

2.2 Cultural Resources

An archaeological survey of the 1,416.5-acre Hoskings Ranch Proposed Project Site was conducted by Mary Robbins-Wade, who is on the County of San Diego's list of approved consultants for the preparation of cultural resource studies. The resulting report, entitled, Cultural Resources Assessment for the Hoskings Ranch Project, Julian, San Diego County, California TM 5312RPL3, Log. No. 03-10-005, with a revision date of July 2013, is included as Appendix C to this DEIR/FEIR. The current archaeological assessment is based upon the work of Professional Archaeology Associates that was done in 2003.

2.1.72.2.1 Existing Conditions

The Proposed Project is bounded by SR 78/79 on the north and large lot residential uses on the north and east. The Cleveland National Forest extends through the site on the southwest and west. The western boundaries abut private land holdings within the Cleveland National Forest.

Archaeological research has pieced together a succession of cultures that have developed in the San Diego region. The earliest accepted archaeological evidence of Native Americans in the San Diego area is the culture of San Dieguito people, dating back to approximately 10,000 years ago. The artifacts associated with this culture consist primarily of scrapers, scraper planes, choppers, large blades, and large projectile points. The San Dieguito culture was gradually replaced by the La Jolla culture, hunters and gatherers with a heavy emphasis on plant and plant seed processing, as evidenced by abundant manos and metates (grinding tools and sites). The Late Prehistoric period is represented by the San Luis Rey culture in northern San Diego and the Cuyamaca culture in the southern portion of the county. The boundary dividing these cultures runs approximately east to west through Escondido. The southern group, the Yuman-speaking *lipay-Kumeyaay*, occupied the region in which the Hoskings Ranch site is located.

The *lipay-Kumeyaay* subsistence economy included hunting, fishing and gathering, but the bulk of their diet was provided by plant foods. Settlements such as permanent villages and campsites are located in oak woodland valleys and catchment basins in the coastal zone, the foothills, the Peninsular Range and, to a lesser extent, in the desert beyond. Resource extraction and processing sites are clustered around the settlements, with temporary camps and extractive sites located in more distant areas. Seasonal movements within a communally-owned village territory were practiced; these movements were directly related to the changing availability of critical resources.

Spanish contact began with the Cabrillo expedition in 1542 which explored portions of the coast and the Channel Islands to the north. At the time of European contact, ancestors of the modern-day Kumeyaay Indians occupied an area that presently includes southern San Diego County, the southern two-thirds of Imperial County, and northern Baja California.

Between the 1860s and the early 1900s, successive waves of pioneers moved into more remote areas of the county in search of land and minerals. The discovery of gold in the Julian area during this period led to the historic settlement of San Diego's mountainous east county. The development of Julian and the surrounding areas closely followed this mining town development.

This brief history illustrates the rather high potential for finding cultural resources on the Proposed Project Site. Records searches for the area revealed approximately 150

potential pre-historic and historic archaeological sites of significance within a mile of the site. Most of the archaeological sites include bedrock milling features with and without artifacts. The historic archaeological resources include remnants of homesteads and ranches, as well as bridge and road foundations, feed troughs, and corrals.

The Proposed Project Site has been a cattle ranch since the 1880s, when the land was first homesteaded, and only ceased to be used for cattle within recent years.

2.1.7.12.2.1.1 Regulatory Framework

A number of criteria are used in demonstrating resource importance. Specifically, criteria outlined in the California Environmental Quality Act (CEQA), the Resource Protection Ordinance (RPO), and the San Diego County Local Register provide the guidance for making such a determination.

CEQA section 15064.5a provides criteria for determining that a resource is a historically significant resource. CEQA section 15064.5b defines the determination of ‘substantial adverse change’ to a resource which engenders impacts. Section 15064.5c of CEQA applies to effects on archaeological sites and contains additional provisions regarding archaeological sites. Sections 15064.5 (d) and (e) contain additional provisions regarding human remains as well as Native American human remains. The San Diego County Local Register of Historical Resources provides criteria for resources assessed for local importance, as opposed to statewide or regional importance.

The San Diego County RPO provides its own definitions for “Significant Prehistoric or Historic Sites.”

Section 1.3, “Applicable Regulations,” of the Cultural Resources report for the Proposed Project provides further details about these regulations.

