5.14 Tribal Cultural Resources

CEQA Guidelines Appendix G, Environmental Checklist, has been expanded to include Tribal Cultural Resources. Similar to Cultural Resources, included herein as Section 5.4, this section discusses impacts to cultural resources directly related to Native American tribal cultures that populated the area where the Project is located. The distinction for Tribal Cultural Resources is that they are described as a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place or object with cultural value to a California Native American Tribe. Cultural Resources are generally considered as archaeological or paleontological resources which are typically beneath the surface of the ground and are discovered or uncovered through disturbance of the site. The potential tribal cultural resources impacts associated with the proposed Project are identified and discussed herein.

Information in this section is based on information provided by, as well as an Archaeological Inventory Survey (Archaeological Survey) prepared by, Genesis Society dated August 30, 2017. The report in its entirety is included herein as Appendix G. Where general information is applicable to both Cultural Resources (Section 5.4) and this section, the reader will be referred to Section 5.4 for additional detail.

5.14.1 Existing Conditions

The proposed Project is located within a portion of the Tulucay Ranch Land Grant as shown on Exhibit 5.14-1, USGS Napa, California, 7.5’ Series Quadrangle. The area of potential effect (APE) for the Archaeological Survey is the entire 11.5-acre Project site. The elevation within the APE averages 20 feet above mean sea level (AMSL) and no naturally occurring sources of surface water are located within the APE.

The area lies within the Coast and Interior Coast Ranges, near the terminal intersection of the southwestern terminus of the Vaca Mountains and the San Pablo Bay delta region. The APE is situated on relatively flat terrain adjacent to rolling hills that comprise the foothills that form the eastern margin of the Napa River. More detailed descriptions of the dominant features of the area are found Section 5.14.4 (beginning on page 5.14-8).

Exhibit 5.14-2, California Tribal Homelands Map, identifies the Native American tribes and their geographic locations throughout the state.
Exhibit 5.14-1 USGS Napa, California, 7.5’ Series Quadrangle

Source: Figure 3, Archaeological Inventory Survey; Sean Michael Jensen, M.A.; August 30, 2017 (Appendix G to this EIR)
Chapter 5 – Environmental Setting, Impacts, and Mitigation Measures

5.14 – Tribal Cultural Resources

Source: Archaeological Inventory Survey (Appendix G to this EIR)

Exhibit 5.14-2  California Tribal Homelands Map
Historic Background

The archaeological record of the San Francisco Bay Area has typically fallen into two systems:

- The Early-Middle-Late Period nomenclature known as the Central California Taxonomic System
- The Archaic-Emergent temporal structure

The Archaic period is divided into three sub-periods: the Lower Archaic (8,000 BP to 5,000 BP), the Middle Archaic (5,000 BP to 1,500 BP), and the Upper Archaic (2,500 BP to 1,000 BP). Overall, Archaic occupants continued to practice relatively high geographic mobility but with an increase in permanent/semi-permanent resource procurement bases. The range of resources increases during this period, as evidenced by the diversity of artifacts, including the addition of milling stone tools and obsidian and chert concave-based projectile points. The Middle Archaic witnesses the introduction of the bowl mortar, further supporting the intensification of across as a subsistence resource. The increase in geographical/resource diversity, along with an expanding population during the Upper Archaic, contributed to an increase in the number of permanent settlements and additional complexities in the cultural manifestations.

During the Emergent period, the archeological record became more complex as specialized adaptations to locally available resources were developed and populations expanded. Further, interactions with cultures from the Sacramento Valley, the Delta and the San Francisco Bay regions resulted in numerous cultural changes for the North Coastal region inhabitants. Many sites dated to this time period contain mortars and pestles and/or are associated with bedrock mortars. The range of subsistence resources utilized along with reginal exchange systems expanded significantly. Archeological evidence of social stratification and craft specialization is indicated by well-made artifacts such as charmstones and beads, often found as mortuary items.

