

3.5.1 Introduction

Cannabis cultivation and manufacturing may result in environmental impacts to cultural resources, including the damage or degradation of historic resources and buildings, tribal cultural resources, and subsurface archeological or paleontological resources. This section identifies and evaluates issues related to cultural resources that could result from the Project and More Permissive Project scenarios of the Commercial Cannabis Cultivation and Manufacturing Regulations and Licensing Program (Program).

This section is based on information from the Santa Cruz County General Plan Conservation and Open Space Element, Santa Cruz County Native American Cultural Sites Ordinance, Santa Cruz County Paleontological Resource Protection Ordinance, Santa Cruz County Historic Preservation Ordinance, Santa Cruz County Zoning Ordinance, previous archaeological studies, review of the California Inventory of Historic Resources for Santa Cruz County, a cultural resources records search of the Northwest Information Center (NWIC) of the California Historical Resources Information System (CHRIS) at Sonoma State University, and outreach to tribal representatives through the Native American Heritage Commission (NAHC). The cultural resources evaluation is included as Appendix H of this EIR.

Program Impact Analysis *At a Glance*

The Program could adversely affect historic buildings and cultural/tribal resources from ground disturbance or reuse of buildings older than 50 years. County regulations for cultural resources and mitigation to protect historic structures would ensure direct and indirect impacts are less than significant. However, project-induced additional or expanded unlicensed cannabis activities could have significant and unavoidable impacts.

3.5.2 Environmental Setting

Cultural resources are defined as significant or unique historic-period buildings, structures, districts, and objects; archeological sites dating from either the prehistoric or historic period; or paleontological (i.e., fossil) materials. The potential exists for undiscovered subsurface prehistoric archaeological or paleontological resources throughout the County of Santa Cruz (County) in areas of potential cultivation under the Program. Resources are most likely associated with areas of known historic habitation, such as the areas surrounding the City of Santa Cruz and the City of Watsonville, though prehistoric habitation is documented throughout habitable areas of the County. As detailed in Appendix H, the County has a rich history of habitation dating back 8,500 to 10,000 years ago, and included the region's first known habitants, the Ohlone or Costanoan, beginning in approximately 6,000 Before Present (B.P.). Native habitation extended through European exploration periods beginning in 1769 with the first Portola expedition and establishment of the Mission La Exaltacion de la Santa Cruz in 1791. Settlers claimed land in the County through the 1800s as part of the state's Gold Rush and expansion of ranching and American industrialization, including shipping, commercial agriculture, and tourism. Agriculture also expanded rapidly in coastal bluff areas and the rich soils of the Pajaro Valley, which supported the growth of agricultural economies supported by landowners

and immigrant populations cultivating berries, apples, and row crops. Additional details of the evolution and development of prehistoric cultures and early American establishment in the County are described in Appendix H.

3.5.2.1 History of Cannabis Cultivation in Santa Cruz County

The following summary describes the history of cannabis cultivation in the County; as described above, a summary of the cultural setting for the prehistory, ethnography, and history of the County is detailed in Appendix H.

Cannabis cultivation has been documented in the County for more than 40 years, though cultivation likely occurred earlier as well. The majority of cannabis cultivation occurred within small discrete operations within private residences, garages, or small gardens (County of Santa Cruz 2017a). Hippie communes were another common source of cannabis during the 1960s in the County; this included Ben Lomond's Holiday Cabins commune in the San Lorenzo Valley (Good Times Santa Cruz 2016).



Ben Lomond's Holiday Cabins commune in 1967-1968 was a known location of cannabis cultivation. Source: Good Times Santa Cruz 2016.

The County was one of the first jurisdictions to legalize cannabis for medical use with voter approval of Measure A in 1992, and was home to the second medical marijuana club in the world with the opening of the Santa Cruz Cannabis Buyers Club in April 1995 (Marijuana 2014). With the passage of Measure A, the Wo/Men's Alliance for Medical Marijuana (WAMM) was founded in 1993 and is the nation's oldest continuously operating medical cannabis collective; the founders of WAMM originally began cultivating cannabis for medicinal uses in the 1970s (WAMM 2017). With the implementation of California Proposition 215 in 1996, cannabis cultivation for medical uses became legalized and the cannabis industry in the County began to grow.¹ Cannabis



Founded in 1993, the Wo/Men's Alliance for Medical Marijuana (WAMM) still operates today. Source: WAMM 2017.

operations became larger over time, and some cultivators began to develop specific strains of cannabis to increase the amount of tetrahydrocannabinol (THC) or cannabidiol (CBD) in response to a growing body of research on effectiveness of cannabis for medicinal purposes, as well as medical user demands. Cultivators also began to distribute cannabis products through dispensaries as an alternative to cannabis collectives (County of Santa Cruz 2017a).

¹ California Proposition 215 in 1996, also known as the Medical Use of Marijuana Initiative, exempts patients who possess or cultivate cannabis for medical treatment recommended by a physician from criminal laws which otherwise prohibit possession or cultivation of cannabis, and allows physicians to recommend use of cannabis for medical treatment.

3.5.2.2 Identified Cultural Resources in Santa Cruz County

Historic Built Environment Resources

Historic resources include buildings, structures, and objects of historic or aesthetic importance that amplify the local population's sense of community, enhance perceptions and enjoyment of the community, and provide an important measure of the physical quality of life. When a significant concentration of such resources occurs within a defined geographic space, a historic district may be defined.

To identify historic resources in the County, data from the NWIC records search was reviewed, as well as the County of Santa Cruz Historic Resource Inventory (HRI) and the Office of Historic Preservation's (OHP's) County of Santa Cruz's Designated California Historical Landmarks (CHL) list.

