

Chapter 6. Cultural Resources

This chapter assesses potential effects on cultural and paleontological resources that could result from the two CWP alternatives. Cultural resources are defined as buildings, sites, districts, structures, or objects having historical, architectural, archaeological, or cultural significance. Paleontological resources are defined as fossilized remains of vertebrate and invertebrate organisms, fossil tracks and trackways, and plant fossils. This section briefly describes the prehistoric and historic setting of the Program Area, and it discusses known cultural and paleontological resources and cultural resource sensitivity in the Program Area. It identifies applicable federal, state, and local regulations; identifies potential impacts of construction and operation of the CWP; and proposes mitigation measures, where available, to reduce potentially significant impacts on cultural and paleontological resources.

6.1 Existing Setting

The proposed projects included in either CWP alternative would be constructed within the City of San Mateo; therefore, existing setting information is presented for the City of San Mateo. The existing setting is primarily summarized from the General Plan EIR (City of San Mateo, 2009) and the Citywide Archaeological Report (Chavez, 1983), and a cultural resource assessment (Basin Research Associates, 2005). This chapter incorporates by reference all of the sources from these documents. The references documents are available from the City of San Mateo Planning Division. The study area for this chapter is the City of San Mateo, where all CWP facilities would be constructed; see Figure 1-1.

6.1.1 Prehistory

San Mateo is set between two primary physical features, San Francisco Bay to the east and a ridge of hills on the City's west side. Native American occupation and use of the general area appears to extend over 5,000 to 7,000 years and may be longer. Evidence for early occupation along the bayshore has been hidden by rising sea levels from about 15,000 to 7,000 years ago or has been buried by sediments caused by marsh infilling along estuary margins since about 7,000 years ago.

Early occupants concentrated on hunting, gathering various plant foods, and collecting shellfish. According to Chavez (1983), the prehistoric way of life in the San Mateo Peninsula can be characterized as a hunting and gathering network of subsistence systems. Seasonally, parties went out from the villages to temporary camps within their territory to exploit the various available resources through hunting and gathering techniques. Subsistence patterns included the exploitation of marine resources by gathering mussel and shellfish in season, fishing for trout and salmon, taking of seals, and hunting land mammals. Intensive use of plant foods included the common use of acorns through the leaching process.

Known sites in the vicinity generally consist of dark midden (culturally affected) soils containing large quantities of shell, primarily obtained from the bayshore area. Most of the mound sites in the study area have been leveled and partially covered by roads, buildings, parking lots, and parks over the past 70 to 100 years.

6.1.2 Ethnography

The California Native Americans who occupied the Peninsula at the time of European contact are known as the Costanoan. The term Costanoan is derived from the Spanish word Costanos, meaning coast people. San Francisco Bay Area descendants of these people prefer the name Ohlone. Sources for Ohlone ethnographic data are limited primarily to European accounts during visits to the coast. Linguistic evidence suggests that the immediate ancestry of the historically known Ohlone people moved into the San Francisco region about A.D. 500. They likely migrated from the San Joaquin-Sacramento River Delta area. This theory of the arrival of Costanoan language in the San Francisco area is chronologically consistent with the appearance of Late Horizon artifact assemblages in San Francisco Bay Area archaeological sites.

The Costanoan transformed from hunters and gatherers to agricultural laborers who lived at the Franciscan missions and worked with former neighboring groups such as the Yokut, Miwok, and Patwin. After secularization of the missions between 1834 and 1836, some Native Americans returned to traditional religious and subsistence practices and others labored on Mexican ranchos. Thus, multi-ethnic Indian communities grew up in and around Costanoan territory and provided informant testimony to ethnologists from 1878 to 1933.

6.1.3 Historic Context

Spanish explorers in the late 1760s and 1770s were the first Europeans to traverse the San Francisco Peninsula. The first party, led by Gaspar de Portola and Father Juan Crespi, traveled up the coast in search of Monterey Bay but failed to recognize it based on previous descriptions. In fall 1769, they first sighted San Francisco Bay from a ridge on the Peninsula. Sergeant Jose Francisco Ortega scouted the area, although his exact route remains uncertain. The second exploration party, led by Fernando Javier Rivera and Father Francisco Palou, reached the San Francisco Peninsula in late 1774. They selected the Palo Alto area for a mission site but continued to travel north to San Francisco. In 1776, Colonel Juan Bautista de Anza and Father Pedro Font traveled from Monterey to San Francisco to select the settlement sites. Between 1769 and 1823, 21 missions were established by the Franciscan priests along the California coast between San Diego and Sonoma.