5.14.2 Regulatory Setting

1. State Laws and Regulations

California Environmental Quality Act

CEQA states that it is state policy to: “take all action necessary to provide the people of this state with . . . historic environmental qualities.” CEQA requires detailed studies that analyze the environmental effects of a proposed project. In the event that a project is determined to have a potential significant environmental effect, the Act requires that alternative plans and mitigation measures be considered. CEQA includes historic, archaeological and paleontological resources as integral features of the environment. If such resources are identified as being within the proposed Project study area, the sponsoring agency must take those resources into consideration when evaluating project effects. The level of consideration may vary with the importance of the resource.
California Register of Historical Resources

The Register is a listing of all properties considered to be significant historical resources in the state. These include all properties listed or determined eligible for listing on the National Register, including properties evaluated under Section 106, and State Historical Landmarks. The criteria for listing are the same as those of the National Register. The California Register statute specifically provides that historical resources listed or determined eligible for listing on the California Register by the State Historical Resources Commission, or resources that meet the California Register criteria are resources which must be given consideration under CEQA.

Resources eligible for listing include buildings, sites, structures, objects or historic districts that retain historic integrity and are historically significant at the local, state or national level under one or more of the following criteria:

- It is associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States;
- It is associated with the lives of persons important to local, California or national history;
- It embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values; or
- It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

Resources must retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. A resource that has lost its historic character or appearance may still have sufficient integrity for the California Register, if, under criterion 4, it maintains the potential to yield significant scientific or historical information or specific data.

California Public Resources Code §21074

(a) Tribal Cultural Resources are either of the following:

1) Sites, features, places, cultural landscapes, sacred places and objects with cultural value to a California Native American tribe that are either of the following:
   a) Included or determined to be eligible for inclusion in the California Register of Historical Resources.
   b) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.
(b) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

(c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “nonunique archeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

California Public Resources Code §21084.1

A project 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. For purposes of this section, an historical resource is a resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources. Historical resources included in a local register of historical resources, as defined in subdivision (k) of §5020.1, or deemed significant pursuant to criteria set forth in subdivision (g) of §5024.1, are presumed to be historically or culturally significant for purposes of this section, unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant. The fact that a resource is not listed in, or determined to be eligible for listing in, the California Register of Historical Resources, not included in a local register of historical resources, or not deemed significant pursuant to criteria set forth in subdivision (g) of §5024.1 shall not preclude a lead agency from determining whether the resource may be an historical resource for purposes of this section.

Assembly Bill 52

In September 2014, legislation was enacted that imposes new requirements for consultations regarding projects that may affect a tribal cultural resource and includes a list of recommended mitigation measures. AB 52 states that tribal cultural resources must meet the following:

1. Included or determined to be eligible for inclusion in the California Register of Historical Resources
2. Included in a local register of historical resources
3. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in PRC Section 5024.1
4. A cultural landscape that meets one of the above criteria and is geographically defined in terms of the size and scope of the landscape
5. A historical resource described in PRC 21084.1, a unique archaeological resource described in PRC 21083.2 or a non-unique archaeological resource if it conforms to the above criteria

Under AB 52, a project that may cause a substantial adverse change in the significance of a tribal cultural resource is defined as a project that may have a significant effect on the environment. Where a project may have a significant impact on a tribal cultural resource, the
lead agency’s environmental document must discuss the impact and whether feasible alternatives or mitigation measures could avoid or substantially lessen the impact.

Lead agencies are to provide notice to tribes traditionally or culturally affiliated with the geographic area of the proposed Project that may have expertise with regard to their tribal history and practices. Tribes can request consultation which may include discussing the type of environmental review necessary, the significance of the tribal cultural resources, the significance of the project’s impacts on the resource and the alternatives and mitigation measures recommended by the tribe.

Mitigation measures agreed upon during consultation must be recommended for inclusion in the environmental document. AB 52 also identifies mitigation measures that may be considered to avoid significant impacts if there is no agreement on appropriate mitigation. Recommended measures include:

- Preservation in place
- Protecting the cultural character and integrity of the resource
- Protecting the traditional use of the resource
- Protecting the confidentiality of the resource
- Permanent conservation easements with culturally appropriate management criteria
- Local Regulations/Ordinances

The City of Napa General Plan - Envision Napa 2020 - includes a chapter entitled Historic Resources which identifies policies for the preservation of cultural resources as follows:

- HR-6.1 - The City shall enforce current federal and state and procedure for identifying, preserving and protecting prehistoric sites.
- HR-6.2 - The City shall require investigation during the planning process for all proposed developments in archaeologically sensitive areas in order to determine whether prehistoric resources may be affected by the project and, if so, require that appropriate mitigation measures be incorporated into the project design.
- HR-6.3 - Recognizing that Native American burials or archaeological artifacts may be encountered at unexpected locations, the City shall continue to enforce state mandates with its current mitigation requirement, applied to all development permits and tentative subdivision maps, that upon discovery of remains during construction, all activity will cease until qualified professional archaeological examination and reburial in an appropriate manner is accomplished.