Historic Resources within the County

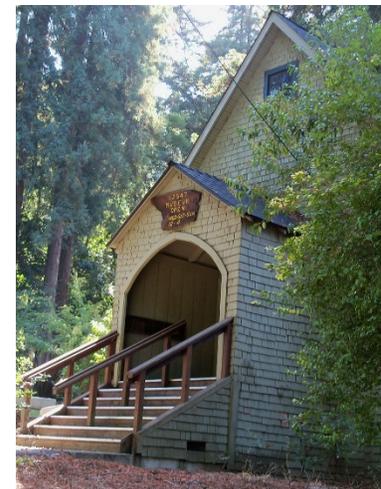
There are 47 historic properties and districts in Santa Cruz County listed on the National Register of Historic Places (NRHP), including 2 National Historic Landmarks (NHLs). The NRHP is the official list of districts, sites, buildings, structures, and objects deemed worthy of preservation by the Secretary of the Interior. NHLs are designated nationally significant historic places because they possess exceptional value or quality in illustrating or interpreting the heritage of the U.S. One designated NHL is located in the unincorporated County, namely the California Powder Works Bridge (National Park Service 2016). Built in 1872, the Powder Works Bridge spans the San Lorenzo River in the San Lorenzo Valley. The Powder Works Bridge was an essential component of the California Powder Works, the first black powder mill on the West Coast, and is an example of nineteenth-century covered bridge construction and a Smith truss, a nationally-significant timber bridge type (National Park Service 2013). The bridge became a dedicated NHL in 2015.

CHLs are buildings, structures, sites, or places that have been determined to have statewide historical significance. There are eight designated CHLs in the County, including the unincorporated historic town of Glenwood, Felton Covered Bridge, Big Basin Redwoods State Park, and the Castro Adobe. More details on these CHLs are provided in Appendix H (Office of Historic Preservation 2017).

Historic resources in the unincorporated areas of the County are protected through the implementation of the Santa Cruz County Historic Preservation Ordinance (refer to Section 3.5.3.2 – Santa Cruz County Code [SCCC] Chapter 16.42). County Planning staff maintains the HRI, a listing of all officially designated historic resources in the County. Parcels that are designated in the



The Powder Works Bridge, built in 1872, spans the San Lorenzo River in the San Lorenzo Valley. The bridge became a National Landmark in 2015 due largely to its use of a Smith truss, a nationally noteworthy timber truss type developed by Robert W. Smith.



Grace Episcopal Church, built in November 1906, is currently the oldest religious structure in Boulder Creek. The building was listed on the National Register of Historic Places in 2016 and currently houses the Boulder Creek Historical Society.

County's Historic Landmark L Combining District (refer to Section 3.5.3.2 – SCCC Chapter 13.10) are considered historic resources in the HRI. There are currently 264 parcels within the Historic Landmark L Combining District; this list is located in Appendix H. Properties which are listed on the NRHP and the CHL are also included in the County's HRI and are protected under SCCC Chapter 16.42.

Archaeological and Tribal Cultural Resources

Archaeological resources represent and document activities, accomplishments, and traditions of previous civilizations and link current and former inhabitants of an area. Archaeological resources may date from the historic or prehistoric period, and include deposits of physical remains of the past such as artifacts, manufacturing debris, dietary refuse, and the soils in which they are contained, or areas where prehistoric or historic activity measurably altered the earth.

Detailed study of archaeological sites is the only method of gaining knowledge and understanding of prehistoric times. Many of the sites and the artifacts and remains in them are a sacred part of the heritage, religion, and culture of the Native American community. As archaeological sites are among the most fragile, nonrenewable resources in California, various laws and regulations require the development of property to be accompanied by a rational and respectful concern for the protection of cultural resources (County of Santa Cruz 2017b).

The County also contains areas of great importance for the study and preservation of the past of the Native Americans of California. Native American cultural sites contain unique, irreplaceable resources significant to the history of the County and the cultural heritage of all humankind. Such sites have a deep, spiritual significance to all Native Americans, especially the native peoples of the State of California, and constitute a precious archaeological and historical heritage. It is the policy of the County to preserve and protect these sites and resources for their historic, cultural, educational, and scientific values. Native American cultural resources in the unincorporated areas of the County are protected through the implementation of the Santa Cruz County Native American Cultural Sites Ordinance (SCCC Chapter 16.40). This chapter establishes regulations for the protection, enhancement, and perpetuation of Native American cultural sites in order to promote the public welfare, and to implement the stated policies of the County's General Plan and Land Use Plan of the Local Coastal Program (LCP). Additionally, in February 2017, the County contacted Native American representatives to request consultation regarding tribal cultural resources for this EIR, consistent with AB 52. Following a 30-day comment period, the County did not receive a request for consultation. Nonetheless, this analysis addresses the potential tribal cultural resources to the extent feasible based on available information.

Archaeologic Potential of the County

Some areas of the County are more likely than others to contain undiscovered archaeological resources based on topography and geological conditions. Level to gently rolling hills near the coast or along water courses in the County are more likely to contain archaeological sites; however, because humans have occupied the County for at least 9,000 years (see Appendix H for a detailed prehistory of the County), dramatic changes in landforms may have occurred and archaeological sites may be found throughout the County (County of Santa Cruz 2017b). However, areas of archaeological sensitivity, or where there is a very high potential for a significant archaeological site to occur, are determined by an inventory of known sites in the County. These areas occur throughout the entire County, with large concentrations within the coast of the North Coast Region, a large cluster inland in the South County Region, near or surrounding waterways throughout the North Coast, Mountain, and

South County regions, and parts of the Urban Region. The total area of mapped archaeologically sensitive resource areas in the County is approximately 99,056 acres, or approximately 25.5 percent of the entire County (Santa Cruz County GIS 2017).

Additionally, staff of the NWIC at Sonoma State University performed a records search of the CHRIS on April 7, 2017 to identify known archaeological and historical sites within a 5-mile radius of two sample localities in the County: the Pajaro Valley and the San Lorenzo Valley (see Appendix H). As the Program applies to a large area covering unincorporated portions of the County, a Program-wide records search was not conducted; however, the NWIC records search was focused on the Pajaro Valley and the San Lorenzo Valley, where a large amount of cannabis cultivation is expected to occur under the Program, to characterize the potential for cultural resources to overlap with areas of potential commercial cannabis activities. The results of the literature and a records search indicate that at least 174 previous cultural resources studies have occurred within a 5-mile radius centered on two key areas of the County subject to the Program in San Lorenzo Valley and Pajaro Valley. Previous studies have identified 31 archaeological sites, including historic, prehistoric, and multicomponent archaeological sites, with some sites containing historic and prehistoric burials.

Paleontological Resources

Paleontological resources are the evidence of once-living organisms as preserved in the rock record. They include both the fossilized remains of ancient plants and animals and the traces thereof, such as trackways, imprints, and burrows. In general, fossils are older than recorded human history or greater than 5,000 years old and are typically preserved in sedimentary rocks. Although rare, fossils can also be preserved in volcanic rocks and low-grade metamorphic rocks under certain conditions (Society of Vertebrate Paleontology 2010).