2.1.82.2.2 Analysis of Project Effects and Determination as to Significance

The studies included record searches, field visits, and limited site testing. Previous studies of the site were supplemented with a review of historic maps and photographs.

Forty-five historic and archaeological resources were identified on the Hoskings Ranch site. Thirty-three sites are recorded as prehistoric (pre-contact) Native-American sites, seven are historic period resources, and five sites include both historic and prehistoric material. The historic resources include remnants of homesteads and ranches, as well as bridge and road foundations and water troughs.

In addition, several ranching features within the Proposed Project area have been recorded as a non-contiguous historic district (P-37-031748).

Analysis of Proposed Project effects relates to significance according to sets of criteria from both the RPO and CEQA. RPO significance is a higher level of significance than that which is recognized under CEQA. This includes sites or districts that are eligible for or listed on the National Register of Historic Places (not just the California Register of Historical Resources); locally or regionally unique cultural resources with a significant volume and range of data and material; traditional cultural properties; sites of ritual, ceremonial, or sacred value to an ethnic group; sites containing human remains. See pages 24 through 31 of the cultural resources assessment for the full list of criteria for each.

2.1.8.12.2.2.1 Historical Resources

Guidelines for the Determination of Significance

The guidelines for the Proposed Project were derived from the County of San Diego Guidelines for Determining Significance, Cultural Resources: Archaeological and Historic Resources. The Proposed Project would have a significant impact on historic resources if it:

1. Causes a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the State CEQA Guidelines.
2. Proposes activities or uses damaging to, and fails to preserve, significant historical cultural resources as defined by the Resource Protection Ordinance.

Analysis

Guideline 1: The project causes a substantial adverse change in the significance of an historical resource as defined in Section 15064.5 of the State CEQA Guidelines.

Seven sites within the Proposed Project area have been recorded as historic period resources. See Table 2-2-1, “Historical Resources (CEQA),” at the end of this chapter for the list of resources.

CA-SDI-16,852H and CA-SDI-16,871H were recorded and documented and their remaining cultural value is not significance. P-37-025435, the car body, is not significant due to its lack of association with other sites or records. CA-SDI-16,853H, CA-SDI-16,345H, P-37-025402, and P-37-030448 will be located in open space and will not be directly or indirectly impacted by the project.

The Hoskings Ranch Rural Landscape District (P-37-031748) is proposed to recognize the importance of historic ranching features on the site and to provide for review of future actions by the Historic Site Board. The resource is made up of two pioneer farmstead archaeological sites (CA-SDI-7098/H and CA-SDI-16,881H), two ranching water development sites (CA-SDI-16,863H and CA-SDI-19,345H), one ranching erosion control site (P-37-030448), and a wooden cattle corral (P-37-125402). These features reflect human modification of the landscape, and can be linked thematically to specific processes in the evolution of the property to create a unified whole that provides an increased understanding of the region’s history. The two house sites represent the pioneer settlement of San Diego County’s backcountry during the late 19th century, while the other features represent the property’s development and use as a cattle ranch.

~~These historic resources are located within areas proposed for open space protection. For those resources located in open space, long-term direct and indirect impacts are not significant. However,~~ brushing and grading activities associated with the construction of the Proposed Project could result in the discovery of previously unrecorded, potentially significant historical resources. Impacts to such cultural resources would be significant (**Impact CR-1**). Therefore, Guideline 1 is exceeded and mitigation is required.

Guideline 2: Proposes activities or uses damaging to, and fails to preserve, significant historical cultural resources as defined by the Resource Protection Ordinance.

See Table 2-2-2, “Historical Resources (RPO),” at the end of this chapter for a list of RPO-significant resources on the subject property.

The significant historic resources placed in open space protection (see table) would not receive direct, long-term impacts from implementation of the Proposed Project. However, brushing and grading activities associated with the construction of the Proposed Project could result in the discovery of previously unrecorded, potentially significant historical resources. Impacts to such cultural resources would be significant (**Impact CR-2**). Therefore, Guideline 2 is exceeded and mitigation is required.

2.1.8.22.2.2 **Archaeological Resources**

Guidelines for the Determination of Impact Significance

The Proposed Project would have a significant impact on archaeological resources if it:

1. Causes a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5 of the State CEQA Guidelines.
2. Proposes activities or uses damaging to, and fails to preserve, significant cultural resources as defined by the Resource Protection Ordinance.
3. Disturbs any human remains, including those interred outside of formal cemeteries.

