Section 4.5
Cultural Resources

4.5.1 Overview

A cultural resources study ~~was conducted for purposes of this DEIR. That study included~~including a record search~~;~~, literature review~~; an onsite~~, cultural resources survey~~,~~ totaling approximately 96.6 acres~~;~~, and testing/evaluation of two ~~identified~~ archaeological sites~~. The complete study is available~~ was conducted in ~~Appendix E to this document. In addition to identifying potential environmental effects~~support of the ~~project,~~effort to create the proposed Alpine Park (Appendix E). The current cultural ~~resources study~~resource survey was completed ~~in order~~ to identify and map existing resources within the project site and to provide ~~the~~ County DPR with management information for ~~the proper~~ handling ~~of~~ potentially significant cultural resources~~, should they be found.~~. These measures include preservation recommendations, protective ~~actions~~ measures, and potential interpretive and educational opportunities.

4.5.2 Existing Conditions

The project is located at elevations ranging from approximately 1,886 to 2,054 feet above mean sea level. The geography of the project site includes steep hills with rolling knoll tops on the eastern half and abundant bedrock outcrops. The project site also includes rolling grasslands, and openings in coastal sage scrub and Engelmann oak woodlands. The project site lies within the Peninsular Ranges geomorphic province of California, a region characterized by northwest-trending faults and structural blocks with intervening valleys. Regional geologic maps for the area indicate that bedrock underlying the project site is situated atop three distinct geologic categories: pre-Cretaceous metamorphic rocks, Cretaceous granitic rocks, and Eocene sedimentary rocks. The pre-Cretaceous rocks consist of various metamorphic types. The granitic rocks, consisting of granite, granodiorite, and gabbro, are part of the southern California batholith in the area.

The project site is within a small area of Eocene non-marine sedimentary rock (e.g., Poway conglomerate), surrounded by Mesozoic basic intrusive rock (gabbro and diorite) and Mesozoic granitic rocks (Kennedy and Larson 1975). The soils mapped for the project site are Bosanko stony clay, 5 to 9% slopes; Fallbrook rocky sandy loam, 9 to 30% slopes, eroded; Cienaba very rocky coarse sandy loam, 30 to 75% slopes; and Cienaba-Fallbrook rock sandy loams, 9 to 30% slopes, eroded (USDA 1973). These soils generally support annual grasses and forbs, flattop buckwheat, chamise, California sagebrush, and oak or broadleaf chaparral (USDA 1973). The project site is largely undeveloped although not undisturbed. Past grazing and agricultural activities have changed the landscape over time. The project site has several active and passive trails and has been subject to past vegetation grubbing and clearing. It is covered in a mixture of native vegetation and nonnative grasses. Ground visibility was fair to poor throughout most of the project site, ranging from 10–90% (averaging 50%) in the uplands, 0–20% (averaging 15%) in the chaparral along the drainages and slopes, and 10–40% (averaging 25%) in grassy meadows.

4.5.2.1 Methodology

A cultural resources records search was conducted for the project at the South Coastal Information Center (SCIC) at San Diego State University on April 24, 2019. The SCIC cultural resources records search indicated that 26 cultural resources have been recorded within 0.25 mile of the project site, 4 of which are plotted within the project site. Of these 26 resources, 20 are prehistoric resources, 5 are historic period resources, and ~~one~~1 is a multicomponent resource.

~~An onsite~~The survey ~~was conducted which confirmed~~of the ~~location of~~project site relocated the four previously recorded cultural resources and did not identify any new cultural resources. The four resources reported within the project site consist of three prehistoric resources—bedrock milling sites (CA-SDI-5199, CA-SDI-19332, and CA-SDI-19333)—and one historic house complex archaeological site (CA-SDI-12236). One of the prehistoric resources (CA-SDI-5199) has been previously tested and determined to be ineligible for ~~either~~ the National Register of Historic Places (NRHP) or California Register of Historical Resources (CRHR). The remaining two (CA-SDI-19332 and CA-SDI-19333) were ~~not previously evaluated and therefore~~unevaluated then were ~~presently~~ tested and evaluated to determine~~; (a)~~ whether subsurface deposits are present, ~~(b) if so,~~ to define site boundaries and ~~(c) subsquently~~ assess resource significance. CA-SDI-19332 and CA-SDI-19333 are located within the proposed active park area~~; they~~ and were therefore tested through the excavation of subsurface ~~using~~ shovel test pits ~~evaluated~~ for their potential significance as resources eligible for the CRHR. Historic site CA-SDI-12236 was ~~also confirmed to be present, but was~~relocated and found to be in poor condition with many of the originally recorded features ~~having been substantially~~ deteriorated. ~~Site~~ CA-SDI-12236 is located within the proposed open space~~/preserve area, outside the proposed active park area, and was therefore~~ and was not evaluated for its potential eligibility for listing on the CRHR~~. However,~~, although based on the survey ~~observations,~~results the site appears unlikely to be significant.

4.5.2.2 Subsurface Conditions

The project site~~-~~ is largely undeveloped although some disturbance is evident through grubbing, clearing, recreational use, and past agricultural activities. Therefore, it can be assumed that anywhere from the top 3 to 18 inches of soil ~~-ha~~ves been previously disturbed across the project site, with the rocky and step areas being less likely to have much previous disturbance. This disturbance was visible in the excavations conducted at the three prehistoric sites. Such disturbance does not preclude the possibility for intact archaeological deposits to be present below the disturbance; however, archaeological testing at the sites does not suggest intact significant deposits are very likely ~~to be found~~ in the project site.

4.5.2.3 History of the Project Site

Prehistoric Period

The approximately 10,000 years of documented prehistory of the San Diego region has often been divided into three periods: the Early Prehistoric Period (San Dieguito complex), Archaic Period (Millingstone Horizon, Encinitas tradition, La Jolla and Pauma complexes), and Late Prehistoric Period (Cuyamaca and San Luis Rey complexes).

Early Prehistoric Period Complexes

The Early Prehistoric Period encompasses the earliest documented human habitation in the region; the San Dieguito complex is the earliest reliably dated occupation of the area. The assemblage of artifacts associated with this complex has been studied and elaborated upon extensively ~~[(~~Rogers 1939, 1945, 1966; Warren and True (1961); Warren (1967); Moriarty (1969, 1987~~)]~~.). The complex correlates with Wallace's (1955) Early Man Horizon, and Warren subsequently defined a broader San Dieguito tradition (1968). The earliest component of the Harris Site (CA-SDI-149/316/4935B) is located along the San Dieguito River northwest of the project site and is characteristic of the San Dieguito complex (Warren 1966, 1967; Warren and True 1961). Artifacts from the lower levels of the site include leaf-shaped knives; ovoid bifaces; flake tools; choppers; core and pebble hammerstones; and several types of scrapers, crescents, and short-bladed shouldered points (Warren and True 1961; Warren 1966). Little evidence for the San Dieguito Complex/Early Man Horizon has been discovered north of ~~San Diego~~the County.