Geology and Paleontology

The geologic setting is key to identifying potentially important paleontological resources in the County. As described in Section 3.6, *Geology and Soils*, the County is characterized by diverse topography, geologic features, and soils, and is located in the Coast Ranges physiographic province of California, which is characterized by low mountain ranges, generally parallel to the coast, that are underlain by granite and metamorphic basement rock types, bordered by two fault systems. Uplifted marine terraces characterize the coastline, which consist of sediments deposited below sea level. Please refer to Section 3.6, *Geology and Soils*, for a more complete description of regional geology.

Paleontological resources are contained within the geologic deposits or bedrock that underlie the soil layer. In order to ascertain whether a particular area has the potential to contain significant fossil resources at the subsurface, a review of relevant scientific literature, museum records, and geologic mapping to determine the geology and associated paleontology of the area was conducted. Significant valuable, irreplaceable paleontological resources exist in the County which may be degraded or destroyed by development activities. Policies to protect these resources for their scientific and educational values are contained in both the County General Plan and the LCP Land Use Plan, and SCCC Chapter 16.44 (Paleontological Resource Protection) establishes appropriate protective regulations and procedures. Specifically, seven areas within the County are likely to have rare or unique hydrological, geological, and paleontological resources related to their scarcity, scientific or educational value, aesthetic quality or cultural significance. The largest of these areas is located across the Mountain and Urban regions, situated between Lompico, Glenwood, and Scotts Valley. Another area is located within the North Coast and Urban regions, on the northwestern edge of the City of

Santa Cruz. The remaining five areas are all located within the North Coast Region, with two occurring close together north of Bonny Doon, and three located on marine terraces along the coast between Davenport and the City of Santa Cruz. The total area of mapped geologic paleontological resource areas in the County is approximately 6,161 acres, or approximately 1.6 percent of the entire County (Santa Cruz County GIS 2016). Additionally, the University of California Museum of Paleontology contains records for 679 paleontological localities in the County (Appendix H).

3.5.3 Regulatory Setting

This analysis was conducted in conformance with the goals and policies of federal, state, and local regulations. The following section summarizes the most applicable policies and regulations which would relate directly to future cannabis cultivation and cannabis product manufacturing under the Project and More Permissive Project and their associated impacts. Additional federal, state, and local policies and regulations are provided in Appendix A.

3.5.3.1 State

California Register of Historic Resources

The State of California Historical Resources Commission has designed the California Register for use by state and local agencies, private groups, and citizens to identify, evaluate, register, and protect California's historical resources. The California Register is the authoritative guide to the state's significant historical and archaeological resources.

Under California law, cultural resources are protected by California Public Resources Code (PRC) Section 5024.1, which established the California Register of Historical Resources. Section 5024 requires state agencies to provide notice to, and to confer with the State Historic Preservation Officer (SHPO) before altering, transferring, relocating, or demolishing state-owned resources.

The California Register program encourages public recognition and protection of resources of architectural, historical, archaeological, and cultural significance; identifies historical resources for state and local planning purposes; determines eligibility for state historic preservation grant funding; and affords certain protections under the California Environmental Quality Act (CEQA). The following criteria are utilized when determining if a resource has architectural, historical, archaeological, or cultural significance.

- **Criterion 1:** Is the resource 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 U.S.?
- **Criterion 2:** Is the resource associated with the lives of persons important to local, California, or national history?
- **Criterion 3:** Does the resource embody the distinctive characteristics of a type, period, region, method of construction, or represent the work of a master or possess high artistic values?
- **Criterion 4:** Has the resource yielded, or have the potential to yield, information important to the prehistory or history of the local area, California, or the nation?

These factors are broadly mirrored in criteria for historic significance within CEQA, California Register of Historic Resources (CRHR), and the SCCC.

3.5.3.2 Local

County of Santa Cruz General Plan and Local Coastal Program

The County of Santa Cruz General Plan and Local Coastal Program (General Plan/LCP) was adopted by the Board of Supervisors in May of 1994 and certified by the California Coastal Commission in December of 1994. The Santa Cruz County General Plan Conservation and Open Space Element includes policies to conserve historical, paleontological, and archaeological resources. Relevant objectives and policies are listed below (County of Santa Cruz 1994). General Plan objectives and policies denoted with “LCP” in the title indicate that objective/policy is included as part of the Local Coastal Program.

Conservation and Open Space Element

Objective 5.9 – Hydrological, Geological and Paleontological Resources (LCP). To protect hydrological, geological and paleontological resources which stand out as rare or unique and representative in Santa Cruz County because of their scarcity, scientific or educational value, aesthetic quality or cultural significance.

Hydrological, Geological and Paleontological Resources Policy 5.9.1 – Protection and Designation of Significant Resources (LCP). Protect significant geological features such as caves, large rock outcrops, inland cliffs and special formations of scenic or scientific value, hydrological features such as major waterfalls or springs, and paleontological features, through the environmental review process. Designate such sites on the General Plan and LCP Resources and Constraints Maps where identified. Currently identified sites of Significant Hydrological, Geological and Paleontological Features are as follows:

Bonny Doon Planning Area:

- Majors Creek Canyon: The cliffs and exposed rocks of this canyon to the east of Highway 1 are outstanding scenic features.
- Martin Road: East and west of Marin Road, encompassed in the botanical sites, are unusual sandhill outcroppings.
- Wilder Creek: This area contains a concentration of limestone caves worth protecting.
- Table Rock: Highly scenic coastal rock formations (sedimentary intrusive bodies) can be found in the vicinity of Table Rock and Yellow Bank Creek.

Hydrological, Geological and Paleontological Resources Policy 5.9.2 – Protecting Significant Resources Through Easements and Land Dedications (LCP). Encourage and obtain where possible Open Space Easements or other forms of land dedication to conserve as open space those areas containing hydrological, geological or paleontological features of significant scenic or scientific value.

Objective 5.19 – Archaeological Resources (LCP). To protect and preserve archaeological resources for their scientific, educational and cultural values, and for their value as local heritage.

Archaeological Resources Policy 5.19.1 – Evaluation of Native American Cultural Sites (LCP). Protect all archaeological resources until they can be evaluated. Prohibit any disturbance

of Native American Cultural Sites without an appropriate permit. Maintain the Native American Cultural Sites ordinance.

