IV. Environmental Impact Analysis

D. Geology and Soils

1. Introduction

Potential geologic and soils hazards of the Project, including the potential for the Project to cause direct or indirect impacts associated with existing environmental conditions that could cause, in whole or in part, fault rupture, ground shaking, liquefaction of soils, expansion of soils, and/or landslide were evaluated in the Project's Initial Study included as Appendix A of this Draft EIR and determined to be less than significant without mitigation as summarized below.

This section therefore evaluates the potential for the Project to directly or indirectly destroy a unique paleontological resource or unique geologic feature. This component of the analysis is based on the *Paleontological Resources Assessment for the 130 West College Street Project* (Paleontological Report),[1] which is included as Appendix E of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

There are several plans, regulations, and programs that include policies, requirements, and guidelines regarding paleontological resources at the federal, state, regional, and local levels. As described below, these plans, guidelines, and laws include the following:

- Society for Vertebrate Paleontology Standard Guidelines
- California Public Resources Code Section 5097.5
- Los Angeles General Plan Conservation Element

[1] *SWCA, Paleontological Resources Assessment for the 130 West College Street Project, March 2024. Refer to Appendix E of this Draft EIR.*

(1) Federal

(a) Society for Vertebrate Paleontology Standard Guidelines

The Society for Vertebrate Paleontology (SVP) has established standard guidelines[2] that outline professional protocols and practices for conducting paleontological resource assessments and surveys, monitoring and mitigation, data and fossil recovery, sampling procedures, and specimen preparation, identification, analysis, and curation. The Paleontological Resources Preservation Act (PRPA) of 2009 calls for uniform policies and standards that apply to fossils on all federal public lands. All federal land management agencies are required to develop regulations that satisfy the stipulations of the PRPA. As defined by the SVP,[3] significant nonrenewable paleontological resources are:

> *Fossils and fossiliferous deposits here defined as consisting of identifiable vertebrate fossils, large or small, uncommon invertebrate, plant, and trace fossils, and other data that provide taphonomic, phylogenetic, paleoecologic, stratigraphic, and/or biochronologic information. Paleontological resources are considered to be older than recorded human history and/or older than middle Holocene (i.e., older than about 5,000 radiocarbon years)..*

As defined by the SVP,[4] significant fossiliferous deposits are:

> *A rock unit or formation which contains significant nonrenewable paleontologic resources, here defined as comprising one or more identifiable vertebrate fossils, large or small, and any associated invertebrate and plant fossils, traces, and other data that provide taphonomic, taxonomic, phylogenetic, ecologic, and stratigraphic information (ichnites and trace fossils generated by vertebrate animals, e.g., trackways, or nests and middens which provide datable material and climatic information). Paleontologic resources are considered to be older than recorded history and/or older than 5,000 years BP [before present].*

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[2] *Society of Vertebrate Paleontology, Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources, 2010.*

[3] *Society of Vertebrate Paleontology, Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources, 2010: .*

[4] *Society of Vertebrate Paleontology, Assessment and Mitigation of Adverse Impacts to Nonrenewable Paleontologic Resources: Standard Guidelines, Society of Vertebrate Paleontology News Bulletin 163:22-27, 1995.*

Based on the significance definitions of the SVP,[5] all identifiable vertebrate fossils are considered to have significant scientific value. This position is adhered to because vertebrate fossils are relatively uncommon, and only rarely will a fossil locality yield a statistically significant number of specimens of the same genus. Therefore, every vertebrate fossil found has the potential to provide significant new information on the taxon it represents, its paleoenvironment, and/or its distribution. Furthermore, all geologic units in which vertebrate fossils have previously been found are considered to have high sensitivity. Identifiable plant and invertebrate fossils are considered significant if found in association with vertebrate fossils or if defined as significant by project paleontologists, specialists, or local government agencies.