Some researchers interpret the San Dieguito complex as having a primarily, but not exclusively, hunting subsistence orientation (Warren 1967, 1968, 1987; Warren et al. 1998). Others see a more diversified San Dieguito subsistence system as possibly ancestral to, or as a developmental stage for, the subsequent, predominantly gathering-oriented complex denoted as the La Jolla/Pauma complex (cf. Bull 1983; Ezell 1987; Gallegos 1985, 1987, 1991; Koerper et al. 1991).

Archaic Period Complexes

In the southern coastal region of California, the Archaic Period dates from circa (ca.) 8600 years before present (BP) to ca. 1300 BP (Warren et al. 1998). Archaic Period La Jolla/Pauma complexes have been identified from the content of archaeological site assemblages found dating to this period. These assemblages occur at a range of coastal and inland sites and appear to indicate that a relatively stable and sedentary hunting and gathering complex, possibly associated with one people, was present in the coastal and immediately inland areas of ~~San Diego~~the County for more than 7,000 years. La Jolla/Pauma complex sites are considered to be part of Warren's (1968) Encinitas tradition and Wallace's (1955) Millingstone Horizon. The inland, or Pauma complex, aspect of this culture lacks shellfish remains, but is otherwise similar to the coastal La Jolla complex and may, therefore, simply represent a non-coastal expression of the La Jolla complex (True 1958, 1980; True and Beemer 1982).

The content of Archaic Period La Jolla/Pauma site assemblages is characterized by manos and metates, shell middens, terrestrial and marine mammal remains, burials, rock features, cobble-based tools at coastal sites, and the increased presence of hunting equipment and quarry-based tools at inland sites. Artifact assemblages can also include bone tools; doughnut stones; discoidals; stone balls; plummets; biface points/knives; Elko-eared dart points; and beads made of stone, bone, and shell. Beginning at approximately 5500 BP and continuing during the latter half of the Archaic Period, evidence of hunting and the gathering and processing of acorns gradually increases through the area. The evidence in the archaeological record consists of artifacts such as dart points and the mortar and pestle, which are essentially absent during the early Archaic Period. The initial and subsequent increasing use of these technologies during the middle and late Archaic Period constitutes a major transition in how the prehistoric populations interacted with their environment in the southern coastal region. The period of this shift, from ca. 4000 to 1300 BP, has been designated as the Final Archaic Period (Warren et al. 1998).

Late Prehistoric Period Complexes

In the San Diego area, the Late Prehistoric Period has been described as a time characterized by an increased number of sites, as well as "many technological innovations, and new patterns in material culture and belief systems" (McDonald and Eighmey 1998:III-1). This description, in fact, aptly describes the period for the entire ~~San Diego~~ County area. The archaeological record documents changes in tool and ornament types, burial practices, and site location choices that vary from those documented for the earlier periods, as described below.

The Cuyamaca Complex is identified in southern San Diego County (Meighan 1954; True 1966, 1970; True et al. 1974). Peoples of southern San Diego County (Cuyamaca, Yuman) are believed to be the ancestors of the Hokan-speaking Diegueño or Kumeyaay (Ipai/Tipai) occupying southern San Diego County at contact. During late prehistoric times, the project site would have been within the area commonly associated with the archaeologically defined Cuyamaca complex.

The project site is situated in the traditional territory of the people known to the Spaniards as the Diegueño, a term derived from the San Diego Mission Alcalá, with which these people came to be associated. This term was later adopted by anthropologists (Kroeber 1925) and further divided into the southern and northern Diegueño. Shipek (1982) initiated use of a Yuman language term, "Kumeyaay," for the people formerly designated as the Diegueño. The Kumeyaay are traditionally considered to be a collector/hunting society characterized by central-based nomadism.

The linguistic and language boundaries, as seen by Shipek (1982), subsume the Yuman speakers into a single nomenclature, the Kumeyaay, a name applied previously to the mountain Tipai or Southern Diegueño by Lee (1937), while Almstedt (1974:1) noted that Ipai applied to the Northern Diegueño with Tipai and Kumeyaay for the Southern Diegueño. However, Luomala (1978:592) has suggested that while these groups consisted of over 30 patrilineal clans, no singular tribal name was used, and thus referred to the Yuman-speaking people as Ipai/Tipai (Carrico 1998: V-3–V-7).

As with most hunting-gathering societies (Service 1966:33), Kumeyaay social organization was formed in terms of kinship. More specifically, the Kumeyaay possessed a patrilocal type of band organization with band exogamy (marriage outside of one's band) and virilocal marital residence (the married couple integrates into the male's band). The band is often considered as synonymous with a village or ranchería, which is a political entity. Following White (1963), Almstedt (1980:45) has suggested that the term ranchería be applied to both a social and geographical unit, as well as to the particular population and territory held in common by a native group or band. She also stressed that the territory for a ranchería might comprise a 30-square-mile area. Many households would constitute a village or ranchería, and several villages were part of a much larger social system, usually referred to as a consanguineal kin group (cimuL). The cimuL is typically an exogamous, multilocal, patrilineal descent unit, often widely dispersed in local lineage. The members of the cimuL do not intermarry because of their presumed common ancestry, but they maintain close relations and often share territory and resources (Sahlins 1968:23; Service 1971:105–106; Luomala 1963:287–289).

Other researchers have designated the San Diego River as a natural feature that divides the Kumeyaay between those people living north of it, the Ipai (Northern Diegueño), and those south of it and into Baja California, the Tipai (Southern Diegueño) (Langdon 1975:64–70; Hedges 1975:71–83). With a history stretching back at least 2,000 years, the Kumeyaay, at the point of contact, were, as described by Carrico, settled in permanent villages or rancherías with strong alliances. Carrico

has indicated the possible locations for a number of these villages in the ~~San Diego~~ County area (Carrico 1998).