Archaeological Resources Policy 5.19.2 – Site Surveys (LCP). Require an archaeological site survey (surface reconnaissance) as part of the environmental review process for all projects with very high site potential as determined by the inventory of archaeological sites, within the Archaeological Sensitive Areas, as designated on the General Plan and LCP Resources and Constraints Maps filed in the Planning Department.

Archaeological Resources Policy 5.19.3 – Development Around Archaeological Resources (LCP). Protect archaeological resources from development by restricting improvements and grading activities to portions of the property not containing these resources, where feasible, or by preservation of the site through project design and/or use restrictions, such as covering the site with earth fill to a depth that ensures the site will not be disturbed by development, as determined by a professional archaeologist.

Archaeological Resources Policy 5.19.4 – Archaeological Evaluations (LCP). Require the applicant for development proposals on any archaeological site to provide an evaluation, by a certified archaeologist, of the significance of the resource and what protective measures are necessary to achieve General Plan and LCP Land Use Plan objectives and policies.

Archaeological Resources Policy 5.19.5 – Native American Cultural Sites (LCP). Prohibit any disturbance of Native American Cultural Sites without an archaeological permit which requires, but is not limited to, the following:

- A statement of the goals, methods, and techniques to be employed in the excavation and analysis of the data, and the reasons why the excavation will be of value.
- A plan to ensure that artifacts and records will be properly preserved for scholarly research and public education.
- A plan for disposing of human remains in a manner satisfactory to local Native American Indian groups.

Objective 5.20 – Historic Resources. To protect and where possible restore buildings, sites and districts of historic significance to preserve the rich cultural heritage of the community.

Historic Resources Policy 5.20.3 – Development Activities. For development activities on property containing historic resources, require protection, enhancement and/or preservation of the historic, cultural, architectural, engineering or aesthetic values of the resource as determined by the Historic Resources Commission. Immediate or substantial hardship to a project applicant shall be considered in establishing project requirements.

Historic Resources Policy 5.20.4 – Historic Resources Commission Review. Require that applicants for development proposals on property containing a designated Historic Resource submit plans for the protection and preservation of the historic resource values to the Historic Resources Commission for its review and approval; require an evaluation and report by a professional historian or a cultural resources consultant when required by the Commission.

Historic Resources Policy 5.20.5 – Encourage Protection of Historic Structures. Encourage and support public and private efforts to protect and restore historic structures and continue their use as an integral part of the community.

Historic Resources Policy 5.20.6 – Maintain Designation as a Certified Local Government.

Support existing and further develop local historic resource programs in order to maintain the California State Department of Parks and Recreation’s designation of Santa Cruz County as a Certified Local Government (CLG).

Santa Cruz County Code (SCCC)**Chapter 16.40 – Santa Cruz County Native American Cultural Sites Ordinance**

The Board of Supervisors of the County of Santa Cruz adopted the Native American Cultural Sites Ordinance, SCCC Chapter 16.40, which establishes regulations for the protection, enhancement, and perpetuation of Native American cultural sites. The ordinance requires an archaeological survey for any discretionary project resulting in ground disturbance and located within a mapped archeological sensitive area. In addition, an archeological survey is required for any project resulting in ground disturbance within 500 feet of a recorded Native American cultural site.

Furthermore, any person who discovers human remains, or any artifact or other evidence of a Native American cultural site during ground disturbance or excavation shall adhere to the following regulations:

- Cease and desist from all further excavations and disturbances within 200 feet of the discovery.
- Arrange for staking completely around the area of discovery by visible stakes no more than 10 feet apart, forming a circle having a radius of no less than 100 feet from the point of discovery.
- Notify the Sheriff-Coroner and Planning Director of the discovery.

If the Planning Director determines that the discovery is a site of cultural significance, an archaeological report must be prepared and no further excavation or development may take place except as authorized by an Archaeological Site Development Approval.

Chapter 16.42 – Santa Cruz County Historic Preservation Ordinance

The Board of Supervisors of the County of Santa Cruz adopted the Historic Preservation Ordinance, SCCC Chapter 16.42, which intends to implement the General Plan historic resources policies to designate, preserve, protect, enhance, and perpetuate those historic structures, districts and sites within the unincorporated area of the County. This ordinance establishes the definition of historic resources in the County, the procedures for designation of historic structures, and standards for permit review for alteration of an historic structure. Specifically, it does the following:

- Establishes the County’s historic resources inventory which identifies significant historic resources in the unincorporated portion of the County;
- Requires that a historic review be conducted prior to carrying out of activities or final County approval of projects which affect historic resources; and
- Regulates activities which affect historic structures, objects, properties, sites or districts.

The County Planning staff maintains the HRI, a listing of all officially designated historic resources in the County. Periodically, this inventory is revised to recognize changes in the specific properties or to

add/delete historic resources based on updated information. The Historic Resource Commission reviews proposals to amend the HRI and applications for changes to the exterior of properties included on the HRI. For officially designated historic resources, the State Historic Building Code, a more lenient building code developed to allow structural modifications to historic buildings, may be used in place of the standard building codes.

Chapter 16.42.050 – Historic resource designation.

Structures, objects, sites and districts shall be designated as historic resources if, and only if, they meet one or more of the following criteria and have retained their architectural integrity and historic value:

- The resource is associated with a person of local, State or national historical significance.
- The resource is associated with an historic event or thematic activity of local, State or national importance.
- The resource is representative of a distinct architectural style and/or construction method of a particular historic period or way of life, or the resource represents the work of a master builder or architect or possesses high artistic values.
- The resource has yielded, or may likely yield, information important to history.

Chapter 16.42.060 – Development procedures for designated historic resources.

For projects involving demolition of the historic structure, or involving relocation of an historical structure, the application submittal shall also include:

- A special inspections report from the County Planning Department on the condition of the structure.
- An historical documentation report prepared according to guidelines established by the Historic Resources Commission. The report shall contain the following:
 - Information which supports the claim that preservation is not feasible due to the deteriorated condition of the structure or object, or would create exceptional hardship, or is necessary to alleviate a dangerous condition.
 - Provisions to preserve the historic values of the structure or object by documentation and/or preservation of artifacts and building materials.
- Alternation and/or new construction is subject to restrictions and review by the County to preserve historic features.