During the Spanish Period (1769–1822), the philosophy of government was directed at founding presidios, missions, and pueblos, with the land held by the Crown, whereas the later Mexican policy stressed individual ownership of land. About 1793, an adobe was built on the north bank of San Mateo Creek along El Camino Real, the trail connecting the San Francisco outpost with Monterey (City of San Mateo, 2009). This outpost functioned as a way station between Santa Clara and Mission Dolores. The footprint of the building appears to have straddled the southeast corner of Baywood Avenue and El Camino Real. The outpost produced grain and other crops, cattle, and sheep. By 1800, 30 mission-trained Native Americans were living in and around the adobe.

During the Mexican Period (1822–1848), vast tracts of land were granted to individuals. The Mexican period in California was an outgrowth of the Mexican Revolution, and its accompanying social and political views affected the mission system. The missions were secularized in 1833 and their lands divided among the Californios as land grants called ranchos. On the Peninsula, 18 ranchos were granted from mission lands. The rancho system generally remained intact until 1862–1864, when a drought forced many landowners to sell or subdivide their holdings.

The American Period started after 1848, with the initial population explosion on the Peninsula associated with the California Gold Rush, followed later by the construction of the transcontinental railroad in the late 1860s. European immigration and the development of a prosperous dairy industry had an impact on population growth in the area. Until about World War II, San Mateo County had a substantial agricultural or rural land use pattern. Former ranchos underwent a transformation in concert with the growth of transportation systems, the City of San Francisco, and other towns to the south in San Mateo County.

The town of San Mateo began to develop in the 1860s. In May 1861, construction began on the railroad to link San Francisco with San José. Charles Polhemus, a director of the San Francisco-San José Railroad, which ran through San Mateo, had William Lewis plan the town in 1862; the first plat of San Mateo consisted of about 16 blocks around the railroad depot. The first building to be erected near the tracks was the train station, and soon after buildings were constructed in the area of Main Street and Railroad Avenue. This was the beginning of downtown San Mateo. The opening of railroad service in San Mateo attracted many San Franciscans to the area. San Mateo was incorporated as a town in 1894.

6.1.4 Known Cultural Resources in San Mateo

The General Plan EIR provides a summary of the citywide cultural resources survey:

The 1983 survey concluded that while soil removal and construction have eliminated most above-ground shell mounds, good potential still exists for the presence of undisturbed subsurface archaeological deposits at surveyed sites. It was also concluded that high research potential exists for sites adjacent to San Mateo Creek. The “medium sensitivity” zone includes areas surrounding the high sensitivity areas and other locales where, while no sites are recorded, the settings are similar to those where recorded sites do occur. The majority of the City is in a “low sensitivity” zone wherein archaeological resources are not generally expected but may occur.

6.1.5 Paleontological Setting

As stated in the General Plan EIR, there are no known paleontological resources in the City of San Mateo.

6.1.6 Literature Review and Site Survey for WWTP Site

CH2M HILL conducted an archival literature review and a pedestrian survey for the WWTP Site. The literature review included a records search of the files at the Northwest Information Center California Historical Resources Information System (CHRIS). A 1-mile area around the WWTP Site was included in the search. The CHRIS records search included all recorded archaeological sites and all known cultural resource survey and excavation reports. The National Register of Historic Places online database and the Office of Historic Preservation database, which includes sites listed on the California Register, California Historical Landmarks, and California Points of Historical Interest, were searched as well.

The records search revealed that approximately 35 previous studies have occurred within a 1-mile radius. Of these, three studies (S-003166, S-006425, and S-0431760) intersect the WWTP Site. No resources of any kind have been recorded within the WWTP Site. Seven resources are recorded within a 1-mile radius (P-41-000273, P-41-000308, P-41-000466, P-41-000471, P-41-002103, P-41-002104, and P-41-002146).