(2) State

(a) California PRC Section 5097.5

California Public Resources Code (PRC) Section 5097.5 provides protection for paleontological resources on public lands, where PRC Section 5097.5(a) states, in part, that:

> *No person shall knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands.*

(3) Local

(a) City of Los Angeles General Plan Conservation Element

The City's General Plan Conservation Element, adopted in September 2001, recognizes paleontological resources in Section 3: "Archeological and Paleontological" and identifies site protection as important, stating, "Pursuant to CEQA, if a land development project is within a potentially significant paleontological area, the developer is required to contact a bona fide paleontologist to arrange for assessment of the potential impact and mitigation of potential disruption of or damage to the site." Section 3 of the Conservation Element, includes policies for the protection of paleontological resources. As stated therein, it is the City's objective that paleontological resources be protected for historical, cultural research, and/or educational purposes. Section 3 sets as a policy to continue the identification and protection of significant

[5] *Society of Vertebrate Paleontology, Assessment and Mitigation of Adverse Impacts to Nonrenewable Paleontologic Resources: Standard Guidelines, Society of Vertebrate Paleontology News Bulletin 163:22-27, 1995.*

paleontological sites and/or resources known to exist or that are identified during "land development, demolition, or property modification activities."

b. Existing Conditions

The Paleontological Report included as Appendix E of this Draft EIR includes a detailed discussion of regional geology, local geology, and paleontology. As discussed therein, the surface of the Project Site, including the right-of-way immediately adjacent to the Project Site that would be trenched for utility improvements as described in Section II, Project Description, of this Draft EIR and the Paleontological Report, is mapped as late Pleistocene young alluvium, Unit 2 (Qya_2) (Figure 5 of the Paleontological Report). Although not mapped at the surface, late Pleistocene old fan deposits, Unit 1 (Qof_1) and early Pliocene to late Miocene Puente Formation (Tpsl, Tpss) are also mapped at the surface within a half-mile radius of the Project Site, suggesting they may be present at depth within the Project Site. Additionally, previous development within the Project Site and the results of the Geotechnical Investigation included as Appendix IS-2 of the Project's Initial Study, contained in Appendix A of this Draft EIR, indicate that unmapped Recent[6] artificial fill is present at the surface, overlying (and likely partially replacing the uppermost strata of the "native" surficial deposits of late Pleistocene young alluvium, Unit 2 [Qya_2]). As stated in the Paleontological Report, unmapped Recent artificial fill in the Project Site is unlikely to yield significant paleontological resources and has low paleontological potential. However, artificial fill is likely underlain by previously undisturbed "native" sediments at very shallow depth (e.g., 5 feet below ground surface) that may have the potential to contain significant paleontological resources; late Pleistocene young alluvium, Unit 2 (Qya_2) and late Pleistocene old fan deposits, Unit 1 (Qof_1) both have a high paleontological sensitivity; and early Pliocene to late Miocene Puente Formation (Tpsl, Tpss) have a high paleontological sensitivity.

A Natural History Museum of Los Angeles County (NHMLA) records search was conducted, and the search results did not identify any fossil localities recorded within the Project Site. However, several fossil localities have been recorded near the Project Site. Specifically, as discussed in the Paleontological Report, multiple sea life fossils were found approximately 0.6 miles from the Project Site at a depth of up to 50 feet; fossilized bristlemouth (*Cyclothone*) was found approximately 0.8 miles from the Project Site at an unknown depth; fossilized sabertoothed-cat (*Smilodon*), horse (*Equus*), deer (*Odocoileus*), and turkey (*Meleagris*) were found approximately 1.2 miles from the Project Site at an unknown, but presumed, shallow depth; fossilized mastodon (*Mammut*) was found approximately 1.2 miles from the Project Site at depths of 20 to 35 feet; fossilized fish (*Thyrsocles kriegeri*) were found at a separate site approximately 1.2 miles from the Project Site at depths of 102 to 105 feet;

[6] *As stated in the Paleontological Report, "Recent" in this context is defined as the latest late Holocene that may include both historic and modern ages.*

and fossilized horse (*Equus*) was found at a site approximately 2.2 miles from the Project Site at a depth of 43 feet. Refer to Table 1 and Appendix A of the Paleontological Report included as Appendix E of this Draft EIR.