Analysis

The survey identified 33 prehistoric sites, and five sites that contain both historic and prehistoric elements. Thirty-four of these sites were either determined to be significant or are assumed significant in the absence of testing.

Guideline 1: The project causes a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5 of the State CEQA Guidelines.

Five sites within the Proposed Project area contain historic and prehistoric archaeological elements, as listed in Table 2-2-3, “Historical/Archaeological Resources (CEQA),” at the end of this chapter.

These historical/archaeological sites would be placed in open space and would not receive direct or indirect long-term impacts from the Proposed Project. However, brushing and grading activities associated with the construction of the Proposed Project could result in the discovery of previously unrecorded archaeological resources. Impacts to such cultural resources would be significant (**Impact CR-3**). Therefore, Guideline 1 is exceeded and mitigation is required.

CA-SDI-16,881 contains important information potential that is being lost as the site erodes away from exposure to the elements (**Impact CR-4**). Mitigation would be required.

Thirty-three prehistoric Native American archaeological sites have been identified within the Proposed Project area, as shown in Table 2-2-4, “Archaeological Resources (CEQA),” at the end of this chapter.

Impacts to the following sites have been reduced to a level below significant through their documentation and recordation (and testing if applicable): CA-SDI-7110, CA-

SDI-16,865, CA-SDI-16,873, CA-SDI-17,057. As such, these sites are unlikely to yield further information important to understanding the prehistoric occupation of the Proposed Project area.

Because these sites have been documented and recorded, they are determined to not be significant, Guideline 1 is not exceeded, impacts are not significant, and no mitigation is required.

Guideline 2: The project proposes activities or uses damaging to, and fails to preserve, significant cultural resources as defined by the Resource Protection Ordinance.

All of the historic/archaeological as well as archaeological-only resources listed under Guideline 1, above, are assumed RPO-significant in the absence of testing; four of these (CA-SDI-7098H, CA-SDI-16,854, CA-SDI-16,881H, and CA-SDI-16,863H) assume significance from being part of a historic ranching district. All of these resources are located in open space protection. However, brushing and grading activities associated with the construction of the Proposed Project could result in the discovery of previously unrecorded historical/archaeological or archaeological resources. Impacts to such cultural resources would be significant (**Impact CR-5**). Therefore, Guideline 1 is exceeded and mitigation is required.

Guideline 3: Disturbs any human remains, including those interred outside of formal cemeteries

None of the cultural resources identified on the Proposed Project Site contain human remains and therefore no impacts to human remains would result from the Proposed Project. However, brushing and grading activities associated with the construction of the Proposed Project could result in the discovery of previously unrecorded, potentially significant human remains. Impacts to such cultural resources would be significant. (**Impact CR-6**). Guideline 3 is exceeded and mitigation is required.

2.1.92.2.3 Cumulative Impact Analysis

According to CEQA, the importance of cultural resources comes from the research value and the information that they contain. Therefore, the issue that must be explored in a cumulative analysis is the cumulative loss of information. For sites considered less than significant, there is no information, or the information is preserved through recordation, test excavations, and preservation of artifacts. Significant sites that are placed in protected open space easements avoid direct impacts to these cultural resources as well as preservation of their potential research data. Significant sites that are not placed within open space easements and which are directly impacted by the Proposed Project preserve the information through recordation, test excavations, and data recovery programs that would be presented in reports and filed with the County and SCIC.

Based on the current study, 45 historic and archaeological resources have been identified within the Proposed Project area. Thirty-three sites are recorded as prehistoric (pre-contact) Native-American sites, seven are historic period resources, and five sites include both historic and prehistoric material.

Four archaeological sites, through documentation and recordation, have been reduced to a level of no significance (CA-SDI-7110, CA-SDI-16,865, CA-SDI-16,873, and CA-SDI-17,057). One of these (CA-SDI-16,865) would be impacted by the Proposed Project. No mitigation would be required and impacts would not contribute to a cumulative effect. The three remaining archaeological resources are located within the open space.

One resource, CA-SDI-16,871, was found to not meet the criteria for listing in the California Register of Historical Resources through documentation and recordation.