Chapter 16.44 – Santa Cruz County Paleontological Resource Protection Ordinance

This chapter establishes appropriate protective regulations and procedures around significant valuable, irreplaceable paleontological resources in Santa Cruz County which may be degraded or destroyed by development activities, in order to protect these resources for their scientific and educational values. The ordinance requires a paleontological survey for the following development activities located in areas of known paleontological resources as shown on the paleontological resource protection maps (on file in the Planning Department):

- All development projects which will result in ground disturbance; and

- All shoreline protection projects and shoreline access projects.

If the Environmental Coordinator determines from the paleontological survey that more information is required to ensure protection of paleontological resources, a paleontological report is required. For projects where environmental review is required, the paleontology surveyor report would be incorporated into the environmental review procedures.

Furthermore, if a paleontologist determines during development activities that significant paleontological resources exist on the project site that were not previously identified, then the project developer shall immediately cease and desist from excavation or disturbance of the project site, and shall allow inspection of the site by the Planning Director.

Chapter 13 – Santa Cruz County Zoning Ordinance

Chapter 13.10 Article V. L Historic Landmark Combining District

The purposes of the Historic Landmark L Combining District are to:

- Preserve and enhance structures, objects, sites, and areas of historic, archaeological, culture, architectural, engineering, or aesthetic significance, importance, and value as part of the development, heritage, or cultural characteristics of the County, state, or nation;
- Identify those structures, objects, sites, and districts which have been designated as historic resources by the Board of Supervisors pursuant to the provisions of Chapter 16.42 SCCC, *Historic Resources Preservation*; and
- Regulate alterations, new construction, relocations, demolitions, and excavations which affect historic structures, objects, and sites or districts in accordance with the provisions of Chapter 16.42 SCCC, *Historic Resources Preservation*.

The Historic Landmark L Combining District is used to denote those properties which have been designated by the Board of Supervisors as historic resources pursuant to the provisions of Chapter 16.42 SCCC, *Historic Resources Preservation*. In addition to the regulations for development and use of the site imposed by the basic zone district, use, alterations, new construction, relocations, demolitions, and excavations which affect historic structures, objects, sites or districts in the Historic Landmark L Combining District are also subject to the regulations set forth in Chapter 16.42 of the SCCC, *Historic Resources Preservation*.

3.5.4 Methodology and Assumptions

This analysis determines whether the Program has the potential to create impacts to cultural resources in the County, considering both the Project scenario and the More Permissive Project scenario identified in Chapter 2, *Project Description*. As stated in Chapter 2, *Project Description*, the County is broken up into four general regions for planning purposes: North Coast, Mountain, Urban, and South County regions. Cultural resources occur throughout the County and are sometimes characterized in this analysis by the region in which they occur. Refer to Section 3.0, *Introduction and Approach to Analysis*, for a detailed discussion of projected cannabis activities in the County due to Program implementation.

The analysis is based on a review of the existing cultural resources identified in Section 3.5.2, *Environmental Setting*, information and analysis available in cultural resources reports that have been previously conducted for properties in the County, and data gathered from the NWIC records search. Sources consulted during the NWIC records search include: the NRHP, the California Points of Historical Interest (CPHI), the CHL, the CRHR, the OHP, the HRI for the County, and the Archaeological Determination of Eligibility (ADOE) list. In addition, both modern and historical maps were reviewed.

To determine whether any known Native American cultural sites such as traditional use or gathering areas and places of religious or sacred activity are present within the County, the NAHC in Sacramento was contacted on March 29, 2017 to request a review of their Sacred Lands File (SLF) inventory. The NAHC responded on April 5, 2017, stating that the SLF indicates the presence of Native American cultural resources within the County was “negative”. In addition, consultation letters were sent to Native American individuals and tribal representatives provided by the NAHC. An outreach letter (sent via electronic mail on April 19, 2017) describing the Program was sent to these individuals and organizations requesting their input. A copy of the letters sent, the list of contacts provided by NAHC, and responses received are included in Appendix H.

Additionally, a cultural resources record search was conducted in April 2017, which focused on two concentrated areas of known cannabis cultivation in Pajaro Valley and San Lorenzo Valley, where a substantial portion of cannabis cultivation and manufacturing is expected to occur based on the County’s license registration data (Appendix D). The analysis also takes into consideration the existing General Plan and LCP policies that require conserving cultural and appropriate historical, paleontological and archaeological resources, and relevant chapters in the SCCC.

3.5.5 Significance Criteria

State CEQA Guidelines Section 15064.5 states that a resource shall be considered “historically significant” if it meets any of the criteria for listing in the CRHR (Public Resources Code [PRC] Section 5024.1, Title 14 California Code of Regulations, Section 4852). A resource may qualify for CRHR listing if it:

- A. Is associated with events that have made a significant contribution to the broad patterns of California’s history or cultural heritage;
- B. Is associated with the lives of persons important in our past;
- C. 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
- D. Has yielded, or may be likely to yield, information important in prehistory or history.

Cultural resources meeting one or more of these criteria are defined as “historical resources” under CEQA. Included in the definition of historical resources are prehistoric archaeological sites, historic archaeological sites, historic buildings and structures, traditional cultural properties important to a tribe or other ethnic group, cultural districts and landscapes, and a variety of other property types. Resources included in a local register of historical resources [pursuant to PRC Section 5020.1(k)], or identified as significant in an historical resources survey [meeting the criteria in PRC Section 5024.1(g)] also are considered “historical resources” for the purposes of CEQA.

The fact that a resource is not listed in, or determined to be eligible for listing in the CRHR, not included in a local register of historical resources, or not identified in an historical resources survey, does not preclude a lead agency from determining that the resource may be an historical resource as defined in PRC Sections 5020.1(j) or 5024.1(c). Generally, for historical resources, if a building is older than 50 years in age, it would have potential for significance under CEQA and the CRHR.

CEQA Guidelines Thresholds

The following thresholds of significance are based on Appendix G of the 2017 CEQA Guidelines. For purposes of this EIR, implementation of the Program may have a significant adverse impact on cultural resources if it would:

- Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(b).
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5(c).
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
- Disturb any human remains, including those interred outside of formal cemeteries.

Appendix G of the CEQA Guidelines states that a project is considered to have a significant impact on Tribal Cultural Resources if it is found to:

- 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, and that is:
 - 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
 - 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.

3.5.6 Environmental Impact Analysis and Mitigation

This section discusses the potential impacts to cultural resources associated with the Program. A detailed discussion of each impact follows. Where there are potentially significant or significant and unavoidable impacts, mitigation measures are proposed and the residual impact after mitigation is determined. The analysis takes into consideration a provision of the Program which requires that all cultivation licenses issued must be consistent with the County's policies, objectives, laws, regulations, and programs related to land use, including those related to the County's General Plan and LCP.