5.14.3 Thresholds of Significance

Thresholds of significance for evaluation of the proposed Project’s impacts are based on the County of Napa Environmental Checklist and the CEQA Environmental Checklist (Appendix G of the CEQA Guidelines). Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and
scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Per CEQA, an archaeological resource is considered “unique” (Section 21083.2(g)) when the resource not merely adds to the current body of knowledge, but when there is a high probability that the resource also:

- Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information,
- Has a special and particular quality such as being the oldest of its type or the best available example of its type,
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

A project may have a significant impact or adverse effect on cultural resources/historic properties if the project will or could result in the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance or values of the resource would be materially impaired.

5.14.4 Project Impacts Prior to Mitigation

The Archaeological Survey includes a detailed explanation of the prehistoric and historic setting of the Project site and area generally. As noted, the entire report is included herein in Appendix G. Following is a summary of the historical information as well as the results of the pedestrian survey of the Project site conducted by Sean Jensen of Genesis Society. The specific tasks performed by Genesis Society in compliance with CEQA requirements and guidelines follow:

- Conduct a records search at the Northwest Information Center of the California Historical Resources Information System and consult with the Native American Heritage Commission. The goals of the records search and consultation were to determine (a) the extent and distribution of previous archaeological surveys, (b) the locations of known archaeological sites and any previously recorded archaeological districts and (c) the relationships between known sites and environmental variables.

- Conduct a pedestrian survey of the APE in order to record and evaluate any previously unidentified cultural resources. Based on map review, a complete coverage, intensive survey was conducted given the presence of moderate to high archaeological sensitivity within the property. The purpose of the pedestrian
survey was to ensure that any previously identified sites are relocated and evaluated in relation to the present project/undertaking.

- Preparation of a Final Report identifying Project effects and recommending appropriate mitigation measures for sites that might be affected by the undertaking and that are considered significant or potentially significant per CEQA and/or eligible or potentially eligible for inclusion on the California Register of Historical Resources.

All field survey work followed guidelines provided by the State Historic Preservation Office (Sacramento) and conforms to accepted professional standards.

1. Ethnography

The Project area is located within territory claimed by the Southern Patwin near the border shared with the Coast Miwok at the time of initial contact with European/American culture. The territorial boundaries of the Patwin are described as extending along the Sacramento River from the town of Princeton to the San Pablo and Suisun bays, abutting the Pomo and Wappo to the west.

The basic social unit for the Patwin was the family, although the village may also have functioned as a social, political and economic unit. Villages were usually located near water sources, with major villages inhabited mainly in the winter as it was necessary for at least some of the population to relocate into the hills and higher elevation zones to establish temporary camps during food gathering seasons (i.e., spring, summer and fall). Villages typically consisted of a variable number of bark houses, numbering from four or five to several dozen in larger villages such as the large village once situated to the north, in Napa, with each house containing a single family of from three to seven people.

As with all northern California Indian groups, economic life for the Patwin revolved around hunting, fishing and the collecting of plant foods. Deer was an important meat source and the animals were hunted by individuals by stalking or snaring, or by groups in community drives. Salmon runs, and other food resources available along the Napa River and its major tributaries, also contributed significantly to local economies. While much of the fish protein was consumed immediately, a significant percentage, particularly during the fall salmon run, was prepared for storage and consumed during winter months. Acorns represented one of the most important vegetal foods and were particularly abundant within the Oak Park Woodland which once dominated lands within the study area along the Napa River, and in association with higher ground and natural stream courses both east and west of Napa.