Although the Kumeyaay exploited a large variety of terrestrial and marine food sources, emphasis was placed on acorn procurement and processing, as well as the capture of rabbit and deer. Shipek (1989) has strongly suggested that the Kumeyaay, or at least some bands of the Kumeyaay, were practicing proto-agriculture at the time of Spanish contact. While Shipek's evidence is difficult to verify, the Kumeyaay were certainly adept land and resource managers, with a history of intensive plant husbandry.

The Kumeyaay practiced many forms of spiritualism with the assistance of shamans (kuessay) and cimuL leaders. Spiritual leaders were not elected, nor did they inherit their position; they achieved status because they knew all the songs involved in ceremonies (Shipek 1991) and had an inclination toward the supernatural. Important Kumeyaay ceremonies included male and female puberty rites, the fire ceremony, the whirling dance, the eclipse ceremony, the eagle dance, and the cremation ceremony, as well as the yearly mourning ceremony (Spier 1923:311–326). The primary ceremonial direction among the Kumeyaay is east, with rock art and entrances to ceremonial enclosures usually facing this direction (Kroeber 1925:717). The Kumeyaay are the only California tribe known to possess a color-direction system, with white representing the east, green-blue the south, black the west, and red the north (Kroeber 1925:717).

Historic Period

The first historic ownership of the project site was ~~at the time~~ when it was incorporated into the mission lands of Mission San Diego Alcala. Mission lands were appropriated for use as grazing land and growing crops. A map of the area from 1846 indicates the project site was at that time being used for growing grain. After the secularization of the missions in the 1830s, the mission lands were divided among those favored by the Mexican Governors of California. In 1846 a land grant that included all of Alpine was granted to Ramon and Leandro Osuna as part of a 13,000-acre rancho called Rancho Valle de las Viejas y Mesa del Arroz. However, the Osunas were absentee landholders and unable to establish their claim, and 8,877 acres were sold to Don Jose Antonio Aguirre, who retained ownership until 1862. The land went through several owners in the years afterwards~~.~~

~~Settlement~~, and settlement in Alpine did not become seriously established until the arrival of German and Swiss immigrants in ~~the1880s~~the 1880s. The project site remained undeveloped until it was purchased as part of a larger farm by Sydney and Anna Wright in 1920. The Wrights lived on the property until 1957. The remains of their home are in the northwest corner of the project site. Since that time, the project site has been subject to a variety of proposed development plans that were never brought to fruition. The project site remains undeveloped and has been used ~~by nearby residents~~ for years ~~as~~ unofficial recreational open space by nearby residents.

4.5.2.4 Archaeological Sites

P-37-005199/CA-SDI-005199

This resource consists of a knoll/outcrop containing at least 15–22 bedrock milling features with at least 42 milling elements: 7 basins and 35 milling slicks. Bedrock is granitic rock: granodiorite and tonalite. The site also contains a thin scatter of ceramics and lithic debitage. The site was originally recorded in 1977 by Cook and described as two knolls with over 100 milling elements and an

extensive low density lithic scatter with approximately 75 artifacts. In 1978 the site was excavated by Van Horn. The site was cleared of vegetation and the artifacts surface collected, resulting in the recovery of 321 artifacts including a single mano, four cores, six scrapers, a blade, a drill point, and a small amount of faunal bone. Three pottery sherds were also recovered. Eight 1- by 1-meter units were excavated, resulting in the recovery of 120 artifacts, most within the top 10 centimeters of the soil.

Roth and Berryman evaluated the site in 1990, excavating two 1- by 1-meter units and 24 shovel test pits, resulting in the recovery of few artifacts (1 pottery fragment and 15 flakes). The study led to a reduction in the size of the site's boundaries. Based on the limited number of artifacts recovered during excavation and disturbance since 1978 the site was considered to have no further research potential and recommended as not significant.

The site was updated and ~~evaluated~~tested in 2008 by Robbins-Wade and Giletti for a proposed residential development and found to be in the same condition as the 1990 excavations, with nothing found to contradict the conclusion that the research potential of the site has been fulfilled by the previous work conducted by Cook, Van Horn, and Roth and Berryman.

The current survey found the site in similar condition to the survey conducted in 200~~9~~8. The site is fairly disturbed by several bike and pedestrian trails. Much of the bedrock milling surfaces were found to be in poor condition due to heavy exfoliation. Over 100 flakes and two tools of metavolcanic material were identified within the site's previously recorded boundaries, mostly in disturbed pathways on the southeast side of the site. The site's boundaries were not expanded and appear to be consistent with the site as recorded when updated in 200~~9~~8 rather than with the larger area identified in 1978. The site does not possess archaeological deposits that would qualify it as a historical resource eligible under any criteria for the CRHR under CEQA.

P-37-030429/CA-SDI-019332

This resource consists of one bedrock milling feature with one slick. The current survey found the resource to be in poor condition: the milling surface has undergone severe exfoliation. No artifacts or midden soils were identified in the vicinity of the resource. The site was tested and evaluated for its potential significance and eligibility for the CRHR as ~~an~~a historical resource in December 2020. The site was tested through the excavation of four shovel test pits adjacent to the bedrock milling feature. None of the shovel test pits recovered any cultural material, and the site does not possess archaeological deposits that would qualify it as ~~an~~a historical resource eligible under any criteria for the CRHR under CEQA.

P-37-030430/CA-SDI-019333

This resource consists of two granitic bedrock milling features each with one slick. The current survey relocated the resource—40 meters due south of the mapped location recorded at the SCIC—and found the surface of the rocks to be highly exfoliated. The site was tested and evaluated for its potential significance and eligibility for the CRHR as ~~an~~a historical resource in December 2020. The site was tested through the excavation of five shovel test pits adjacent to the bedrock milling feature. None of the shovel test pits recovered any cultural material, and the site does not possess archaeological deposits that would qualify it as ~~an~~a historical resource eligible under any criteria for the CRHR under CEQA.

P-37-012236/CA-SDI-012236

This historic house complex recorded in 1991 includes a house foundation, garage, fishpond, and associated modern trash, as well as an in-ground concrete water storage feature. These may be associated with 1920–1957 Wright family ownership. Recorded artifacts included roofing material, wood, asphalt shingles, brick, cement rubble, cement foundations, rock walls, chimney remains, a concrete water tank, and one highly disturbed trash pit with white ware fragments, blue glass shards, and an iron frying pan. The site was identified during the 2008 study by Robbins-Wade and Giletti in much the same condition and was not evaluated as it was to be placed in open space and left undisturbed.

The far eastern portion of the site was revisited during the current survey. Several concrete and cobble foundations were consistent with the conditions recorded from 2008. No artifacts were identified within the surveyed portion of the resource.