3.5.6.1 Program Impacts

Impact CR-1. Commercial cannabis cultivation and cannabis product manufacturing under the Program that occur in or near properties which may be historically significant but are not on the County's Historic Resources Inventory could potentially cause physical demolition, destruction, relocation, or alteration of historical resources. Impacts would be less than significant with mitigation.

Impact CR-1.1 – Direct Cultivation/Manufacturing. The direct impacts of the Program relate to the cultivation of cannabis plants and manufacturing of cannabis products. Cannabis cultivation and/or manufacturing could potentially involve reuse of historic structures for cannabis operations. For example, indoor grow operations commonly require construction of interior grow rooms to contain and control cannabis cultivation facilities, such as lights, irrigation, and climate control systems. Cannabis manufacturing operations could also require construction to contain various manufacturing equipment. If this were to occur within an historical building without first understanding and documenting the resource and designing the operation to preserve the historic value, the construction of indoor cannabis cultivation and/or cannabis manufacturing operations could adversely affect character-defining features and undermine the historic value of the property.

While historic structures that are listed on federal, state, and local inventories would be subject to County review under existing SCCC Chapter 16.42 addressing historic resources, potentially eligible historic structures that are not currently recorded may serve as sites for cannabis-related activities and would be subject to potential adverse impacts without measures to avoid degradation of historic structures. Similarly, any new cultivation and/or manufacturing operations within an eligible historic structure that has not been identified as a resource could interfere with the value and integrity of an historical resource. Further, cannabis-related activities, such as land clearing and modifications to existing structures that are near properties that are known historical resources, may have an adverse effect on the physical context of the historic structure, which may diminish its historic value. As the More Permissive Project would involve a greater area in the County that is eligible for cultivation sites than the Project, there would theoretically be more potential for historic resource impacts under the More Permissive Project.

As described in Section 3.5.3.2 above, the County General Plan/LCP Conservation and Open Space Element requires avoidance of impacts to historic resources. Known built historic resources in the County have been designated within the Historic Landmark L Combining District (Chapter 13.10 Article V of the Zoning Ordinance). Any proposed cultivation and/or manufacturing proposed on parcels that are zoned Historic Landmark L Combining District would be subject to the regulations for development and use of the historic resource property imposed by SCCC Chapter 13.10, as well as the regulations set forth in SCCC Chapter 16.42, Historic Resources Preservation. Adherence to these regulations would reduce any adverse effects on known built historical resources. However, structures that may be eligible historic resources but are currently unknown would require preliminary review to determine whether adverse effects may result from a proposed cannabis activity. The County Planning Department currently evaluates the potential for discretionary development proposals to adversely affect potentially significant historic structures and requires a historic resources assessment if the potential is high. This impact is *potentially significant*.

Mitigation Measures

MM CR-1.1: Preliminary Historic Assessment of Structures 50 Years Old or More. Prior to licensing cannabis cultivation or manufacturing activities on properties containing a structure or structures that are 50 years old or older and are not identified as historic resources in the County HRI, the structure(s) shall be reviewed for eligibility by the Planning Department Historical Resource Planner as an historic resource consistent with SCCC Chapter 16.42 and with the California Register of Historic Resources criteria. If the Planning Department determines after a preliminary review that the structure(s) may potentially meet the criteria for listing as a historic resource, and that the proposed licensed activities or developments have the potential to impact the historic significance of the structure(s), then the Licensee shall provide a historic assessment of the structure(s) prepared by a qualified historic consultant. The historic assessment shall include a completed DPR 523a form and a letter prepared by the historic consultant stating whether the property has historic significance. If it is determined based upon the historic assessment that the licensed activity or development will impact a structure that is eligible as an historic resource pursuant to SCCC Chapter 16.42 or the California Register of Historic Resources criteria, then the staff historical resource planner shall review the site development for compliance with the Secretary of the Interior Standards for the Treatment of Historic Properties. Project conditions will be applied as appropriate to ensure compliance with the Secretary of the Interior Standards.

Plan Requirements and Timing. On a case-by-case basis, the Cannabis Licensing Official shall request a review of the potential historic resource by the County Historical Resources Planner prior to granting a potential licensee a cannabis cultivation and/or manufacturing license.

Monitoring. When reviewing a potential structure(s) for cannabis activities, the Licensing Official and Historical Resources Planner shall determine if the structure is 50 years old or more; if so, the structure(s) shall be reviewed by the County to assess integrity and historic significance.

Post-Mitigation Level of Impacts

Implementation of MM CR-1 would ensure that historic review or historical documentation for any structure that is older than 50 years, has integrity and may have significance, and thereby may be a potentially eligible historic structure that would be impacted by cannabis activities, would be reviewed as part of licensing of cultivation and/or manufacturing. For any structure found to be eligible for listing as a historic resource consistent with SCCC Chapter 16.42 or with the California Register of Historic Resources criteria, historic review of the project consistent with SCCC Chapter 16.42 shall be required and the project shall include conditions when necessary to ensure that the project complies with the Secretary of the Interior Standards for the Treatment of Historic Properties. With the addition of appropriate project conditions to ensure compliance with the Secretary of the Interior Standards pursuant to CEQA guidelines 15064.5(b)(3), any residual impacts associated with Impact CR-1.1 would be *less than significant with mitigation*.

Impact CR-1.2. – Indirect Cultivation/Manufacturing. The indirect impacts of the Program relate to the construction of up to 228 new residential units, structures, roads, and utilities associated with cannabis cultivation and/or cannabis product manufacturing. In addition, compliance with the Fire Code for cannabis-related activities within structures could require significant site improvements to provide onsite fire water tanks (with potential for up to 568 tanks of up to 120,000 gallons each) with

related site pad clearing and grading, installation of a 20-foot wide road with turnaround, and managing vegetation for defensible space around a cannabis-related structure of up to 100 feet. Site grading and construction of the required paved roads and water tank structures would cause additional site disturbance and increase the risk of disturbance to a historic resource.