The ceremonial chief directed the entire tribelet's Kuksu Cult, a religious cult and secret society that performed tribal initiations, ghost ceremonies and curing ceremonies (Kroeber 1907). The Patwin were documented by Asians and Europeans as early as the late 16th century, and their populations remained relatively stable until the incursion of Spanish settlers and missionaries during the latter portion of the 18th century. The indigenous populations at this time were “missionized” and relocated to various missions south of their traditional territory. Due to “missionization,” inter-tribal marriages became more common, and new missions were established throughout the tribe's traditional lands.
Mexico gained independence from Spain in 1821, and the Mission Period officially ended in 1834. The newly established secular government resulted in the Patwin being freed from the Franciscan missionaries, only to find themselves serving new, land-grant masters. In 1837, a smallpox epidemic resulted in the deaths of a substantial portion of the native population in Napa County, and subsequent epidemics continued to erode their population.

2. Historic Setting

Interior California was initially visited by Anglo-American fur trappers, Russian scientists, and Spanish-Mexican expeditions during the early part of the 19th Century. These early explorations were followed by a rapid escalation of European-American activities, which culminated in the massive influx fostered by the discovery of gold at Coloma in 1848. Early Spanish expeditions arrived from Bay Area missions as early as 1804, penetrating the northwestern San Joaquin Valley (Cook 1976). By the mid-1820s, hundreds of fur trappers were annually traversing the Valley on behalf of the Hudson’s Bay Company (Maloney 1945). By the late 1830s and early 1840s, several small permanent European-American settlements had emerged in the Central Valley and adjacent foothill lands, including Ranchos in the interior Coast Range, and of course the settlement at New Helvetia (Sutter’s Fort) at the confluence of the Sacramento and American Rivers (Sacramento).

With the discovery of gold in the Sierra Nevada, large numbers of European-Americans, Hispanics, and Chinese arrived in and traveled through the Valley. The Valley’s east-side mining communities’ demands for hard commodities led quickly to the expansion of ranching and agriculture throughout the Great Central Valley and the interior valleys of the Coast Range. Stable, larger populations arose and permanent communities slowly emerged in the Central Valley, particularly along major transportation corridors.

The present APE is located within Napa County, which is one of California’s original counties. The County’s first courthouse and seat of government was established in Napa in 1851. Napa, itself, was founded in 1847 by Nathan Coombs who had received the future town site property from Nicolas Higuera, the original holder of the Rancho Entre Napa Mexican land grant.

The onset of the gold rush resulted in an influx of population to the region as miners and their families sought a refuge from the harsh Sierra Nevada winters. However, in 1858, the great silver rush began in the Napa Valley, and miners flocked the region. Mining continued to expand throughout the 1860s, and by 1872, Napa was incorporated. The Napa State Asylum for the Insane, located north of the present APE, was opened in 1876, and the Napa Valley Opera House opened in 1880.

Early settlers into the county cultivated fruits and vegetables for local consumption and grains were grown on a larger scale for exportation. Dry farm crops such as wheat and oats, used for cattle fodder, proved profitable in the area despite limited irrigation. Initially, agricultural products were transported via the waterways but with the completion of California Pacific Railroad, connecting directly with the Transcontinental Railroad in 1869, goods were transported by rail.
While agriculture dominated the northern portion of the county, banking and business enterprises intensified within the City of Napa. Among these businesses were leather workers and some of the early electronic technology efforts that ultimately led to the foundation of Magnavox Company in 1917. While these endeavors continued throughout the 20th century, concerns for regional flooding became an important theme that continues to the present day.

3. Record Searches/Sources Consulted

Several types of information were considered relevant to evaluating the types of archaeological sites and site distribution that might be encountered within the Project area. The information evaluated prior to conducting the pedestrian survey includes data maintained by the Northwest Information Center, and available published and unpublished documents relevant to regional prehistory, ethnography, and early historic developments.

Northwest Information Center Records

The official Napa County archaeological records were examined on August 15, 2017 (NWIC File No. 17-0316). These records document the following existing conditions for a one-eighth mile radius of the APE:

- According to the information center, the existing APE has been subjected to archaeological survey as a result of two previous investigations. Gerry (1978) conducted a linear survey, which included the eastern portion of the present APE (S-001200). Salzman (1981) conducted an archaeological survey for the Napa Industrial Park project which involved approximately 246-acres, including the existing APE (S-2547). Five (5) archaeological investigations have been conducted on lands within 1/8-mile of, the present APE: S-21260, 47936, 38004, 13188 and 13025. However, there appears to be no overlap of these previous investigations with the present APE configuration. Additionally, thirteen (13) reports, located within the search radius, are classified as Other Reports. These reports involved little or no fieldwork, or are missing maps.