4.5.2.5 Historic Built Environment

Research and survey of the project site yielded no evidence of substantial built-environment resource development within the project site during the historic period. No extant built environment resources have been identified within the project site.

4.5.3 Applicable Laws and Regulations

4.5.3.1 Federal

National Historic Preservation Act

The project site has no federal action that would require compliance with the National Historic Preservation Act.

4.5.3.2 State

California Environmental Quality Act

CEQA, which requires public agencies to evaluate the implications of their project(s) on the environment, includes significant historical resources as part of the environment. Public agencies must treat any cultural resource as significant, unless the preponderance of evidence demonstrates that it is not historically or culturally significant (California Code of Regulations [CCR] Title 14, Section 15064.5). A historical resource is considered significant if it meets the definition of a historical resource or a unique archaeological resource, as defined below.

Public Resources Code Section 5024.1 (California Register of Historic Resources)

The cultural evaluation was conducted in compliance with Section 5024.1 of the California Public Resources Code (PRC) to identify archaeological or historical resources within the project site.

The term historical resource includes, but is not limited to, any object, building, structure, site, area, place, record, or manuscript that is historically or archaeologically significant or significant in the

architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, per PRC Section 5020.1(j).

In most situations, resources that meet the definition of a unique archaeological resource also meet the definition of historical resource. As a result, it is current professional practice to evaluate cultural resources for significance according to their eligibility for listing in the CRHR. For the purposes of this CEQA cultural resources study, a resource is considered significant if it meets the CRHR eligibility (significance and integrity) criteria. Individual resource recommendations of eligibility are provided in this report.

Even without a formal determination of significance and nomination for listing in the CRHR, the lead agency can determine that a resource is potentially eligible for such listing to aid in determining whether a significant impact would occur. The fact that a resource is not listed in the CRHR, or has not been determined eligible for such listing, and not included in a local register of historic resources does not preclude an agency from determining that a resource may be a historical resource for the purposes of CEQA.

Public Resources Code Section 5097.5

PRC Section 5097.5 defines as a misdemeanor the unauthorized disturbance or removal of archaeological, historic, or paleontological resources located on public lands.

Health and Safety Code 7050.5

With respect to the potential discovery of human remains, Sections 7050.5(b) and (c) of the California Health and Human Safety Code state the following:

~~a~~b. 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 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of any death and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code. The coroner shall make his or her determination within 2 working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains.

~~b~~c. If the coroner determines that the remains are not subject to his or her authority and recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact by telephone, within 24 hours, the Native American Heritage Commission (NAHC) (California Health and Human Safety Code Section 7050.5).

Of particular note to cultural resources is Subsection (c), which requires the coroner to contact the NAHC within 24 hours if discovered human remains are thought to be of Native American origin. After notification, NAHC will follow the procedures outlined in PRC Section 5097.98, which include notification of the most likely descendants, if possible, and the recommendations for treatment of the remains. Also, willful possession of Native American human remains, or artifacts taken from a grave or cairn is a felony under ~~s~~State law (PRC Section 5097.99).

California Government Code Section 6254 (r) and 6254.10

California Government Code Sections 6254(r) and 6254.10 of the California Public Records Act were enacted to protect archaeological sites from unauthorized excavation, looting, or vandalism. Section 6254(r) explicitly authorizes public agencies to withhold information from the public relating to:

> "Native American graves, cemeteries, and sacred places maintained by the Native American Heritage Commission." Section 6254.10 specifically exempts from disclosure requests for "records that relate to archaeological site information and reports, maintained by, or in the possession of the Department of Parks and Recreation, the State Historical Resources Commission, the State Lands Commission, the Native American Heritage Commission, another state agency, or a local agency, including the records that the agency obtains through a consultation process between a Native American tribe and a state or local agency."

California Government Code Section 7927.000 and 7927.005

California Government Code Section 7927.000 (Added by Stats. 2021, Ch. 614, Sec. 2. [AB 7]; effective January 1, 2022, operative January 1, 2023, pursuant to Sec. 7931.000) of the California Public Records Act was enacted to protect tribal cultural resources sites from unauthorized excavation, looting, or vandalism.

> "Section 7927.000, except as provided in Sections 7924.510, 7924.700, and 7929.610, this division does not require disclosure of any of the following:
>
> (a) Records of Native American graves, cemeteries, and sacred places.
>
> (b) Records of Native American places, features, and objects described in Sections 5097.9 and 5097.993 of the Public Resources Code, which are maintained by, or in the possession of, the Native American Heritage Commission, another state agency, or a local agency."

California Government Code Section 7927.005 is similar to Section 6254.10 in that it also allows for archaeological site information to be exempt from disclosure to the public. It is slightly different in that it is not specific to Native American graves, cemeteries, and sacred places and is more broad in covering archaeological sites.

> "Nothing in this division requires disclosure of records that relate to archaeological site information and reports maintained by, or in the possession of, the Department of Parks and Recreation, the State Historical Resources Commission, the State Lands Commission, the Native American Heritage Commission, another state agency, or a local agency, including the records that the agency obtains through a consultation process between a California Native American tribe and a state or local agency."

4.5.4 Project Impact Analysis

4.5.4.1 Methodology

The following significance criteria are based on Appendix G of the ~~State~~ CEQA Guidelines and provide the basis for determining significance of impacts associated with historical resources resulting from the implementation of the project. The determination of whether a historical resource impact would be significant is based on the professional judgment of ~~the~~ County DPR as Lead Agency supported by the recommendations of qualified personnel at ICF and is based wholly on the substantial evidence provided by the technical analysis conducted for the project.

CEQA Guidelines for Determining Historical Resources

Historical Resources

Historical resources may be designated as such through three different processes:

1. Official designation or recognition by a local government, pursuant to local ordinance or resolution per PRC Section 5020.1(k).
2. A local survey conducted pursuant to PRC Section 5024.1(g).
3. Listing in, or eligibility for listing in, the NRHP, per PRC Section 5024.1(d)(1).

The process for identifying historical resources is typically accomplished by applying the criteria for listing in the CRHR, per 14 CCR 4852, which states that a historical resource must be significant at the local, ~~s~~State, or national level under one or more of the following four criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. It is associated with the lives of persons important in our past.
3. It embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of a master; or possesses high artistic values.
4. It has yielded, or may be likely to yield, information important in prehistory or history.

