

## SUBCHAPTER 2.5

### CULTURAL RESOURCES

## **2.5 Cultural Resources**

Data regarding cultural resources were obtained through a literature review, record search and field survey conducted by Gallegos & Associates as detailed in the July 2007 Cultural Resource Report (see Appendix H).

### **2.5.1 Discussion of Existing Conditions Relating to Cultural Resources**

Eight previously recorded cultural resource sites (CA-SDI-4370, -4371, -4558, -5639, -5640, -9253, -9822, -10747H), one isolate (SDM-W-3880C) and one Historic Location are located in the proposed project boundary and off-site improvement areas. In addition, two newly recorded cultural resource sites (CA-SDI-17264 and CA-SDI-17265); and one new isolate (P-37-025968) were identified within the Merriam SP area. Sites CA-SDI-4370, CA-SDI-4371, CA-SDI-5639, and CA-SDI-5640 are all milling stations that have been destroyed by development, and therefore are not identified as significant resources. The two isolates that have been identified within the project site (SDM-W-3880C and P-37-025968) do not constitute a site according to the State of California and therefore are not considered significant. Sites CA-SDI-9253, -10747H, -17264, and -17265 were tested and identified as not significant. Sites CA-SDI-4558 and CA-SDI-9822 have been previously tested and identified as significant under the County of San Diego and California Environmental Quality Act (CEQA) criteria. On the basis of human remains and a pictograph feature at CA-SDI-9822, and that CA-SDI-4558 was identified as eligible for placement on the National Register of Historic Places, both sites are identified as significant. The 1901 historic structure/location identified within the project site is also identified as a significant resource; if present, subsurface privies, refuse dumps and architectural foundations could provide information on early homesteading in north San Diego County. Subsequent field-testing at these sites conducted by Gallegos & Associates in March 2004 redefined site boundaries.

#### **Previously Recorded Sites**

CA-SDI-4370. Site CA-SDI-4370 was not relocated and appears to have been destroyed by previous grading for housing and ranch development. The site was originally recorded as a single milling slick.

CA-SDI-4371. Site CA-SDI-4371 was originally recorded as a milling slick and was not relocated within the project area. The majority of CA-SDI-4371 is located outside of the proposed project area, and it is likely that the feature has been destroyed by construction of a road or is located outside of the proposed project site.

CA-SDI-4558. Site CA-SDI-4558 was relocated during the current study, and two additional bedrock milling features were identified. This site appears to be in the same condition as reported by Cook et al. (1977). One foundation was identified in the central portion of the site, and another foundation was identified adjacent to the north of the site. Both foundations appear to be the remains of residential structures that were described by Cook et al. (1977). Disturbance noted includes foot traffic, the construction of Deer Springs Road, construction of houses, paved access roads, grading, agricultural use, and trash dumping.

CA-SDI-5639. Site CA-SDI-5639 was originally recorded as a milling site. The site was not relocated and appears to have been destroyed as a result of the construction of Twin Oaks Valley Road and the San Diego Aqueduct.

CA-SDI-5640. Site CA-SDI-5640 was originally recorded as a single milling site. The site was not relocated, as it has been destroyed by the development of Twin Oaks Valley Road.

CA-SDI-9253. Site CA-SDI-9253 was originally recorded as a multiple bedrock milling features consisting of several slicks. The site was relocated during the current survey. Four bedrock milling features and debitage were noted. A portion of the site has been impacted by the construction of a post-1930s homestead (see site CA-SDI-10747H), however the majority of the site appears to be in good condition.

CA-SDI-9822. Site CA-SDI-9822 was relocated during the current survey. Bedrock milling features and the rock with the red pigment pictograph were relocated. Surface artifacts noted includes debitage, pottery, a ceramic pipe, and burned bone. Rodent disturbance, modern trash dumping and foot traffic were also noted. A protective fence installed by Palomar College is still in place around most of the site area; however the fence has been partially torn down along Deer Springs Road. The southern portion of site, north of Deer Springs Road, is currently eroding into the road.