- According to the Information Center’s records, no cultural resources have been formally documented within the subject APE. One resource (P-28-001212), a rock wall fence, has been documented within the search radius, but outside of the present APE. This site was recommended and determined not eligible/significant, and was subsequently destroyed.

AB 52 - Native American Consultation

The City of Napa initiated consultation communications with the Yocha Dehe Wintun Nation on June 29, 2017, via letter, and the Tribe responded, via letter, on July 18, 2017, indicating that the Project is located within traditional Yocha Dehe lands, and requesting copies of any archaeological investigations prepared in conjunction with this Project.

Initial consultation, with the Native American Heritage Commission (NAHC), for the Project was undertaken by the City of Napa. On August 4, 2017, the NAHC responded to
the City of Napa with a five-page letter outlining various laws, codes and ordinances. The NAHC letter did not indicate that a search of their Sacred Lands Files (SLF) had been undertaken, nor was there an appended list of “Native American Contacts.” The City of Napa has completed the requirements for Native American consultation under AB 52 and no additional consultation is required.

Additional Sources

Genesis Society initiated consultation with the NAHC regarding sacred land listings for the property via an information request letter that was delivered to the NAHC on August 9, 2017. The NAHC responded on August 18, 2017, indicating that “Sacred Sites and Tribal Cultural Resources were identified in the project area provided.” The NAHC advised contacting Chairman Scott Gabaldon of the Mishewal-Wappo Tribe of Alexander Valley to obtain additional information concerning this data. As noted in this DEIR, the Project is within traditional Yocha Dehe Winton Nation lands and the City has sent Project information to the tribal contact for Yocha Dehe. The Mishewal-Wappo Tribe has not requested placement on the City’s contact list.

In addition to examining the archaeological site and survey records of Napa County maintained at the Northwest Information Center, the following sources were also included in the search conducted at the Information Center, or were evaluated separately:

- The National Register of Historic Places (1986, Supplements)
- The California Register of Historical Resources
- The California Inventory of Historic Resources (State of California 1976)
- The California Historical Landmarks (State of California 1996)
- The California Points of Historical Interest (May 1992 and updates)
- The Historic Property Data File (OHP 2014)
- California Place Names (Gudde 1969)
- Napa 7.5' Quadrangle (1951, Photorevised 1980)
- 1859 Tulucay Rancho Map
- 1863 GLO, T5N, R4W
- 1895 O.H. Buckman Map
- 1916 USGS Mare Island Quadrangle
- Existing published and unpublished documents relevant to prehistory, ethnography, and early historic developments in the vicinity. These sources, reviewed below, provided a general environmental and cultural context by means of which to assess likely site types and distribution patterns for the project area.

4. Survey Methods/Results

The following information is applicable to both the Cultural Resources and Tribal Cultural Resources sections.
The entire APE was subjected to intensive pedestrian survey by means of walking systematic transects, spaced at 20-meter intervals. In searching for cultural resources, the surveyor took into account the results of background research and was alert for any unusual contours, soil changes, distinctive vegetation patterns, exotic materials, artifacts, feature or feature remnants and other possible markers of cultural sites.

Fieldwork was undertaken on August 27, 2017 by Sean Michael Jensen and Sutter Jensen. Mr. Jensen is a professional archaeologist, with 31 years’ experience in archaeology, history and architectural history, who meets the Secretary of Interior’s Standards for Professional Qualification, as demonstrated in his listing on the California Historical Resources Information System list of qualified archaeologists and historians. No special problems were encountered, and all survey objectives were satisfactorily achieved.

Fieldwork identified the following general conditions within the APE. The majority of the APE has been subjected to intensive disturbance as a result of past demolition, grading, and re-contouring. Examination of the both the USGS and Aerial images provided by NETR did provide a visual historic context for the APE, which is listed and summarized below.