3. Project Impacts

a. Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, the Project would have a significant impact related to geology and soils if it would:

Threshold (a): Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

- ***i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. Refer to Division of Mines and Geology Special Publication 42.***
- ***ii. Strong seismic ground shaking***
- ***iii. Seismic-related ground failure, including liquefaction***
- ***iv. Landslides***

Threshold (b): Result in substantial soil erosion or the loss of topsoil.

Threshold (c): Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.

Threshold (d): Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.

Threshold (e): Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of wastewater.

Threshold (f): Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

As previously noted, the Project's potential impacts related to Thresholds (a) through (e) were fully evaluated in the Initial Study included as Appendix A of this Draft EIR and were found to be less than significant without mitigation. This analysis is summarized below. Therefore, this section focuses on Threshold (f), which relates to paleontological resources.

For this analysis, the Appendix G Threshold listed above for paleontological resources is relied upon. The analysis utilizes factors and considerations identified in the City's 2006 *L.A. CEQA Thresholds Guide*, as appropriate, to assist in answering the Appendix G Threshold question.

The *L.A. CEQA Thresholds Guide* identifies the following factors to evaluate paleontological resources:

- Whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a paleontological resource; and
- Whether the paleontological resource is of regional or statewide significance.

b. Methodology

This section relies upon the Paleontological Report included as Appendix E of this Draft EIR. The Paleontological Report conforms to industry standards as developed by the SVP and best practices in mitigation paleontology. The purpose of the analysis included therein is to: (1) determine whether any previously recorded fossil localities occur in the Project Site at the surface or at depth; (2) if so, assess the potential for disturbance of these localities during construction; (3) evaluate the paleontological potential of the Project Site; and (4) evaluate the potential for adverse impacts to previously undiscovered significant paleontological resources that could be present within the Project Site and adversely impacted by implementation of the Project.

c. Project Design Features

No specific project design features are proposed with regard to paleontological resources.

d. Analysis of Project Impacts

Threshold (a): Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State

Geologist for the area or based on other substantial evidence of a known fault. Refer to Division of Mines and Geology Special Publication 42.

As evaluated in the Initial Study for the Project, which is included as Appendix A of this Draft EIR, based on a review of regulatory maps prepared by the California Department of Conservation and the City of Los Angeles General Plan Safety Element, the Project Site is not located within an Earthquake Fault Zone as mapped by the California Geological Survey (CGS).[7] As noted in the Geotechnical Investigation, included as Appendix IS-2 of the Initial Study, although the nearest fault is the Upper Elysian Fault approximately 0.12 miles north of the Project Site, the closest Alquist-Priolo Fault Rupture Hazard Zone is associated with the Hollywood Fault located approximately 3.6 miles north of the Project Site. Additionally, the Geotechnical Investigation did not identify active surface faulting within or directly adjacent to the Project Site. Therefore, impacts with respect to Threshold (a)i would be less than significant, and no further analysis is required.

Threshold (a): Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

ii. Strong seismic ground shaking

As evaluated in the Initial Study for the Project, which is included as Appendix A of this Draft EIR, while no active faults are known to pass directly beneath the Project Site, the Project Site is located within the seismically active region of Southern California. State and local code requirements ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, would reduce the substantial risk that buildings would collapse. The design and construction of the Project would comply with all applicable existing regulatory requirements, the applicable provisions of the Los Angeles Building Code relating to seismic safety, and the application of accepted and proven construction engineering practices, including the recommendations provided in a final geotechnical report for the Project, which will be subject to review and approval by LADBS. Therefore, the Project would not directly or indirectly cause potential substantial adverse effects related to strong seismic ground shaking. As such, impacts with respect to Threshold (a)ii would be less than significant, and no further analysis is required.