The remaining 40 resources located onsite are RPO-significant. Two historic resources, CA-SDI-7105/7106 and CA-SDI-16,881/H, were determined to be RPO-significant by the archaeologist. The remaining 38 resources are assumed to be RPO-significant in the absence of testing. The majority of these are placed in open space protection, but possible effects from grading activities create the need for mitigation. One historic resource, P-37-030448, is not located within open space protection. Impacts are considered significant, as this site is an element of the significant historic ranching district (P-37-031748), and mitigation is required.

The Proposed Project's potentially significant impacts to cultural resources would be reduced below a level of significance by archaeological monitoring by a County-approved archaeologist and a Native American monitor during grading. Similarly, impacts to any undiscovered or buried potentially significant cultural resources located within the Proposed Project's boundaries would be reduced below a level of significance by similar measures. Thus, all archaeological impacts from the Proposed Project, when reviewed with related cumulative projects in the area, do not contribute to a cumulatively significant impact.

The Proposed Project is located in the west-facing slopes of the Volcan Mountains in the Julian Planning area. The cumulative study area encompasses an approximate one-mile radius to the east and west along this mountain range to incorporate areas of possible prehistoric occupancy. Case file research at the County of San Diego based on this cumulative study area was conducted to determine cumulative impacts. [The results of that research are shown in Table 1-1 of the DEIR/FEIR. Impacts are noted in the right hand column. The table indicates that of the 90 projects reviewed, five have the potential to impact cultural resources. No other projects were noted in the County of San Diego data base as having impacts to archaeology.](#) TPM 20863 has been withdrawn. MUP 72-460-72, a Girls Scout Camp, had impacts to archaeology that were mitigated with open space preservation. SP 03-015, the Leroux residence in downtown Julian, was studied but did not have significant impacts. [MUP 77-113, the Julian sewer plant, was studied but had no impacts to archaeology.](#) MUP 97-005, Red Horse Winery, had the potential to impact archaeology, but a Negative Declaration was issued. The Proposed Project itself has the potential to impact one resource, as mentioned above. Mitigation is proposed to reduce this impact to below significance. [County records for the 90 projects were reviewed. No other projects were noted in the County of San Diego data base as having impacts to archaeology.](#)

Cultural impacts have been avoided to the greatest extent possible in the region, evidenced by the small number of past, present, or anticipated projects in the 90 project study list that have cultural resource impacts. [Projects fully mitigate their impacts or use the project design to avoid impact altogether.](#) Future development in the cumulative study area would be subject to similar analysis and mitigation requirements pursuant to CEQA and RPO. Based on the compliance of the Proposed Project and related projects within the cultural resources cumulative study area with CEQA and RPO, and implementation of the project monitoring measures, the Proposed Project would not result in a significant contribution to cumulative impacts for the issue of cultural resources and impacts would be less than significant.

2.1.10.2.4 Significance of Impact Prior to Mitigation

The following is a brief summary of all direct and indirect impacts which were determined to be significant by the analysis provided in the Cultural Resources Assessment (Appendix C).

2.1.10.12.2.4.1 Impacts to Historical Resources

- CR-1 Historic resources, as defined in Section 15064.5 of the State CEQA Guidelines, located within open space would not suffer direct impacts from the Proposed Project. However, brushing and grading activities associated with the construction of the Proposed Project could result in the discovery of previously unrecorded, potentially significant historical resources. Impacts to such cultural resources are significant. Mitigation is required.
- CR-2 RPO-significant resources located in areas that are proposed for open space protection. However, brushing and grading activities associated with the construction of the Proposed Project could result in the discovery of previously unrecorded, potentially RPO-significant resources. Impacts to such cultural resources would be significant.