On May 8, 2015, CH2M HILL conducted a pedestrian survey of three parcels: (1) the WWTP parcel located at 2050 Detroit Drive in San Mateo; (2) the City-owned Dale Avenue parcel, which is located outside the Dale Avenue Gate to the WWTP; and (3) the Detroit Drive parcel located across the street (north) from the WWTP parcel. CH2M HILL had full access to all plant properties. Potential historic or prehistoric archaeological resources observed are noted below. As part of the survey, Mr. Darin Schumaker at the WWTP provided detailed information on the history of the WWTP and existing structures. An intensive survey of was conducted for all areas where ground visibility existed, including an examination of all undeveloped areas and all areas of disturbed soil. Special attention was given to examining the soil around rodent holes for any evidence of color or texture change. A fourth area, the Bayfront parcels, is located immediately northeast of the WWTP and may be used as part of the CWP implementation. The parcel is privately owned, mostly paved, and used by a trucking company; an intensive pedestrian survey was not warranted. All parcels were included in the literature review and examined for potential sensitivity.

The existing WWTP is a mostly developed site, with only small sections of undeveloped land located in the southeast corner of the parcel. The WWTP contains numerous modern structures and wastewater processing units built in 1953 (Primary Clarifier #3), 1968 (new Administration Building, Electrical Shop, and Effluent Pump Station #1), and 1976, when several structures, including secondary treatment units, were added during a major expansion of the WWTP. The undeveloped areas include untended formerly landscaped sections along the southern wall toward the southeastern end of the parcel and a storage area in the southeastern side of the WWTP. Because of their age, these structures were reported on Department of Parks and Recreation (DPR) 523 forms.

The Dale Avenue parcel is mostly undeveloped. The parcel contains an approximately 10-foot wide paved walk/bike path running east to west that curves around the western side of the WWTP, but otherwise has no development except aboveground and belowground utilities that are primarily under the paved path and

toward the northeast corner of the parcel. These utilities include, but are not limited to, a natural gas meter and power disconnect. The parcel has been used to store equipment for City contractors and as storage for assorted rocks and soils (e.g., gravel and volcanic rocks). The parcel contains several areas of re-deposited soil and sand. Much of the parcel is covered with tall, dry grasses and wildflowers. The site also contains graffiti, small trash piles of modern cans and bottles, candy wrappers, and chip bags.

The Detroit Drive parcel has three distinct areas:

1. A locked, fenced area with a building and various equipment. The area also contains large tanks, pipes, trailers, and trailer-sized dumpsters filled with a mix of trash, soil, and manure. A portion of this fenced area is paved, and the rest is overgrown with tall grasses, vines, wildflowers, wild fennel, and trees.
2. An abandoned parking lot with a shuttle bus shelter that was used by a local company for overflow parking for its employees, according to Mr. Schumaker. The abandoned parking lot is mostly paved and contains street/security lights.
3. A field that appears mostly undisturbed, with a potential wetland feature, tall grasses, bulrushes, trees, and wildflowers. The field is west of the locked fenced area and east of the abandoned parking lot.

6.2 Regulatory Framework

6.2.1 State Regulations

6.2.1.1 California Register of Historical Resources

The California Register of Historical Resources (CRHR) is a guide to cultural resources that must be considered when a government agency undertakes a discretionary action subject to CEQA. CRHR helps government agencies identify and evaluate California's historic resources and indicates which properties are to be protected, to the extent prudent and feasible, from substantial adverse change (Public Resources Code [PRC] §5024.1(a)). Resources listed in or eligible for listing in CRHR are to be considered during the CEQA process.

A cultural resource is evaluated under four CRHR criteria to determine its historical significance. For a resource to have historical significance, it must be in accordance with the one or more of the following criteria (as defined in PRC §15064.5(a)(3)):

- i. Is associated with events that have made a significant contribution to the broad pattern of California's history and cultural heritage;
- ii. Is associated with the lives of persons important in our past;
- iii. 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
- iv. Has yielded, or may be likely to yield, information important in prehistory or history.

Any resource that meets the above criteria, and retains sufficient historic integrity, is considered a historical resource under CEQA.

In addition to meeting one or more of the above criteria, CRHR requires that sufficient time must have passed to allow a "scholarly perspective on the events or individuals associated with the resource." Fifty years is used as a general estimate of the time needed to understand the historical importance of a resource (California Code of Regulations [CCR] Title 14(11.5) §4852 (d)(2)). The Office of Historic Preservation recommends documenting, and taking into consideration during the planning process, any cultural resource that is 45 years or older.

CRHR also requires a resource to possess integrity, which is defined as "the authenticity of a historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance." Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association.

Resources that are significant, meet the age guidelines, and possess integrity would generally be considered eligible for listing in the CRHR.