To be considered a historical resource for the purpose of CEQA, the resource must also have integrity, which is the authenticity of a resource's physical identity, evidenced by the survival of characteristics that existed during the resource's period of significance. Resources, therefore, must retain enough of their historic character or appearance to be recognizable as historical resources and convey the reasons for their significance. Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association. It must also be judged with reference to the particular criteria under which the resource is eligible for listing in the CRHR, per 14CCR 4852(c).

Unique Archaeological Resources

A unique archaeological resource is defined in PRC Section 21083.2 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 high probability that it meets the following criteria:

- Contains information needed to answer important scientific research questions and for which there is a demonstrable public interest.
- 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.

4.5.4.2 Thresholds of Significance

Appendix G of the ~~State~~ CEQA Guidelines

The following significance criteria are based on Appendix G of the ~~State~~ CEQA Guidelines and provide the basis for determining the significance of impacts associated with cultural resources resulting from implementation of the project. The determination of whether a cultural impact would be significant is based on the professional judgment of ~~the~~ County DPR as Lead Agency supported by the recommendations of qualified personnel at ICF and is based on the evidence in the administrative record.

Impacts are considered significant if the project would result in any of the following:

1. Cause a substantial adverse change in the significance of a historical or archaeological resource as defined in Section 15064.5.
2. Directly or indirectly destroy a unique paleontological resource or site or unique geological feature.
3. Disturb any human remains, including those interred outside of formal cemeteries.

~~Impacts for the following thresholds were determined to be less than significant in the initial study/environmental checklist and are therefore not discussed further in this EIR.~~

~~1. Directly or indirectly destroy a unique paleontological resource or site or unique geological feature.~~

~~2. Disturb any human remains, including those interred outside of formal cemeteries.~~

County of San Diego Guidelines for Determining Significance

The following significance criteria are based on the *County of San Diego Guidelines for Determining Significance for Cultural Resources: Archaeological and Historical Resources* (County of San Diego 2007). Impacts are considered significant if the project would result in any of the following:

1. Cause a substantial adverse change in the significance of a historical or archaeological resource as defined in Section 15064.5.
2. Directly or indirectly destroy a unique paleontological resource or site or unique geological feature.
3. Disturb any human remains, including those interred outside of formal cemeteries.

4.5.4.3 Project Impacts and Mitigation Measures

Threshold 1: Implementation of the project would cause a substantial adverse change in the significance of a historical or archaeological resource as defined in Section 15064.5.

County Park and Trails

Impact Discussion

Construction

Three of the four cultural resources (CA-SDI-5199, CA-SDI-19332, and CA-SDI-19333) identified during the survey have been tested and evaluated for listing in the CRHR and been recommended ineligible. One resource (CA-SDI-12236) has not been evaluated for listing in the CRHR and will be preserved in open space and the site will be avoided. The development of recreational activities must take into consideration potential impacts on cultural resources resulting from public access and increased public use at the entire project site. It is recommended that County DPR avoid, as much as possible, developing trails, staging areas, or other recreation areas that would allow for an increase in public access to or through sites. Trail development and maintenance activities may impact subsurface deposits, and the increase in traffic and accessibility may create direct impacts through vandalism, looting, or the inadvertent destruction of artifacts and site integrity.

Four cultural resources have been identified within the project site. Three of these resources have been previously evaluated under CEQA guidelines for listing on the CRHR and are recommended as not eligible for the CRHR and do not meet the threshold to qualify as unique archaeological resources. Ground-disturbing activities associated with construction of the project could potentially result in the discovery of previously unidentified cultural resources (**Impact-CUL-1**). Should previously undiscovered resources be identified they should be avoided where feasible. Any eligible sites that cannot be avoided in the development of the project site should be capped as a preservation measure. As a result of the potential for inadvertent damage or destruction of undisturbed archaeological resources, the project has the potential to materially alter physical characteristics that would qualify an archaeological resource for inclusion in the NRHP and CRHR (**Impact-CUL-1**). Therefore, the project has the potential to result in a significant impact on an archaeological resource. Mitigation measures consisting of preparation of a cultural resources monitoring and discovery plan (**MM-CUL-1**), cultural resources awareness training (**MM-CUL-2**), and conducting archaeological monitoring (**MM-CUL-3**) in areas where soils are previously undisturbed, would be necessary to reduce impacts to a less-than-significant level. Please refer to Section 4.18, *Tribal Cultural Resources,* for impacts and mitigation measures associated with tribal cultural resources.

Operation

Operations may include ground-disturbing work, such as irrigation repairs and additional landscaping. However, operational maintenance would involve shallow ground disturbance, whereas cultural resources are typically found deeper underground. Additionally, the areas where such operations would occur would be disturbed by construction where monitoring would be involved.~~Operation of the project would not result in ground disturbances or structural~~

~~modifications.~~ Therefore, in the absence of ground disturbances, no operations-related impacts on archaeological resources are expected to occur.

Impact Determination

Impact-CUL-1: **Potential to Unearth and Damage Significant Archaeological Resources During Construction.** Excavation of the project has the potential to unearth and damage significant archaeological resources during construction of the project. Therefore, implementation of the project may cause a substantial adverse change in the significance of an archaeological resource as defined in ~~State~~ CEQA Guidelines Section 15064.5. Impacts would be potentially significant.

Mitigation Measures

MM-CUL-1: Prepare and Implement a Cultural Resources Monitoring and Discovery Plan. Prior to the commencement of any ground-disturbing activities within previously undisturbed soils within the project area, ~~the~~ County DPR shall retain a qualified archaeologist (pre-approved by County DPR) who meets the Secretary of the Interior's Professional Qualification Standards (36 Code of Federal Regulations [CFR], Part 61) to prepare a Cultural Resources Monitoring and Discovery Plan (CRMDP) for the project area. Procedures to follow in the event of an unanticipated discovery apply to all project components. The CRMDP shall be submitted to ~~the~~ County DPR, as applicable based on the jurisdiction wherein the project component is located, and shall be reviewed and approved by County DPR, the relevant agency. If County DPR does not have in-house expertise to review the CRMDP, they shall respectively hire an expert who meets the Secretary of the Interior's Professional Qualification Standards (36 CFR 61) and ~~the~~ County DPR shall pay for said expert prior to the commencement of any ground-disturbing activities within the areas requiring archaeological monitoring.