2.1.10.22.2.4.2 Impacts to Archaeological Resources

- CR-3 Historical/archaeological sites located in areas that are proposed for open space would not receive direct or indirect long-term impacts from the Proposed Project. However, brushing and grading activities associated with the construction of the Proposed Project could result in the discovery of previously unrecorded historical/archaeological resources. Impacts to such cultural resources would be significant.
- CR-4 CA-SDI-16,881 is a historic trash deposit that contains important information potential that is being lost as the site erodes away from exposure to the elements.
- CR-5 All of the study's historical/archaeological and archaeological resources are assumed to be RPO-significant in the absence of testing; a few also assume significance in association with a historic ranching district. These resources are all located in areas proposed for open space protection and would not receive long-term direct and indirect impacts from the Proposed Project. However, brushing and grading activities associated with the construction of the Proposed Project could result in the discovery of previously unrecorded, potentially RPO-significant archaeological resources. Impacts to such cultural resources would be significant.
- CR-6 None of the cultural resources identified on the Proposed Project Site contain human remains. However, brushing and grading activities associated with the construction of the Proposed Project could result in the discovery of previously unrecorded, potentially significant human remains. Impacts to such cultural resources would be significant.

2.1.11.2.5 Mitigation

2.1.11.12.2.5.1 M-CR-1, M-CR-2, M-CR-3, M-CR-5, M-CR-6

A monitoring program would be implemented for any grading or other ground-disturbing activity. The monitoring program would be required not only for ground-disturbing activities as part of the Tentative Map, but also any development that occurs subsequent to approval of the TM. The monitoring and data recovery program must be provided to the satisfaction of the Director of Planning and Development Services, and must include monitoring by a County-approved archaeologist and a Native American monitor. Appendix C provides details about the requirements of the monitoring program which address data discovery, recovery, and documentation; notes to the Grading Plan; and necessary sign-offs and documentation proving adherence to the program.

The archaeological consultant, County staff, and Native American representatives will work together to determine the disposition of any Native American cultural material collected, determining if some material would be repatriated rather than curated, taking into account the definitions under NAGPRA. Historic era cultural material collected would be curated.

Additionally, a temporary fencing and signage plan would be implemented along the perimeter of the open space during periods of construction activity to ensure that workers and equipment do not inadvertently encroach into the open space and onto any of the archaeological sites.

The monitoring program and the fencing and signage plan designed for the Proposed Project as described above would effectively mitigate all impacts to below a level of significance because they would deter intrusions into protected areas. No further mitigation would be required.

2.1.11.22.2.5.2 M-CR-24

Although the Proposed Project is not directly responsible for the eroding condition of CA-SDI-16,881/H, mitigation for this impact would be a condition of project approval. A data-recovery excavation would be conducted to collect a sample of cultural material. This material would be cataloged and analyzed, and a report would be prepared to detail the methods and results of the data-recovery program.

2.1.12.2.6 Conclusion

For the current study, a County-approved archaeological firm reviewed previous surveys and assessment reports, conducted site visits and limited testing, and updated the archaeological report for the Proposed Project.

Forty-five historic and archaeological resources were identified within the Proposed Project area. Thirty-three of these sites were recorded as prehistoric (pre-contact) Native-American sites, seven are historic period resources, and five sites include both historic and prehistoric material.

Impacts could occur during grading activities because additional resources may be uncovered. To avoid impacts to known and as-yet-undiscovered cultural resources during grading activities, an archaeological ~~and~~ Native American monitor is required to conduct archaeologicalgrading monitoring to ensure no additional resource areas are

damaged. Temporary fencing and signage would be installed to deter inadvertent intrusions to the open space by construction workers or equipment.

In the long-term, open space is an effective design feature because resources would be retained in an undisturbed state in a protected area.

Impacts to cultural resources are not significant because the project has avoided resources, fully mitigated impacts, and has provided open space protections for resources. One resource, CA-SDI-16,881/H, is eroding naturally, and would continue to do so after Project implementation. The Proposed Project would be required to implement a data recovery program which would mitigate for all impacts to this resource. Monitoring would ensure that unknown cultural resources would be adequately documented, and curated [or repatriated](#) if necessary, because monitors would halt grading and evaluate resources, if any are found.

Cumulative impacts are not significant because the Proposed Project and other cumulative projects have avoided or preserved resources on their sites. Impacts are mitigated to below a level of significance.