Threshold (a): Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

iii. Seismic-related ground failure, including liquefaction

[7] *State of California, California Geological Survey, Earthquake Zones of Required Investigation, https://maps.conservation.ca.gov/cgs/eqzapp/app/, accessed June 13, 2023.*

As evaluated in the Initial Study for the Project, which is included as Appendix A of this Draft EIR, according to the CGS map of Earthquake Zones of Required Investigation for the Hollywood Quadrangle and the County of Los Angeles Seismic Safety Element, the Project Site is located within an area identified as having a potential for liquefaction. In addition, the Project Site is mapped as a liquefaction area by the City.[8] Additional liquefaction analysis was therefore performed as part of the Geotechnical Investigation included as Appendix IS-2 of the Initial Study. Based on the results of that analysis, there are potentially liquefiable soil layers ranging from around 27 to 39 feet below ground surface and liquefaction-induced settlements are anticipated to range from approximately 0.2 to 1.5 inches. As such, the soils underlying the Project Site are characterized as Site Class D and the corresponding seismic design criteria are applicable. In addition, as noted above, the Project would be subject to current building codes. LADBS is responsible for implementing the provisions of the Los Angeles Building Code, and the Project would be required to comply with the plan review and permitting requirements of LADBS, including the recommendations provided in a final geotechnical report for the Project, which will be subject to review and approval by LADBS. Therefore, with adherence to existing regulations and site-specific design recommendations, impacts with respect to Threshold (a)iii would be less than significant, and no further analysis is required.

Threshold (a): Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

iv. Landslides

As evaluated in the Initial Study for the Project, which is included as Appendix A of this Draft EIR, Project Site and surrounding area are fully developed and the Project Site is generally characterized by relatively level topography. Large areas of exposed soil and/or rocks that could fall onto the Project Site are not present, since the majority of the Project Site is covered in pavement and landscaping is confined to two ornamental street trees that would remain as part of the Project. In addition, the Project Site is not located in a landslide area as mapped by the State,[9] nor is the Project Site mapped as a landslide area by the City.[10] Therefore, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. Therefore, no impact with respect to Threshold (a)iv would occur, and no further analysis is required.

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[8] *City of Los Angeles, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for 130 W. College Street, January 15, 2024.*

[9] *State of California, California Geological Survey, Earthquake Zones of Required Investigation, Hollywood Quadrangle, Seismic Hazard Zones, March 25, 1999.*

[10] *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 130 W. College Street, January 15, 2024.*

Threshold (b): Result in substantial soil erosion or the loss of topsoil.

As evaluated in the Initial Study for the Project, which is included as Appendix A of this Draft EIR, the Project Site is currently fully developed with surface parking. As such, there are no open spaces with exposed topsoil. However, development of the Project would require grading, excavation, and other construction activities that have the potential to disturb existing soils underneath the Project Site and expose these soils to rainfall and wind during construction, thereby potentially resulting in soil erosion. This potential would be reduced by implementation of standard erosion controls imposed by applicable regulations during site preparation and grading activities. Furthermore, the Project would be required to comply with the City's Low Impact Development (LID) ordinance and implement standard erosion controls to limit stormwater runoff, which can contribute to erosion. Regarding soil erosion during Project operations, the potential would be negligible since the Project Site would mostly remain fully developed. Therefore, with compliance with applicable regulatory requirements, impacts with respect to Threshold (b) would be less than significant, and no further analysis is required.

Threshold (c): Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.

As evaluated in the Initial Study for the Project, which is included as Appendix A of this Draft EIR, the Project Site is not located near slopes or geologic features that would result in on- or off-site landslides. Moreover, the Project Site is not located in a landslide area as mapped by the State or by the City. Upon buildout of the Project, the existing topography of the Project Site would not be substantially altered since the Project Site would remain relatively flat and would not cause landslides. As such, no impacts related to landslides would occur, and no mitigation measures related to landslides are required.