County DPR's CRMDP review shall ensure that appropriate procedures ~~are in place~~ to monitor construction and treat unanticipated discoveries~~.~~ are in place. County DPR's review and approval of the CRMDP shall occur prior to the commencement of any construction activities subject to the requirements of the CRMDP. The CRMDP shall include required qualifications for archaeological monitors and supervising archaeologists and shall lay out protocols to be followed in relation to cultural resources, including both archaeological and tribal cultural resources. The CRMDP shall provide a summary of sensitivity for buried cultural resources. In addition, it shall describe the roles and responsibilities of archaeological and Native American monitors, County DPR, and construction personnel. The CRMDP shall describe specific field procedures to be followed for archaeological monitoring, including field protocol and methods to be followed should there be an unanticipated archaeological discovery. Evaluation of resources, consultation with Native American individuals, tribes and organizations, treatment of cultural remains and artifacts, curation, and reporting requirements shall also be described. The CRMDP shall also delineate the requirements, procedures, and notification processes in the event that unanticipated human remains are encountered.

The CRMDP shall delineate the area(s) that require archaeological monitoring. Mapping of the area(s) shall be made available to ~~the~~ County DPR, who shall incorporate this information into the respective construction specifications for the project.

MM-CUL-2: Prepare and Implement a Cultural Resources Awareness Training Prior to Project Construction. Prior to, and for the duration of, project-related ground disturbance

County DPR shall hire a qualified archaeologist, who meets the Secretary of the Interior's Professional Qualifications Standards (36 CFR 61) and approved by County DPR to provide cultural resources awareness training to project construction personnel. The training shall include a discussion of applicable laws and penalties under the law; samples or visual representations of artifacts that might be found in the project vicinity; and the steps that must be taken if cultural resources are encountered during construction, including the authority of archaeological monitors, if required to be on site during the project, to halt construction in the area of a discovery.

The cultural resources awareness training shall be conducted by a qualified archaeologist. A hard copy summary of cultural resources laws, discovery procedures, and contact information shall be provided to all construction workers. Completion of the training shall be documented for all construction personnel, who shall be required to sign a form confirming they have completed the training. The form shall be retained by County DPR to demonstrate compliance with this mitigation measure.

MM-CUL-3: Conduct Archaeological and Native American Monitoring.

An archaeological monitor or cross-trained archaeological/paleontological monitor and a Native American monitor shall be retained to observe all initial ground-disturbing activities, including brush clearance, vegetation removal, grubbing, grading, and excavation~~, within the recorded boundaries of P-36-005695.~~. The archaeological monitor shall meet the qualification standards of the California Office of Historic Preservation and shall be overseen by an archaeological principal investigator. The Native American monitor shall be selected from among the Native American groups identified by the NAHC as having affiliation with the project area. Prior to the start of ground-disturbing activities, the archaeological monitor shall conduct paleontological and cultural resources sensitivity training for all construction personnel. The Native American monitor or a representative shall be given the opportunity to participate. Construction personnel shall be informed of the types of paleontological or archaeological resources that may be encountered, and of the proper procedures to be enacted in the event of an inadvertent discovery of fossils, archaeological resources, or human remains. ~~The~~ County DPR shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance.

Archaeological monitoring shall be conducted by an archaeologist familiar with the types of archaeological resources that could be encountered within the project site and, if possible, who is cross-trained in paleontological resource identification. The qualified archaeologist, in coordination with ~~the~~ County DPR and Native American monitor, may reduce or discontinue monitoring if it is determined that the possibility of encountering buried archaeological deposits is low based on observations of soil stratigraphy or other factors. Both the archaeologist and Native American monitor shall be empowered to halt or redirect ground-disturbing activities away from the vicinity of a discovery until the qualified archaeologist or paleontologist has evaluated the discovery and determined appropriate treatment. If prehistoric archaeological materials are encountered, the Native American monitor shall participate in any discussions involving treatment and subsequent mitigation.

The archaeological monitor shall keep daily logs detailing the types of activities and soils observed, and any discoveries. After monitoring has been completed, the qualified archaeologist shall prepare a monitoring report that details the results of monitoring. The report shall be

submitted to ~~the~~ County DPR and any Native American groups who request a copy. A copy of the final report shall be filed at the SCIC. Monitoring actions and procedures shall be completed per the CRMDP described in **MM-CUL-1**.

Level of Significance After Mitigation

Impact-CUL-1 would be reduced to a less-than-significant level after implementation of **MM-CUL-1** through **MM-CUL-3**, which would ensure preparation and implementation of a CRMDP and Cultural Resources Awareness Training, as well as archaeological and Native American monitoring.

Threshold 2: The project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

County Park and Trails and Open Space~~/Preserve~~

Impact Discussion

Based on the results of the records search performed by the San Diego Natural History Museum, the project site features a range of low to no paleontological potential and moderate sensitivity. No recorded fossil localities were identified within 1 mile of the project site.

Construction

The primary type of activities that have the potential to directly destroy a unique paleontological resource or site are those that are ground disturbing. Construction of the project would include ground-disturbing activities such as grading and excavation. As described above, portions of the project site, including the potential Tavern Road sewer line option, are underlain by geologic units assigned low or no paleontological potential. In these areas, construction is unlikely to result in impacts on paleontological resources; therefore, impacts would be less than significant. However, the southern and western portions of the project site and portions of the potential South Grade Road sewer line option are underlain by a geologic unit with moderate paleontological sensitivity. Due to this sensitivity, ground-disturbing construction activities could result in impacts on paleontological resources (**Impact-CUL-2**). Any proposed excavation activities that extend deep enough to encounter previously undisturbed deposits have the potential to impact the paleontological resources possibly preserved underground. In these areas, construction activities are expected to include grading, digging, and excavation to prepare the site, build the active recreation facilities, and build the parking lots and infrastructure; as well as building the berm along the southeastern and southern boundaries of the site. To reduce the potential impact during construction activities, implementation of a paleontological resource mitigation program during ground-disturbing activities is required (**MM-GEO-1**).

Operation

Operation of the project may include ground-disturbing work, such as irrigation repairs and additional landscaping. However, operational maintenance would involve shallow ground disturbance, whereas cultural resources are typically found deeper underground. As such, operation of the project would not have the potential to result in impacts on paleontological resources.

Impact Determination

The project would result in potential impacts on paleontological resources.

Impact-CUL-2: Potential Impact on Paleontological Resources. Ground-disturbing activities that would extend deep enough to encounter deposits in the southern and western portions of the project site would have the potential to impact paleontological resources.