6.2.1.2 California Public Resources Code Section 21083.2

Section 21083.2 of the California Public Resources Code describes the CEQA requirements for evaluating whether a project may have a significant effect on archaeological or paleontological resources. CEQA defines a “unique archaeological resource” as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets one or more of the following criteria:

- 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

CEQA further defines a “historical resource” as a resource that meets any of the following criteria:

- A resource listed in or determined to be eligible for listing in, the CRHR
- A resource listed in a local register of historical resources, as defined in PRC §5020.1(k)
- A resource identified as significant (e.g., rated 1 through 5) in a historical resource survey that meets the requirements of PRC §5024.1(g)
- Determined to be a historical resource by a project’s lead agency

Any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered a historical resource.

If the cultural resource in question is an archaeological site, CEQA requires that the lead agency first determine if the site is a historic resource, as defined in CCR Title 14(3)§15064.5(a). If the site qualifies as a historical resource, potential adverse impacts must be considered in the same manner as a historical resource. If the archaeological site does not qualify as a historical resource but does qualify as a unique archaeological site, then the archaeological site is treated in accordance with PRC §21083.2.

According to PRC §21083.2, if an impact on a historic or unique archaeological resource is significant, CEQA requires feasible measures to minimize the impact. Mitigation of significant impacts must lessen or eliminate the physical impact that a project will have on the resource. Generally, the use of drawings, photographs, and/or displays does not mitigate the physical impact on the environment caused by demolition or destruction of a historic resource. However, CEQA requires that all feasible mitigation be undertaken even if it does not mitigate impacts to a less than significant level.

CEQA Guidelines Section 15064.5(e) requires that excavation activities be stopped when human remains are uncovered and that the county coroner assess the remains. If the coroner determines that the remains are those of Native Americans, the Native American Heritage Commission must be contacted within 24 hours. The lead agency must consult with the appropriate Native Americans, if any, identified by the Native American Heritage Commission in a timely manner.

6.2.1.3 California Health and Safety Code

Section 7050.5(b) of the California Health and Safety Code specifies the protocol when human remains are discovered:

In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area

reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined, in accordance with Chapter 10 (commencing with Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27492 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner and cause of death, and the recommendations concerning treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code.

6.2.2 Local Regulations

6.2.2.1 City of San Mateo Zoning Code Requirements

Chapter 27.66, Historic Preservation, in the Municipal Code (City of San Mateo, 2015) requires review and approval through the City’s SPAR process for projects resulting in exterior façade modification, exterior alteration, or building addition involving any individually eligible building for the National Register of Historic Places. Review and approval is also required for other specifically identified buildings in the City’s Downtown Specific Plan Area and all structures in the Downtown Historic District. Modifications are evaluated for conformance with applicable federal guidelines.

6.3 Assessment Methods and Thresholds of Significance

The majority of CWP projects would be constructed in areas that are already disturbed. Therefore, data gathering was focused on (1) less-disturbed parcels where projects may be located and (2) the WWTP, which has structures that may be modified or removed. Collectively, these parcels are referred to as the WWTP Site and are described below.

Impacts on cultural resources may occur if the CWP would result in the following:

- A substantial adverse change in the significance of a historical resource, as defined in §15064.5 of the CEQA Guidelines
- A substantial adverse change in the significance of an archaeological resource, as defined in §15064.5 of the CEQA Guidelines
- 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

6.4 Environmental Impacts

Potential impacts of the CWP on cultural and paleontological resources are summarized in Table 6-1 and described in subsequent sections.

TABLE 6-1

Summary of Cultural Resources Impacts

Programmatic Environmental Impact Report, City of San Mateo Clean Water Program

Impact	In-System Storage Program	Full Conveyance Program	New Headworks Project	Primary Clarifier Project
Impact 6-1. Construction of the CWP could cause a substantial adverse change in the significance of an archeological resource pursuant to CEQA §15064.5.	Less than significant impact with mitigation			
Impact 6.2. Construction of the CWP could cause a substantial adverse change in the significance of paleontological resources.	Less than significant impact with mitigation			

TABLE 6-1

Summary of Cultural Resources Impacts*Programmatic Environmental Impact Report, City of San Mateo Clean Water Program*

