondering if you have noticed the local tribes and requested their input? I'm leaning more towards one of the 2 alternatives. That would be my recommendation. I don't know how much investigation has taken place or exhausted in terms of utilizing these alternatives, but I would rather see one of those areas utilized for this purpose.

I would very much like to see what the local tribes have to say about this project and hear their concerns. Should you receive any, would you share them with me?

On June 19, 2013, Conejo Archeological Consultants emailed Mr. Romero a copy of the CA-SBa-3494 site record and a copy of SAIC's 2004 Extended Phase 1 Report. Mr. Romero responded that the tribe did not concur with the findings of the SAIC report.

Mr. Tumamait indicated the project alternatives are all located in areas sensitive for Native American cultural resources. On June 26, 2013, Mr. Tumamait and Ms. Maki discussed the recommendations that Conejo Archeological Consultants was providing for this project. Mr. Tumamait concurred with Conejo's recommendations, which have been incorporated into this Subsequent EIR.

4.6.2 Impact Analysis and Mitigation Measures

4.6.2.1 Thresholds of Significance

State CEQA Guidelines Section 15064.5

A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.

(1) Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.

(2) The significance of an historical resource is materially impaired when a project:

> (A) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or

(B) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

(C) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a Lead Agency for purposes of CEQA.

Santa Barbara County Environmental Thresholds and Guidelines Manual – Cultural Resource Guidelines

A project is considered to have a significant impact if it would damage an important cultural resource. For the purposes of CEQA, an "important archaeological resource" can be defined as having one or more of the following characteristics:

1. Is associated with an event or person with recognized significance in California or American history; or recognized scientific importance in prehistory.
2. Can provide information which is of both demonstrable public interest and useful in addressing scientifically consequential and reasonable or archaeological research questions,
3. Has a special or particular quality such as oldest, best example, largest, or last surviving example of its kind.
4. Is at least 100 years old and possesses substantial stratigraphic integrity; or
5. Involves important research questions that historical research has shown can be answered only with archaeological methods.

4.6.2.2 Approved Tajiguas Landfill Expansion Project

The following is a summary of the impacts identified in 01-EIR-05 for the Tajiguas Landfill Expansion Project (see Section 3.5.3).

- According to 01-EIR-05, the Tajiguas Landfill Expansion Project was expected to result in direct disturbance to Site CA-SBa-3494 since the site is located within the footprint of the landfill expansion. This impact was considered significant and unavoidable (Class I). Mitigation measures provided in 01-EIR-05 required further field surveys and, if applicable, data recovery for all known or potential cultural sites subject to ground disturbance. Pursuant to these mitigation measures, an Extended Phase 1 Archaeological Investigation was conducted by SAIC in 2004 and monitored by Mike Lopez, Chumash monitor with DNA and Associates. The investigation determined that the shell associated with CA-SBa-3494 was a secondary, disturbed deposit and the rock shelter was not associated with any prehistoric or historic cultural activity and no further testing, monitoring or other measures were required.

- 01-EIR-05 determined Sites CA-SBa-92, CA-SBa-1990 and SBA-iso-645 would not be directly impacted by landfill expansion, but may be indirectly impacted through continued landfill operation and landfill closure activities. These impacts were considered significant, but mitigable (Class II) with the implementation of additional surveys if the sites were subject to ground disturbance, stopping or redirecting work if cultural remains were encountered, and cultural resource training program for landfill staff.

4.6.2.3 Approved Tajiguas Landfill Reconfiguration

Based on field surveys completed for the Subsequent EIR prepared for the Reconfiguration Project (see Conejo Archeological Consultants, 2008), landfill reconfiguration would not impact any cultural resources at the Tajiguas Landfill site.

4.6.2.4 Proposed Tajiguas Resource Recovery Project

Impact TRRP CR-1: Ground disturbance associated with implementation of the proposed project may result in damage to unknown archeological resources at the landfill site – Class II Impact.

Based on past archeological field surveys and those conducted for the project, no evidence of archeological resources were found in areas that would be affected by project-related ground disturbance. However, excavation at the tank sites has the potential to encounter unknown buried cultural resources.

Mitigation Measures:

MM TRRP CR-1: Evaluation and Protection of Discovered Resources. In the event that archaeological resources are exposed during construction, all earth disturbing work within the vicinity of the find shall be temporarily suspended or redirected until a professional archaeologist has been retained to evaluate the nature and significance of the find pursuant to a Phase 2 investigation. The RRWMD shall be notified immediately of any such find. The find shall be appropriately documented through a Phase 3 data recovery program and/or avoided if deemed necessary by a qualified archaeologist.

If human remains are unearthed, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the NAHC.

Plan Requirements and Timing. The above measures shall be reflected in the contract specifications for the Resource Recovery Project and shall be implemented if evidence of cultural resources are observed during project-related earth disturbing activities.