CA-SDI-10747H. Site CA-SDI-10747H was relocated adjacent to site CA-SDI-9253, and includes the remains of a house, a collapsed wood structure, and a rock and mortar hearth/chimney structure. Disturbance at the site includes foot traffic on the adjacent trail, minor trash dumping, and some off-road vehicle activity.

SDM-W-3880C. The isolate was identified within a highly disturbed graded dirt road and no additional cultural materials were located.

Historic Structure. The location for a historic structure, identified on the 1901 Escondido and San Luis Rey USGS maps, was not relocated and the structure appears to have been destroyed. If present, privy pits, refuse dumps, and architectural foundations may be present on-site and could provide information on early homesteading in north San Diego County.

### **Newly Recorded Sites**

CA-SDI-17264. Site CA-SDI-17264 consists of a lithic scatter located in the southwest portion of the project area. This site consists of a single bifacial mano and three debitage within a dirt road. Because of the dense vegetation, the site boundary is unknown.

CA-SDI-17265. Site CA-SDI-17265 consists of a single bedrock milling feature located in the west portion of the project area, within a flat valley. The single milling feature consists of a large slick, approximately 60 cm by 30 cm in area. No surface artifacts were noted. Disturbance noted included off-road vehicle use adjacent to the site.

P-37-025968. Isolate P-37-025968 was located within the northeast off-site improvement area. This isolate is a single piece of debitage that was collected. No features or additional artifacts were noted.

### **2.5.2 Guidelines for the Determination of Significance**

The following guidelines of significance will be considered substantial evidence that a significant impact to cultural resources would occur if:

- 1) The project, as designed, causes a substantial adverse change in the significance of an historical or archaeological resource as defined in Section 15064.5 of the State CEQA Guidelines;
- 2) The project is inconsistent with the County RPO relative to prehistoric and historic sites;
- 3) The project, as designed disturbs any human remains, including those interred outside of formal cemeteries.

#### Guideline Sources:

The identified guidelines for significant cultural resource impacts are based on the County Guidelines, including the RPO, and CEQA Appendix G Guidelines.

Guideline No. 1 was chosen because Sections 21083.2 of CEQA and 15064.5 of the State CEQA Guidelines require evaluation of whether or not a proposed action would have a significant effect on unique archaeological resources. Any project that would have an adverse (direct or indirect) impact on significant cultural resources would be considered a significant impact, pursuant to the cited sections.

Guideline No. 2 was chosen because both Section 15064.5 of the CEQA Guidelines and the County RPO require evaluation of whether or not a proposed action would have a significant effect on unique historical resources (sites and structures). The County RPO does not allow non-exempt activities or uses damaging to significant prehistoric or historic lands on properties under County jurisdiction unless completed for a scientific investigation. The project is required to be in conformance with applicable County standards related to County cultural resources, including the noted RPO criteria on prehistoric and historic sites. Non-compliance would result in a project that is inconsistent with County standards.

Guideline No. 3 was included due to the potential for ceremonial/habitation activity (and resultant burials) based on the presence of pictographs in the vicinity and CEQA Guidelines Section 15064.5(d) and the Native American Graves Protection and Repatriation Act (Publication 101-601).

### **2.5.3 Analysis of Project Effects and Determination of Significance**

Six sites (CA-SDI-4558, CA-SDI-9253, CA-SDI-9822, CA-SDI-10747H, CA-SDI-17264, and CA-SDI-17265) were tested to determine site significance, in compliance with County of San Diego and CEQA guidelines. Sites CA-SDI-4370, CA-SDI-4371, CA-SDI-5639, and CA-SDI-5640 were not tested, as these sites have been destroyed by development, mismapped, and/or located outside of the project area. Isolates finds (P-37-025968 and SDM-W-3880C) were identified as not significant. The 1901 historic structure/location is identified as significant; if present, privy pits, refuse dumps, and architectural foundations could provide information on early homesteading in north San Diego County. The testing program, for all sites except the 1901 historic structure/location, included a review of previous work, surface collection, documentation of milling features, excavation of Shovel Test Pits (STP) and test units, artifact analysis, and a determination of site significance.