**USGS Maps**
- 1942 Two structures present in southeast corner (one residence, one barn), railroad present along eastern boundary
- 1952 Two structures present in southeast corner (one residence, one barn)
- 1958 Structure present in southeast corner
- 1963 Two structures present in southeast corner (one residence, one barn)
- 1966 Structure present in southeast corner
- 1967 Vacant
- 1969 Two structures present in southeast corner (one residence, one barn)
- 1975 Two structures present in southeast corner (one residence, one barn)
- 1980 Vacant
- 1982 Vacant
- 1984 Structure present in southeast corner

**Aerial Maps**
- 1948 Structures present within the extreme southeast property corner
- 1968 Vacant, demolition scars evident within the southeast property corner
- 1993 Vacant
- 2002 Vacant
- 2005 Vacant
- 2009 Vacant
- 2010 Vacant
- 2012 Vacant

The evidence gleaned from the USGS quadrangles and aerial photographs demonstrate that a small complex, likely a family farm/ranch existed within the southeastern portion of the present APE prior to 1949, and that by 1968 the entire complex had been razed. Over the
subsequent decades, the entire APE, and surrounding lands, were subject to intensive
disturbance associated with adjacent commercial development.

According to the Northwest Information Center, no prehistoric or historic-era sites have been
documented within the APE. In addition, no prehistoric or historic-era sites were identified
during the pedestrian survey conducted in August 2017.

5. Conclusion
The proposed Project would not cause a substantial adverse change in the significance of a
tribal cultural resource. The results of the Archaeological Survey analysis indicate there are
no known archaeological or built environment historic resources within the Project area. The
Project area is considered to have low sensitivity for prehistoric and historical archaeological
deposits because a records search and pedestrian survey failed to identify any significant
historical resources or unique archaeological resources within the APE. While no impacts are
identified, a City Standard Mitigation Measure has been included in Section 5.4 – Cultural
Resources – that will protect any resources found during Project construction. No additional
mitigation is recommended as the Project site does not meet the threshold criteria
established by CEQA for Tribal Cultural Resources. There will be no significant impact on
tribal resources due to Project implementation.

5.14.5 Mitigation Measures
The City’s Policy Resolution No. 27 provides standard mitigation measures for potential
environmental impacts to cultural resources. Mitigation Measures MM CR-1 through
MM CR-3 in Section 5.4 will ensure that all cultural resources will be protected, and no
additional mitigation measures are required for tribal cultural resources.

5.14.6 Level of Significance after Mitigation
Thresholds of significance identified in the CEQA Guidelines, Appendix G, state the Project
would have a significant impact if it would:

a) Cause a substantial adverse change in the significance of a tribal cultural resource,
defined in Public Resources Code Section 21074 as either a site, feature, place,
cultural landscape that is geographically defined in terms of the size and scope of the
landscape, sacred place or object with cultural value to a California Native American
tribe.

The Archaeological Survey concludes that the proposed Project will not cause a substantial
adverse change in the significance of a tribal cultural resource. Based on the absence of any
contributing components of any significant historical resources/unique archaeological
resources within the APE, archaeological clearance is recommended for the Project as
presently proposed.

The proposed Project, with Mitigation Measures MM CR-1 through MM CR-3, is consistent
with the Historic Resources Chapter of the City of Napa General Plan because any discovered
cultural resources within the Project site will be identified, evaluated and preserved.
The proposed Project is not eligible for listing in the California Register of Historical Resources or a local register of historical resources. The City, as lead agency, has not identified a tribal cultural resource on the Project site pursuant to criteria in Public Resources Code §5024.1. With implementation of the recommended mitigation measures contained in Section 5.4, any Project impacts to cultural resources will be reduced to a less than significant level.

5.14.7 Cumulative Impacts

Development of the proposed Project will not significantly impact tribal cultural resources within or adjacent to the Project boundaries. Individual Project impacts are evaluated and mitigated on a project-by-project basis. Project development in combination with other area projects would not considerably contribute to the alteration any regional or cumulative tribal cultural, scientific or historic resources. The proposed Project would not result in a cumulative impact.

5.14.8 Unavoidable Adverse Impacts

No impacts to tribal cultural resources have been identified on the Project site and none will result from Project implementation. Therefore, there are no unavoidable adverse impacts to tribal cultural resources associated with the development of the proposed Project.