Mitigation Measures

MM-GEO-1: Implement a Paleontological Resource Mitigation Program. Ground-disturbing construction activities in the southern and western portion of the project site shall be subject to paleontological and geologic resource sensitivity screening prior to commencement of construction. The resource sensitivity screening shall determine which ground-disturbing activities would be deep enough to encounter previously undisturbed deposits of the Lusardi Formation. County DPR shall retain a Qualified Paleontologist who shall oversee paleontological monitoring by a qualified Paleontological Monitor or cross-trained Paleontological/ Archaeological monitor during ground-disturbing activities. The paleontological monitoring shall include the following measures:

- A Qualified Paleontologist shall attend the preconstruction meeting(s) to consult with the grading and excavation contractors or subcontractors concerning excavation schedules, paleontological field techniques, and safety issues.
- A Qualified Paleontologist or Paleontological Monitor or cross-trained Paleontological/ Archaeological Monitor shall be on site, on a full-time basis, during ground-disturbing activities that occur 10 feet or more below ground surface, to inspect exposures for contained fossils. The Paleontological Monitor shall work under the direction of the project's Qualified Paleontologist. A "Paleontological Monitor" shall be defined as an individual selected by the Qualified Paleontologist who has experience in monitoring excavation and the collection and salvage of fossil materials.
- If fossils are discovered on the project site, the Qualified Paleontologist shall recover them and temporarily direct, divert, or halt grading to allow recovery of fossil remains.
- The Qualified Paleontologist shall be responsible for the cleaning, repairing, sorting and cataloguing of fossil remains collected during the monitoring and salvage portion of the mitigation.
- The Qualified Paleontologist shall deposit and donate prepared fossils, along with copies of all pertinent field notes, photos, and maps, in a scientific institution with permanent paleontological collections, such as the San Diego Natural History Museum, approved by County DPR.
- Within 30 days after the completion of excavation and pile-driving activities, a final data recovery report shall be completed by the Qualified Paleontologist and submitted to County DPR for review and approval. The final report shall document the results of the mitigation and shall include discussions of the methods used, stratigraphic section(s) exposed, fossils collected, and significance of recovered fossils.

Level of Significance After Mitigation

The implementation of **MM-GEO-1** would require the implementation of a Paleontological Resource Mitigation Program, which would prevent impacts on paleontological resources, and if fossils are unexpectedly discovered, would require the proper handling and recording of such fossils. Therefore, the implementation of **MM-GEO-1** would reduce **Impact-CUL-2** to less than significant.

Threshold 3: The project would not disturb any human remains, including those interred outside of formal cemeteries.

County Park and Trails and Open Space

Impact Discussion

Construction

The development of recreational activities must take into consideration potential impacts on cultural resources resulting from public access and increased public use at the entire project site. It is recommended that County DPR avoid, as much as possible, developing trails, staging areas, or other recreation areas that would allow for an increase in public access to or through sites. Trail development and maintenance activities may impact subsurface deposits, and the increase in traffic and accessibility may create direct impacts through vandalism, looting, or the inadvertent destruction of artifacts and site integrity.

Ground-disturbing activities associated with construction of the project could potentially result in the discovery of previously unidentified human remains (**Impact-CUL-3**). Should previously undiscovered resources be identified they should be avoided where feasible. Any eligible sites that cannot be avoided in the development of the project site should be capped as a preservation measure. As a result of the potential for inadvertent damage or destruction of undisturbed human remains, the project has the potential to disturb any human remains, including those interred outside of formal cemeteries (**Impact-CUL-3**). Therefore, the project has the potential to result in a significant impact on human remains resources. Mitigation measures regarding cultural resources can also be used to mitigate any potential impacts on human remain resources. These mitigation measures consist of the preparation of a cultural resources monitoring and discovery plan (**MM-CUL-1**), cultural resources awareness training (**MM-CUL-2**), and conducting archaeological monitoring (**MM-CUL-3**) in areas where soils are previously undisturbed, would be necessary to reduce impacts to a less-than-significant level. Please refer to Section 4.18, *Tribal Cultural Resources,* for impacts and mitigation measures associated with tribal cultural resources.

Operation

Operations may include ground-disturbing work, such as irrigation repairs and additional landscaping. However, operational maintenance would involve shallow ground disturbance, whereas human remains are typically found deeper underground. Additionally, the areas where such operations would occur would be disturbed by construction where monitoring would be involved. Therefore, in the absence of ground disturbances, no operations-related impacts on human remains resources are expected to occur.

Impact Determination

Impact-CUL-3: Potential to disturb any human remains, including those interred outside of formal cemeteries. Excavation of the project has the potential to unearth and damage human remains during construction of the project. Therefore, implementation of the project may cause a substantial adverse effect on human remains as defined in CEQA Guidelines Section 15064.5. Impacts would be potentially significant.

Mitigation Measures

MM-CUL-1: Prepare and Implement a Cultural Resources Monitoring and Discovery Plan. Prior to the commencement of any ground-disturbing activities within previously undisturbed soils within the project area, County DPR shall retain a qualified archaeologist (pre-approved by County DPR) who meets the Secretary of the Interior's Professional Qualification Standards (36 Code of Federal Regulations [CFR], Part 61) to prepare a Cultural Resources Monitoring and Discovery Plan (CRMDP) for the project area. Procedures to follow in the event of an unanticipated discovery apply to all project components. The CRMDP shall be submitted to County DPR, as applicable based on the jurisdiction wherein the project component is located, and shall be reviewed and approved by County DPR, the relevant agency. If County DPR does not have in-house expertise to review the CRMDP, they shall respectively hire an expert who meets the Secretary of the Interior's Professional Qualification Standards (36 CFR 61) and County DPR shall pay for said expert prior to the commencement of any ground-disturbing activities within the areas requiring archaeological monitoring.

County DPR's CRMDP review shall ensure that appropriate procedures to monitor construction and treat unanticipated discoveries are in place. County DPR's review and approval of the CRMDP shall occur prior to the commencement of any construction activities subject to the requirements of the CRMDP. The CRMDP shall include required qualifications for archaeological monitors and supervising archaeologists and shall lay out protocols to be followed in relation to cultural resources, including both archaeological and tribal cultural resources. The CRMDP shall provide a summary of sensitivity for buried cultural resources. In addition, it shall describe the roles and responsibilities of archaeological and Native American monitors, County DPR, and construction personnel. The CRMDP shall describe specific field procedures to be followed for archaeological monitoring, including field protocol and methods to be followed should there be an unanticipated archaeological discovery. Evaluation of resources, consultation with Native American individuals, tribes and organizations, treatment of cultural remains and artifacts, curation, and reporting requirements shall also be described. The CRMDP shall also delineate the requirements, procedures, and notification processes in the event that unanticipated human remains are encountered.