Impact	In-System Storage Program	Full Conveyance Program	New Headworks Project	Primary Clarifier Project
Impact 6.3. The CWP would not cause a substantial adverse change in the significance of an historic structure or building pursuant to CEQA §15064.5.	No impact	No impact	No impact	No impact

Impact 6-1. Construction of the CWP could cause a substantial adverse change in the significance of an archeological resource pursuant to CEQA §15064.5.***In-System Storage Program***

The archival review did not identify any known resources within the WWTP Site. The archaeological survey did not identify any surface indicators of prehistoric and historic archaeological resources within the designated survey areas within the WWTP Site. No impacts on historic or prehistoric archaeological resources are expected to be present in the WWTP Site. Most collection system projects constructed outside the WWTP Site would be located primarily in areas that are already disturbed, including roadways, parking lots, and existing pipeline alignments and pump stations. Historic and prehistoric archaeological resources would not be expected to be present at these sites. Proposed in-system storage locations are generally located on sites that have been subject to grading or other disturbance activities.

However, prehistoric archaeological resources are known to occur in the general vicinity of the WWTP Site, as the records search demonstrated. In addition, the citywide cultural survey concluded that undisturbed subsurface archaeological deposits may be present in portions of the City. Therefore, there is some theoretical potential that prehistoric archaeological resources could be found in undisturbed soils during construction activities such as grading and excavation.

San Mateo has developed specific conditions of project approval that address the potential for discovery of cultural resources. Implementation of these conditions as **Mitigation Measure 6-1a Perform subsurface investigations prior to construction in high- and medium-archaeological sensitivity zones** would support identification, avoidance, and mitigation of cultural resources for projects in zones of greater archaeological sensitivity. In addition, **Mitigation Measure 6-1b Halt construction if archaeological resources are discovered** would provide for avoidance, recovery, or other mitigation of any unknown subsurface cultural resources encountered during construction activities at any location.

In addition to following the City's standard project conditions, the construction contractor is required to follow California Health and Safety Code Section 7050.5(b), which specifies protocols if human remains are discovered.

With implementation of **Mitigation Measure 6-1a** and **Mitigation Measure 6-1b**, impacts of the In-System Storage Program on cultural resources would be less than significant.

Full Conveyance Program

Potential impacts of the Full Conveyance Program on cultural resources would be the same as described above for the In-System Storage Program because proposed projects and facilities would be at the same sites, other than in-system storage locations that are not part of the Full Conveyance Program. Therefore, historic and prehistoric archaeological resources would not be expected to be present at the WWTP Site or most collection system project sites. However, prehistoric archaeological resources are known to occur in the general vicinity of the WWTP Site, and undisturbed subsurface archaeological deposits may be present in portions of the City. As described for the In-System Storage Program, **Mitigation Measure 6-1a Perform**

subsurface investigations prior to construction in high- and medium-archaeological sensitivity zones and Mitigation Measure 6-1b Halt construction if archaeological resources are discovered would reduce potential impacts of the Full Conveyance Program on cultural resources to a less than significant level.

New Headworks Project and Primary Clarifier Project

The New Headworks Project and Primary Clarifier Project would be located on the WWTP Site. As described for the In-System Storage Program, historic and prehistoric archaeological resources would not be expected to be present at the WWTP Site. However, prehistoric archaeological resources are known to occur in the general vicinity of the WWTP Site. Therefore, there is some theoretical potential that prehistoric archaeological resources could be found in undisturbed soils during construction activities. Implementation of **Mitigation Measure 6-1b Halt construction if archaeological resources are discovered** would reduce impacts to unknown subsurface resources encountered. Impacts of the New Headworks Project and Primary Clarifier Project on cultural resources would be less than significant.

Impact 6-2. Construction of the CWP could cause a substantial adverse change in the significance of paleontological resources.

In-System Storage Program

Although no paleontological resources are known in San Mateo, the potential does exist for unknown subsurface paleontological resources to be encountered during construction activities such as grading and excavating. San Mateo has developed specific conditions of project approval that address the potential for discovery of paleontological resources as a result of development in the City. These conditions would be implemented as **Mitigation Measure 6-2 Halt construction if paleontological resources are discovered** to reduce impacts of construction of the In-System Storage Program to less than significant.

Full Conveyance Program

Although no paleontological resources are known in San Mateo, the potential does exist for unknown subsurface paleontological resources to be encountered during construction activities such as grading and excavating. **Mitigation Measure 6-2 Halt construction if paleontological resources are discovered** would be implemented to reduce impacts of construction of the Full Conveyance Program to less than significant.