Although these new homes and site improvements would generally be built on existing lots, and some would be built regardless of Program implementation, they would still be considered an indirect impact of the Program since these new homes would be induced by the Program. As such, the development of homes and site improvements would only occur if commercial cannabis activities are licensed on a property. As discussed in Impact CR-1.1, if these supporting developments have the potential to result in the demolition, destruction, relocation or alteration of either a known historic resource listed on the County's HRI or a building that is 50 years old or older, and it is not identified through the standard review process, there is a potential adverse effect on historic resources. The additional development beyond cannabis cultivation and manufacturing development would exacerbate the risk of impacts to historic resources, which would be a *potentially significant* impact.

Mitigation Measures

Implement MM CR-1.1: Preliminary Historic Assessment of Structures 50 Years Old or More. As appropriate, review of historic resources for any site subject to licensing would apply to Impact CR-1.

Post-Mitigation Level of Impacts

Assessment of historic structures on a case-by-case basis will ensure that any undocumented historic structures are identified and protected as part of the licensing process. Any development on or involving historic properties, including those listed in the HRI, would also be subject to the guidelines and regulations set forth in the General Plan, Chapter 13.10 of the SCCC, Historic Landmark L Combining District, and Chapter 16.42 of the SCCC, Historic Resources Preservation Ordinance. Any of the new houses, water tanks, roads, and associated improvements would be subject to existing regulations and review processes. Therefore, with compliance with County policies, ordinances, and guidelines that protect significant historic resources, and with the implementation of MM CR-1.1, indirect impacts of both the Project and the More Permissive Project to historic resources would be *less than significant with mitigation*.

Impact CR-2. Commercial cannabis cultivation and cannabis product manufacturing under the Program could potentially cause disruption, alteration, destruction, or adverse effects on archaeological resources, tribal cultural resources, human remains, or paleontological resources. Impacts would be less than significant.

Impact CR-2.1 – Direct Cultivation/Manufacturing. The direct impacts of the Program relate to the direct cultivation of cannabis plants and manufacturing of cannabis products. Cannabis-related activities would occur across the County, but cannabis cultivation would be focused in the Mountain Region, including the San Lorenzo Valley, and the South County Region, including the Pajaro Valley. Prehistoric and historic archaeological resources are known to be present in the areas where cannabis activities are proposed, particularly in rural undisturbed areas. Some areas of the County may also include sites of historic or cultural significance to a community or ethnic group, such as the Ohlone/Costanoan tribes (refer to Appendix H). Site preparation and grading for cannabis cultivation or a new cannabis manufacturing building, or improved access for these uses, could disrupt or disturb

undiscovered cultural resources or a site of cultural significance under CEQA and/or eligible for listing on the California Register, or uncover human remains. Outdoor grows use natural ground soil for cultivation, which would require ground disturbance to grade an area for growing. Greenhouses, indoor grows, and new manufacturing buildings would also require ground disturbing and grading to prepare the site for a structure or building.

Both the Project and the More Permissive Project could have a potentially adverse effect on archaeological resources, tribal cultural resources, human remains, or paleontological resources if cannabis cultivation or manufacturing is done in an area where resources are present and unknown. Under the Project, licenses would only be granted to registrants who applied during the registration period, which includes some registrants who have existing operations already. For example, 567 registrants out of 760 reported they are currently cultivating cannabis. Therefore, some percentage of cultivation and/or manufacturing sites are already disturbed at these existing cannabis operations. Furthermore, a great deal (147 acres of the projected 190.1 acres) of future cannabis cultivation and manufacturing activities is projected to occur within existing greenhouses on CA parcels that have been farmed for three years prior, and these farmers were not required to register.

As described in Section 3.5.3.2, the County General Plan and LCP Conservation and Open Space Element objectives and policies require avoidance of impacts to both historic and prehistoric cultural resources. Further, Chapter 16.40 of the SCCC, or the Santa Cruz County Native American Cultural Sites Ordinance, establishes regulations and requirements to protect Native American cultural sites. Adherence to this ordinance would mitigate Program impacts to archaeological resources, tribal cultural resources, and human remains. In addition, Chapter 16.44 of the SCCC, or the Santa Cruz County Paleontological Resource Protection Ordinance, establishes regulations and procedures to protect significant valuable, irreplaceable paleontological resources in the County. Adherence to this ordinance through licensing would address Program impacts to paleontological resources. Under existing SCCC requirements, the need for an archaeological or paleontological survey would be determined by the County on a case-by-case basis during licensing for cannabis cultivation and/or manufacturing license applications. Therefore, compliance with all County policies, ordinances, and guidelines that protect significant cultural resources would ensure that direct impacts of both the Project and the More Permissive Project to archaeological resources, tribal cultural resources, human remains, and paleontological resources would be *less than significant*.

Impact CR-2.2 – Indirect Cultivation/Manufacturing. The indirect impacts of the Program relate to the construction of new residential units, structures, roads, and utilities associated with cannabis cultivation sites. As in Impact CR-2.1, site preparation and grading activities for new developments could inadvertently uncover archaeological, tribal, or paleontological resources. Development of accessory structures, fencing, or roads could also have indirect effects that include restricting access to a cultural resource, or altering the setting of a resource or cultural landscape.

In addition, as described in Impact CR-1.2, site grading and construction of the required paved roads and water tank structures would cause additional site disturbance and increase the risk of disturbance to undiscovered archaeological resources, tribal cultural resources, human remains, and paleontological resources.

Under the Project, licenses would only be granted to registrants who applied during the registration period, which includes some registrants who have existing operations already, as well as farmers at sites in the CA district, predominantly in existing greenhouses. Therefore, some percentage of cultivation and/or manufacturing sites are already disturbed at these existing cannabis operations.

Both the Project and the More Permissive Project could have potentially adverse effects. However, like Impact CR-2.1, any development or ground-disturbing activity would also be subject to the guidelines and regulations set forth in the General Plan and Chapters 16.40 and 16.44 of the SCCC and would be reviewed on a case-by-case basis during planning review. Therefore, indirect impacts of both the Project and the More Permissive Project to archaeological resources, tribal cultural resources, human remains, and paleontological resources would be *less than significant*.

3.5.6.2 Summary of Program Impacts and Proposed Mitigation Measures

Table 3.5-1 below provides a summary of the Program impacts related to cultural resources and proposed mitigation measures.