The CRMDP shall delineate the area(s) that require archaeological monitoring. Mapping of the area(s) shall be made available to County DPR, who shall incorporate this information into the respective construction specifications for the project.

MM-CUL-2: Prepare and Implement a Cultural Resources Awareness Training Prior to Project Construction. Prior to, and for the duration of, project-related ground disturbance County DPR shall hire a qualified archaeologist, who meets the Secretary of the Interior's Professional Qualifications Standards (36 CFR 61) and approved by County DPR to provide cultural resources awareness training to project construction personnel. The training shall

include a discussion of applicable laws and penalties under the law; samples or visual representations of artifacts that might be found in the project vicinity; and the steps that must be taken if cultural resources are encountered during construction, including the authority of archaeological monitors, if required to be on site during the project, to halt construction in the area of a discovery.

The cultural resources awareness training shall be conducted by a qualified archaeologist. A hard copy summary of cultural resources laws, discovery procedures, and contact information shall be provided to all construction workers. Completion of the training shall be documented for all construction personnel, who shall be required to sign a form confirming they have completed the training. The form shall be retained by County DPR to demonstrate compliance with this mitigation measure.

MM-CUL-3: Conduct Archaeological and Native American Monitoring.

An archaeological monitor or cross-trained archaeological/paleontological monitor and a Native American monitor shall be retained to observe all initial ground-disturbing activities, including brush clearance, vegetation removal, grubbing, grading, and excavation. The archaeological monitor shall meet the qualification standards of the California Office of Historic Preservation and shall be overseen by an archaeological principal investigator. The Native American monitor shall be selected from among the Native American groups identified by the NAHC as having affiliation with the project area. Prior to the start of ground-disturbing activities, the archaeological monitor shall conduct paleontological and cultural resources sensitivity training for all construction personnel. The Native American monitor or a representative shall be given the opportunity to participate. Construction personnel shall be informed of the types of paleontological or archaeological resources that may be encountered, and of the proper procedures to be enacted in the event of an inadvertent discovery of fossils, archaeological resources, or human remains. County DPR shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance.

Archaeological monitoring shall be conducted by an archaeologist familiar with the types of archaeological resources that could be encountered within the project site and, if possible, who is cross-trained in paleontological resource identification. The qualified archaeologist, in coordination with County DPR and Native American monitor, may reduce or discontinue monitoring if it is determined that the possibility of encountering buried archaeological deposits is low based on observations of soil stratigraphy or other factors. Both the archaeologist and Native American monitor shall be empowered to halt or redirect ground-disturbing activities away from the vicinity of a discovery until the qualified archaeologist or paleontologist has evaluated the discovery and determined appropriate treatment. If prehistoric archaeological materials are encountered, the Native American monitor shall participate in any discussions involving treatment and subsequent mitigation.

The archaeological monitor shall keep daily logs detailing the types of activities and soils observed, and any discoveries. After monitoring has been completed, the qualified archaeologist shall prepare a monitoring report that details the results of monitoring. The report shall be submitted to County DPR and any Native American groups who request a copy. A copy of the final report shall be filed at the SCIC. Monitoring actions and procedures shall be completed per the CRMDP described in **MM-CUL-1**.

Level of Significance After Mitigation

Impact-CUL-3 would be reduced to a less-than-significant level after implementation of **MM-CUL-1** through **MM-CUL-3**, which would ensure preparation and implementation of a CRMDP and Cultural Resources Awareness Training, as well as archaeological and Native American monitoring.

Open Space

Impact Discussion

Open space~~/preserve~~ areas will remove areas and trails that are presently used by the public for a variety of purposes such as trail riding, hiking, dirt bike riding, and gatherings that could have the potential to impact previously identified cultural resources. The removal of some of these areas from active use near existing cultural resources would protect previously identified cultural resources from additional impacts. Use of existing trails for hiking, horseback riding, and biking would have minimal ground disturbance and therefore ~~little~~low to no potential to impact undiscovered or buried cultural resources.

Impact Determination

~~Impact Determination~~

Open space~~/preserve~~ uses would not result in significant impacts on cultural resources as no significant resources have been identified in areas of proposed hiking, horseback riding, or biking trails. Use of these trails would not result in ground disturbance that would impact buried undiscovered cultural resources; therefore, impacts on significant undiscovered cultural resources would not occur.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

4.5.5 Summary of Significant Impacts

Table 4.5-1. Summary of Significant ~~Aesthetics and Visual~~Cultural Resources Impacts and Mitigation Measures

Summary of Potentially Significant Impact(s)	Summary of Mitigation Measure(s)	Level of Significance After Mitigation	Rationale for Finding After Mitigation
Impact-CUL-1: **Potential to Unearth and Damage Significant Archaeological Resources During Construction**	**MM-CUL-1: Prepare and Implement a Cultural Resources Monitoring and Discovery Plan.** **MM-CUL-2: Prepare and Implement a Cultural Resources Awareness Training Prior to Project Construction.** **MM-CUL-3: Conduct Archaeological and Native American Monitoring**	Less than Significant	**Impact-CUL-1** would be reduced to less than significant after implementation of **MM-CUL-1 through MM-CUL-3**, which would ensure preparation and implementation of a CRMDP and Cultural Resources Awareness Training, as well as archaeological and Native American monitoring.
Impact-CUL-2: Potential to directly or indirectly destroy a unique paleontological resource or site or unique geological feature	**MM-GEO-1: Implement a Paleontological Resource Mitigation Program**	Less than Significant	**Impact-CUL-2** would be reduced to less than significant after implementation of **MM-GEO-1**, which would require paleontological and geologic resource sensitivity screening prior to commencement of construction the development and implementation of a paleontological resource mitigation program during ground-disturbing activities.
Impact-CUL-3: Potential to disturb human remains, including those interred outside of formal cemeteries	**MM-CUL-1: Prepare and Implement a Cultural Resources Monitoring and Discovery Plan.** **MM-CUL-2: Prepare and Implement a Cultural Resources Awareness Training Prior to Project Construction.** **MM-CUL-3: Conduct Archaeological and Native American Monitoring**	Less than Significant	**Impact-CUL-3** would be reduced to less than significant after implementation of **MM-CUL-1** through **MM-CUL-3**, which would ensure preparation and implementation of a CRMDP and Cultural Resources Awareness Training, as well as archaeological and Native American monitoring.