With respect to liquefaction, as discussed above, while the Project Site is located in an identified liquefiable area, with adherence to applicable seismic design standards and current building codes, impacts related to liquefaction would be less than significant, and no mitigation measures are required.

Based on the Project Site geology and the results of the subsurface investigation included in the Geotechnical Investigation included as Appendix IS-2 of the Initial Study, soils potentially susceptible to collapse are not present at the Project Site and impacts would be less than significant.

With respect to subsidence, there are no known ongoing extractions of oil or water that would lead to subsidence at the Project Site, and the subsurface soils are not known to contain

significant quantities of peat, the potential for subsidence at the Project Site is low. Impacts with respect to Threshold (c) would be less than significant, and no further analysis is required.

Threshold (d): Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.

As evaluated in the Initial Study for the Project, which is included as Appendix A of this Draft EIR, the soils at or near the Project's foundation level are predominantly granular (non-plastic), and therefore, the potential for expansive soils to be present at the Project Site is very low. In addition, Project design and construction would comply with all applicable requirements of LADBS as well as site-specific design recommendations set forth in the Geotechnical Investigation. Therefore, with adherence to existing regulations and site-specific design recommendations, impacts with respect to Threshold (d) would be less than significant, and no further analysis is required.

Threshold (e): Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of wastewater.

As evaluated in the Initial Study for the Project, which is included as Appendix A of this Draft EIR, of this Draft EIR, the Project Site is located within a community served by existing wastewater infrastructure. As such, the Project would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, the Project would not have an impact related to the ability of soils to support septic tanks or alternative wastewater disposal systems. No impact with respect to Threshold (e) would occur, and no further analysis is required.

Threshold (f): Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

(1) Impact Analysis

As discussed in the Paleontological Report included as Appendix E and above, the artificial fill on the Project Site is likely underlain by previously undisturbed "native" sediments at very shallow depth (e.g., 5 feet below ground surface) that may have the potential to contain significant paleontological resources; late Pleistocene young alluvium, Unit 2 (Qya_2) and late Pleistocene old fan deposits, Unit 1 (Qof_1) both have a high paleontological sensitivity; and early Pliocene to late Miocene Puente Formation (Tpsl, Tpss) have a high paleontological sensitivity. Approximately 67,686 cubic yards of soil would be excavated during Project construction. Moreover, the Project's maximum anticipated depth of excavation is 17 feet below ground surface for the construction of the subterranean parking level and trenches for the utility lines. Therefore, ground-disturbing activities greater than or equal to 5 feet below ground surface and beyond artificial fill and into sediments with a high paleontological sensitivity may

encounter previously unidentified paleontological resources. Any fossils encountered during ground disturbances at this depth or deeper in previously undisturbed sediments would be at risk for damage or destruction from construction activities, which would constitute an impact under CEQA. With respect to operational impacts, the Project does not include any activities, such as mining, that would involve continuous groundbreaking and excavation activities during Project operation. With regard to unique geologic features, given that the Project Site is located in a highly developed urban area, there are no unique geologic features on the Project Site. **However, given the potential for Project excavation to directly or indirectly destroy a unique paleontological resource during construction, impacts with regard to paleontological resources would be potentially significant.**

(2) Mitigation Measures

The following mitigation measure is proposed to reduce potential impacts to paleontological resources during Project construction:

Mitigation Measure GEO-MM-1: The Project shall implement the following measures to protect paleontological resources:

1. **Retain a Qualified Professional Paleontologist:** Prior to issuance of any demolition or grading permit, the applicant shall retain a Qualified Professional Paleontologist (Qualified Paleontologist), who meets or exceeds the Society of Vertebrate Paleontology (SVP) definition, to carry out all regulatory compliance measures and protocols related to paleontological resources. The Qualified Paleontologist shall obtain a curatorial arrangement with a qualified repository (e.g., the Natural History Museum of Los Angeles County [NHMLA]) prior to Project construction in the event of significant paleontological resource discoveries during construction.
2. **Conduct Worker Training:** The Qualified Paleontologist shall develop Worker Environmental Awareness Program training to educate the construction crew on the legal requirements for preserving fossil resources, as well as the procedures to follow in the event of a fossil discovery. This training program should be given to the crew before Project ground-disturbing work commences and should include handouts to be given to new workers as needed.
3. **Monitor for Paleontological Resources:** Full-time paleontological monitoring shall occur during Project ground-disturbing activities at depths greater than or equal to five feet below ground surface that impact previously undisturbed sediments that have high paleontological sensitivity, including late Pleistocene young alluvium, Unit 2 (Qya_2) and/or late Pleistocene old fan deposits, Unit 1 (Qof_1). In the unlikely event that early Pliocene to late Miocene Puente Formation (Tpsl, Tpss) is encountered at depth, these deposits should also be

subject to full-time paleontological monitoring. Monitoring should not be required when ground-disturbing activities are less than five feet below ground surface or when impacting only previously disturbed sediments and/or recent artificial fill regardless of depth. Monitoring shall be conducted by a qualified paleontological monitor who meets the standards of the SVP (2010) and who shall be supervised by the Qualified Paleontologist. The Qualified Paleontologist may periodically inspect construction activities to adjust the level of monitoring in response to subsurface conditions. Monitoring efforts can be increased, reduced, or ceased entirely if determined adequate by the Qualified Paleontologist. Paleontological monitoring shall include inspection of exposed sedimentary units during active excavations within sensitive geologic sediments. The monitor shall have authority to temporarily divert activity in the immediate vicinity away from exposed fossils to evaluate the significance of the find and, should the fossils be determined significant, professionally and efficiently recover the fossil specimens and collect associated data. The monitor shall record pertinent geologic data and collect appropriate sediment samples from any fossil localities. Recovered fossils should be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological repository (e.g., NHMLA).

4. **Prepare a Paleontological Resources Monitoring Report:** Upon conclusion of Project ground-disturbing activities, the Qualified Paleontologist overseeing paleontological monitoring shall prepare a final monitoring report that documents the paleontological monitoring efforts for the Project and describes any paleontological resources discoveries observed and/or recorded during the life of the Project. If paleontological resources are curated, the final monitoring report and any associated data pertinent to the curated specimen(s) shall be submitted to the designated repository (e.g., NHMLA). A copy of the final monitoring report shall be filed with the Los Angeles Department of City Planning.

(3) Level of Significance After Mitigation

With the implementation of Mitigation Measure GEO-MM-1, Project-level impacts during construction to paleontological resources would be reduced to a less-than-significant level.

e. Cumulative Impacts

(1) Impact Analysis

As indicated in Section III, Environmental Setting, of this Draft EIR, there are 21 related projects in the vicinity of the Project Site. The related projects comprise a variety of uses,

including, but not limited to, apartments, condominiums, restaurants, hotels, office, industrial, and retail uses, as well as mixed-use developments incorporating some or all of these elements. With regard to potential cumulative impacts related to paleontological resources, the Project and the related projects are located within an urbanized area that has been disturbed and developed over time. In the event that paleontological resources are uncovered, each related project would be required to comply with applicable regulatory requirements, the City's standard condition of approval for inadvertent findings, or implement mitigation measures as appropriate. Specifically, as part of the environmental review processes for the related projects, project-specific mitigation measures may be established as necessary to address the potential for uncovering paleontological resources. Compliance with regulatory requirements, and implementation of these standard conditions of approval and/or mitigation measures would reduce the potential for adverse effects on paleontological resources individually and cumulatively, and would preserve and maximize the potential of these resources to contribute to the body of scientific knowledge. **Therefore, cumulative impacts to paleontological resources would be less than significant.**

(2) Mitigation Measures

Cumulative impacts to paleontological resources would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts to paleontological resources were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact level remains less than significant.