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Historical Resources (CEQA)

CA-SDI-16, 852H <u>882H</u>	Quarry site for mining red earth for bricks; no artifacts observed <u>School site</u>
CA-SDI-16,853H	Scatter of sun-purple glass and porcelain
CA-SDI-16,871H	Mining pit, possibly looking for gold.
CA-SDI-19,345H	Three water troughs, rock wall to stabilize pad
P-37-025402	Starr Corral; unique construction from railroad boxcars
P-37-025435	Partial car body and association parts
P-37-030448	Historic water control features (rock walls) in main drainage and two minor cuts feeding the main drainage; connects with well at CA-SDI-16,863/H



Historical Resources (CEQA)

**Table
2-2-1**

Historical Resources (RPO)

Resource #	Status of significance	Placed in Open Space
CA-SDI-16,853H	Assumed significant in the absence of testing.	Yes
CA-SDI-19,345H	Not individually significant, but part of a significant historic ranching district.	Yes
P-37-025402	Determined to be significant; also part of significant historic ranching district.	Yes
P-37-030448	Determined to be significant; also part of significant historic ranching district.	No



Historical Resources (RPO)

**Table
2-2-2**

Historical/Archaeological Resources (CEQA)

CA-SDI-7098H	Bedrock Milling Features (BMF) with ground stone, flaked stone, Tizon Brown Ware, and historic components of the McCain Residence homesite.
CA-SDI-16,863/H	This site includes a well at a natural spring and is part of the ranching features that are proposed as noncontiguous historic district, which would make them significant resources as defined by CEQA.
CA-SDI-16,881/H	BRMs and lithic scatter. Historic component: Late 19th century/early 20th century homestead site with landscape features, foundation, wall, trash dump, and scattered historic artifacts.
CA-SDI-16,882/H	Small lithic and pottery scatter. Historic component: site of early 20th century Orinoco School.
CA-SDI-19,344	BRMs with flakes, amethyst glass.



Historical/Archaeological Resources (CEQA)

**Table
2-2-3**

Archaeological Resources (CEQA)

CA-SDI-7102	This is a large habitation site with a range of artifact types. The historical aspect of this site meets the criteria of CEQA and is eligible for listing in the California Register of Historical Resources.
CA-SDI-7103	BRMs along Orinoco Creek; flakes found at one feature.
CA-SDI-7104	BRMs; no artifacts observed.
CA-SDI-7105/7106	BRMs
CA-SDI-7109	This a large habitation site. The historical aspect of this site meets the criteria of CEQA and is eligible for listing in the California Register of Historical Resources.
CA-SDI-7110	Isolated scraper.
CA-SDI-16,851	BRMs with flake and Tizon Brown Ware.
CA-SDI-16,854	BRMs with ground stone, flakes, and hammerstones.
CA-SDI-16,855/ CA-SDI-16,856/ CA-SDI-16,857	BRMs with ground stone, flaked stone (including obsidian), Tizon Brown Ware, historic.
CA-SDI-16,858	BRMs with a mano.
CA-SDI-16,859	BRMs with a flake.
CA-SDI-16,860	BRMs, no artifacts observed.
CA-SDI-16,861	BRMs with flakes
CA-SDI-16,862	BRMs with a flake.
CA-SDI-16,864	MRMs with mano and Tizon Brown Ware.
CA-SDI-16,865	BRM with a flake.
CA-SDI-16,866	BRMs with a flake and Tizon Brown Ware.
CA-SDI-16,867	BRMs with no artifacts observed.
CA-SDI-16,868	BRMs with Tizon Flat Ware.
CA-SDI-16,869	BRM with no artifacts observed.
CA-SDI-16,870	BRMs with manos, flakes, and Tizon Brown Ware.
CA-SDI-16,872	BRMs with no artifacts observed.
CA-SDI-16,873	BRM with a flake.
CA-SDI-16,874	BRMs with no artifacts observed.
CA-SDI-16,875	BRMs with manos and Tizon Brown Ware.
CA-SDI-16,876/ CA-SDI-16,877	Lithic scatters and BRMs.
CA-SDI-16,878	Habitation debris, including flaked stone, Desert Side-Notched point, Tizon Brown Ware, Colorado Buff Ware, incised fired clay whale effigy.
CA-SDI-16,879	BRMs with no artifacts observed.
CA-SDI-16,880	BRM with Tizon Brown Ware.
CA-SDI-17,057	BRM with no artifacts observed.
CA-SDI-19,342	BRMs with flakes.
CA-SDI-19,343	BRMs with no artifacts observed.
CA-SDI-19,346	BRMs with no artifacts observed.



Archaeological Resources (CEQA)

**Table
2-2-4**