New Headworks Project and Primary Clarifier Project

Although no paleontological resources are known on the WWTP Site where the projects would be located, the potential does exist for unknown subsurface paleontological resources to be encountered during grading, excavation, and other construction activities. **Mitigation Measure 6-2 Halt construction if paleontological resources are discovered** would be implemented to reduce impacts of construction of the New Headworks Project and Primary Clarifier Project to less than significant.

Impact 6.3. The CWP would not cause a substantial adverse change in the significance of an historic structure or building pursuant to CEQA §15064.5.

In-System Storage Program

Collection system projects would be located primarily underground. The only permanent aboveground structures associated with the collection system are small metal and concrete enclosures at the entrance to the pump stations and over the in-system storage basins. These projects would not affect potentially historic structures or buildings.

Wastewater treatment projects would be constructed at the WWTP Site. As previously described, several parcels are vacant or do not contain buildings. Existing buildings and structures at the current WWTP facility may be demolished or removed as part of the In-System Storage Program. There are six existing historic-age structures on the WWTP parcel; the structures and the years they were constructed are as follows (Carollo Engineers, Inc., 2014):

1. The Control Building (original Administration Building), built in 1934
2. The Pump Room (connected to the Control Building), built in 1934
3. The abandoned thickener (connected to the Control Building), built in 1934
4. Primary Clarifier #1, built in 1934
5. Primary Clarifier #2, built in 1948
6. Primary Clarifier #3, built in 1953

These structures have been recorded on DPR 523 Forms by CH2M HILL, as described in Section 6.1.6. None of the buildings meet any of the criteria for listing on the CRHR (see Section 6.2.1.1); therefore, none are considered historical resources under CEQA. The recordation of these structures on DPR forms has exhausted their data potential, and no further work is recommended. Therefore, no impacts on historic buildings or structures would occur as a result of the In-System Storage Program.

Full Conveyance Program

Collection system projects would be located primarily underground. The only permanent aboveground structures associated with the collection system are small metal and concrete enclosures at the entrance to the pump stations. These projects would not affect potentially historic structures or buildings.

Wastewater treatment projects would be constructed at the WWTP Site. Existing buildings and structures at the current WWTP facility may be demolished or removed as part of the Full Conveyance Program. As described for the In-System Storage Program, none of the existing historic-age structures on the WWTP parcel meet the criteria for listing on the CRHR and none are considered historical resources under CEQA. No impacts on historic buildings or structures would occur as a result of the Full Conveyance Program.

New Headworks Project and Primary Clarifier Project

The New Headworks Project and Primary Clarifier Project would be constructed in currently vacant or undeveloped portions of the WWTP Site. No impacts on historic buildings or structures would occur.

6.5 Mitigation Measures

Mitigation Measure 6-1a. Perform subsurface investigations prior to construction in high- and medium-archaeological sensitivity zones.

Prior to issuance of a grading or building permit, the City shall determine if the project is located within a high- or medium-archaeological sensitivity zone. If the project site is determined to be located in a high- or medium-archaeological sensitivity zone, a qualified archaeologist shall perform a subsurface archaeological investigation at the site, including hand-augured borings and excavated test pits. The archaeologist shall analyze gathered data in relation to the detailed project construction plans. The findings of the investigation shall be submitted for review and approval of the chief of planning. This report shall include an evaluation of the “uniqueness” of all finds, anticipated project-related impacts, and recommendations for mitigating impacts.

Mitigation Measure 6-1b. Halt construction if archaeological resources are discovered.

In the event of the discovery of archaeological resources, the applicant shall be responsible for halting construction activities, notifying the chief of planning, and retaining a qualified archaeologist. The archaeologist would be required to evaluate the uniqueness of the find and to contact local Native American and historical organization and recommend a course of action.

Mitigation Measure 6-2. Halt construction if paleontological resources are discovered.

Should any potentially unique paleontological resources (e.g., fossils) be encountered during construction activities, work shall be halted immediately within 50 feet of the discovery. A qualified paleontologist shall

determine the significance of the discovery, evaluate the uniqueness of the find, and prepare a written report documenting the find and recommending further courses of action. Depending on the significance of the discovery, the actions may include avoidance, preservation in place, excavation, documentation, recovery, or other measures determined by the paleontologist.

6.6 References

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