Monitoring: RRWMD shall monitor for compliance.

Residual Impacts. Implementation of this mitigation measure would reduce cultural resources Impact TRRP CR-1 associated with implementation of the proposed project to a level of less than significant.

Relocated Landfill Facilities

Operations facilities (primarily portable offices) may be temporarily relocated during the project construction period to an area north of the landfill top deck or to the southern portion of the landfill. Landfill equipment maintenance facilities would be relocated to the area north of the landfill top deck (see Figure 3-4). Cultural resources have not been found in the vicinity during previously completed archeological field surveys in the area. These facilities would be located within previously disturbed areas; therefore, discovery of cultural resources is not anticipated. Overall, no impacts to cultural resources would occur as a result of operation of relocation of landfill facilities.

4.6.2.5 Proposed Tajiguas Resource Recovery Project with Optional Comingled Source Separated Recyclables (CSSR) Component

The optional CSSR element would increase the building footprint of the MRF by approximately 10,000 square feet. This increase would occur within the proposed disturbance footprint of the project in areas constructed on engineered fill. No resources are recorded or expected to occur in these previously disturbed areas. Additionally, the number of employees on the site would increase by 20 during the day and there would be additional deliveries of recyclable materials and transport of sorted materials off-site after processing. These activities would occur within the same project footprint, with no increase in ground disturbance. Therefore, implementation of the optional CSSR element would not increase project-related impacts to cultural resources.

4.6.2.6 Extension of Landfill Life Impacts

Impact TRRP CR-2: Project-related extension of the life of the Tajiguas Landfill would extend indirect impacts to archeological sites further in time – Class II Impact.

As discussed in Section 3.4, project-related diversion of recyclable material and organic waste is anticipated to extend the life of the Tajiguas Landfill by about 10 years. This effect would not involve any ground disturbance at the landfill site beyond what was been previously analyzed and permitted. The majority of the ground disturbance associated with construction of the remaining landfill disposal cells will occur prior to implementation of the proposed Resource Recovery Project, but with implementation, the rate of disposal in these constructed cells would be significantly reduced and delay overall closure of the landfill site. Therefore, CA-SBa-1990 and SBA-iso-645 may continue to be indirectly impacted through landfill operation (continued presence of landfill staff) and landfill closure activities. These impacts were considered significant, but mitigable (Class II) with the implementation of cultural resource training program for landfill staff, additional archeological investigation if these sites are impacted by closure or post-closure activities, and stopping or redirecting work if resource are discovered. These existing mitigation measures would continue to be applicable to the landfill over its extended life and no new landfill associated impacts to cultural resources would occur.

4.6.2.7 Decommissioning Impacts

Removal of project facilities (buildings, percolate tanks, bio-filters, buried pipelines, etc.) would occur within the construction disturbance area as shown in Figure 3-14. Therefore, no additional ground disturbance would be required that may encounter cultural resources. Any cultural resources found during construction would have been assessed and mitigated (if appropriate) as required under **Impact TRRP CR-1** and ***MM TRRP CR-1***. Therefore, no additional cultural resources impacts would occur.

4.6.2.8 Cumulative Impacts of the Tajiguas Resource Recovery Project

The proposed project may incrementally contribute to cumulative impacts to cultural resources when considered with other planned projects in the region (see Section 3.6).

Impact TRRP CR-CUM-1: Ground disturbance associated with the proposed project combined with disturbance associated with the cumulative projects could result in significant disturbance of unreported cultural resources – Class II Cumulative Impact; Project Contribution – Not Considerable with Mitigation (Class II).

The project region (Gaviota coast) provides abundant resources for pre-historic human populations and includes numerous archeological sites, as indicated by 14 sites located within 0.5 miles of the landfill site (Conejo Archeological Consultants, 2008), and over 240 pre-historic and historic archeological sites identified within the Gaviota Coast Plan Area (Santa Barbara County, 2013).

Significant impacts to archeological sites would occur as a result of the ~~Las Varas/Edwards Ranch and~~ Paradiso del Mare project~~s~~, and indirect impacts to known sites would occur at Santa Barbara Ranch. In addition, these and other cumulative projects listed in Section 3.6 have the potential to disturb unreported cultural resources in the region.

The importance of cultural resources that may be discovered during implementation of these projects is unknown; therefore, the significance of such impacts cannot be determined. Given the cultural sensitivity of the area, most of these cumulative projects would also include measures requiring ground disturbing activities to be stopped or redirected if resources are discovered. However, such impacts are considered potentially significant for the purposes of this Subsequent EIR.

The proposed project would not contribute to any cumulative impacts associated with recorded cultural resource sites and with implementation of site-specific cultural resource measures ***MM TRRP CR-1***, the project's contribution to potentially significant impacts to unreported cultural resources in the region would not be cumulatively considerable.