Table 3.5-1 Summary of Cultural Resources Impacts

Cultural Resources Impacts	Level of Significance	Mitigation Measures	Post-Mitigation Level of Significance	
			Project	More Permissive Project
Impacts from Commercial Cannabis Cultivation and Cannabis Product Manufacturing				
Impact CR-1. Commercial cannabis cultivation and cannabis product manufacturing under the Program that occur in or near properties which may be historically significant but are not on the County’s Historic Resources Inventory could potentially cause physical demolition, destruction, relocation, or alteration of historical resources. Impacts would be less than significant with mitigation.				
Direct	Potentially Significant	MM CR-1.1. Preliminary Historic Assessment of Structures 50 Years Old or More.	Less than significant with Mitigation	Less than significant with Mitigation
Indirect	Less than significant	MM CR-1.1. Preliminary Historic Assessment of Structures 50 Years Old or More.	Less than significant with Mitigation	Less than significant with Mitigation
Impact CR-2. Commercial cannabis cultivation and cannabis product manufacturing under the Program could potentially cause disruption, alteration, destruction, or adverse effects on archaeological resources, tribal cultural resources, human remains, or paleontological resources. Impacts would be less than significant.				
Direct	Less than Significant	None required	Less than Significant	Less than Significant
Indirect	Less than Significant	None required	Less than Significant	Less than Significant

3.5.6.3 Secondary Impacts

Impact CR-3. Unregulated commercial cannabis cultivation and cannabis product manufacturing under the Program could potentially cause adverse effects on historical resources, archaeological resources, tribal cultural resources, human remains, or paleontological resources. Impacts would be significant and unavoidable.

Impact CR-3. – Secondary Cultivation/Manufacturing. The secondary impacts of the Program relate to project-induced additional or expanded unregulated cannabis cultivation and manufacturing activity above baseline levels, which would be expected to occur in more remote areas of the County. However, these unregulated sites could be located anywhere in the County, including areas with known historical resources, archaeological resources, tribal cultural resources, human remains, or paleontological resources, or areas with a high potential to encounter unknown resources. Most of these sites would likely be located in unpopulated areas hidden from public view, such as remote mountainous properties and residential properties. Due to the secretive nature of these unregulated sites, cannabis cultivators/manufacturers would be unlikely to follow the appropriate guidelines and regulations pertaining to cultural resources set forth by the state and County. Therefore, these sites could potentially have an adverse effect on archaeological resources, tribal cultural resources, human remains, and paleontological resources from unpermitted ground disturbance. Since most built historical resources in the County are located in populated urban areas, the potential for unregulated cannabis activity going unnoticed within properties in the Historic Landmark L Combining District is unlikely. However, there is still a potential for unregulated and illegal cannabis activity to have an adverse effect on built historic resources, especially within structures that are eligible historic resources but are not listed on a local, state, or federal resource list. This is similar to the impact that any non-permitted development could have, since it is outside the system that identifies historic resources and regular compliance with regulations.

However, due to the inability to predict the location of unregulated commercial cannabis cultivation and/or manufacturing sites and the likelihood that future unregulated cannabis-related activities would result in the damage or demolition of known or unknown historical resources, archaeological resources, tribal cultural resources, human remains, or paleontological resources, secondary impacts of both the Project and the More Permissive Project to cultural resources would be *potentially significant*.

Mitigation Measures

Implement MM AT-1.3a. Sustained Enforcement Program. To reduce secondary impacts to historical and cultural resources associated with unregulated cannabis cultivation/manufacturing and related development activities, MM AT-1.3a, addressing County implementation of the Unlicensed Cannabis Cultivation and Manufacturing Enforcement and Compliance Program, shall apply to Impact CR-3.

Implement MM AT-1.3b. Annual Survey and Monitoring Report. To reduce secondary impacts to historical and cultural resources associated with unregulated cannabis cultivation/manufacturing and related development activities, MM AT-1.3b, addressing County criteria for an Annual Report, of licensed activities as well as illegal activities, including recommendations regarding enforcement staffing and resources, shall apply to Impact CR-3.

Post-Mitigation Level of Impacts

Since the locations of all built historic resources that are on the County HRI are known, it is possible to enforce appropriate practices related to historic resources on these properties. However, there is still a potential for unregulated and illegal cannabis activity to occur within structures that are eligible historic resources but are not listed on a local, state, or federal resource list. With implementation of MMs AT-1.3a and AT-1.3b, unregulated cannabis cultivation and/or manufacturing would be reduced over time either through enforcement/closure of the grow sites or the permitting and licensing of new grow sites. Therefore, unregulated cannabis activity in known sensitive cultural resource areas would be reduced, since the locations of archaeological sensitive areas and sensitive paleontological features in the County are known, and it is possible to enforce appropriate practices related to archaeological, tribal cultural, and paleontological resources in these areas. With implementation of these mitigation measures and consistency with the County's General Plan and Chapters 13.10 and 16.42 of the SCCC, secondary residual impacts in these known sensitive areas would be mitigated to a less than significant level. However, it is impossible to know where undiscovered eligible historical structures and sensitive archaeological and paleontological resources exist, unless the person who discovers these resources alerts the County. Since unregulated cultivators/manufacturers are unlikely to alert the County if their activities occur in potentially historic buildings or their ground-disturbing activities uncover potential cultural resources, residual impacts associated with Impact CR-3 would remain *significant and unavoidable*.

3.5.6.4 Cumulative Impacts

As described in Section 3.0, *Introduction and Approach to Analysis*, cumulative development and growth in population and employment is projected to be gradual toward 2035 with some change in agricultural uses and crop types and a changing regulatory landscape for commercial cannabis activities both regionally and statewide. Concurrent development of residential, commercial, and agricultural land uses with commercial cannabis cultivation and manufacturing could potentially result in disruption of built historic resource and archaeological, paleontological, or tribal cultural resources. Such impacts would likely be related to the potential disturbance of built historic resources and uncovered archaeological or paleontological resources. However, it is anticipated that restrictions and regulations of the proposed Program, as well as review processes for Development Plans and/or land use permits would address these issues on a project-specific level before permit or cannabis license issuance. The Program requires that cannabis cultivation and manufacturing comply with existing County policies and regulations and includes mitigation measures to protect historic resources. Development permits would be reviewed by the County to ensure compliance with the County's General Plan as well as the L Historic Landmark Combining District zoning, Native American Cultural Sites Ordinance, Historic Preservation Ordinance, and Paleontological Resource Protection Ordinance (Chapters 13.10, 16.40, 16.42, and 16.44 of the SCCC). Therefore, cumulative impacts to cultural resources are anticipated to be *less than significant*.