*Guideline 1: Change in Significance to an Historical or Archaeological Resource*

Given the poor site integrity, and low amount of artifacts (human made items) and ecofacts (non-human made tools, such as shell, bone and plant seeds) recovered, sites CA-SDI-9253, CA-SDI-10747H, CA-SDI-17264, and CA-SDI-17265 are identified as not significant under County of San Diego and CEQA criteria. Sites CA-SDI-4370, CA-SDI-4371, CA-SDI-5639, and CA-SDI-5640 are milling stations that have been destroyed by development and as such are also identified as not significant under County of San Diego and CEQA criteria.

Sites CA-SDI-4558 and CA-SDI-9822 are identified as significant under County of San Diego and CEQA. The 1901 historic structure/location is also identified as significant under CEQA. The proposed project has the potential to disturb or damage these sites.

CA-SDI-4558. Site CA-SDI-4558 is located within the proposed development impact area and is classified as significant under CEQA and County of San Diego RPO criteria. A portion of this site would be directly impacted by Deer Springs Road improvements (Impact CR-1). The remainder of this site would be avoided and placed within an open space easement; however, indirect impacts would occur from construction, increased accessibility, and the potential for pot-hunters/looters (Impact CR-2).

CA-SDI-9822. Site CA-SDI-9822 is located within the proposed development area and is identified as significant under CEQA and RPO criteria. Portions of this site would be directly impacted by Deer Springs Road improvements (Impact CR-3). The remainder of this site would be avoided and placed within an open space easement. Indirect impacts from increased accessibility and the potential for pot-hunters/looters would result to the remainder of this site from implementation of improvements to Deer Springs Road (Impact CR-4).

1901 Historic Structure/Location. The 1901 historic structure/location is within the proposed project development impact area. The 1901 historic structure/location was not relocated and the structure appears to have been destroyed, however, this site is identified as significant under CEQA as subsurface features may be present that can provide information on early homesteading in northern San Diego County. Potential direct impacts may result from proposed grading activities (Impact CR-5).

Isolates SDM-W-3880C and P-37-025968 do not constitute a site by State of California definition and therefore are identified as not significant.

Senate Bill 18. The Native American Heritage Commission was contacted to request information and/or input regarding Native American concerns either directly or indirectly associated with the Merriam Mountains project as well as names of individuals in the area who should be contacted prior to completion of this study. Those individuals identified by the Native American Heritage Commission were contacted by letter, and information as to cultural resources within the project area was requested (refer to Appendix H of the Cultural Resources Technical Report). A representative from the San Luis Rey Band of Mission Indians and the Pechanga Band of Luiseno Mission Indians have provided monitoring services for survey and test excavation fieldwork conducted. In addition, a meeting at the County of San Diego to address Native American concerns was conducted on November 9, 2004. Senate Bill 18 requires cities and counties to contact, and consult with, California Native American tribes prior to amending or adopting a general plan or specific plan, or designating land as open space. As mentioned above open space easements will be provided for the areas of sites CA-SDI-4558 and CA-SDI-9822 that will not be directly impacted by improvements to Deer Springs Road. The project will continue to coordinate with the Native Americans in regard to the project related cultural resources.

*Guideline 2: Project's Consistency with RPO*

Implementation of the project would result in significant unavoidable impacts to sites CA-SDI-4558 and CA-SDI-9822, which are both considered significant cultural sites under CEQA and the County's RPO. The project design avoids these sites to the extent feasible. As described in Section 1.0, the project proposes an amendment to the RPO. Documentation of the reasons for and conformance to the benefits of the proposed project are detailed in the RMP. With implementation of the proposed project, which includes a RPO amendment, the project would be consistent with RPO.

*Guideline 3: Disturbance to Human Remains*

See responses to *Guidelines for Determination of Significance 1 and 2* above.

#### **2.5.4 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, the information is preserved through recordation and test excavations. Significant sites that are placed in open space easements avoid impacts to cultural resources and also preserve the data. Significant sites

that are not placed within open space easements preserve the information through recordation, test excavations, and data recovery programs that would be presented in reports filed with the County of San Diego and the South Coastal Information Center. The artifact collections from any potentially significant site would be curated at the San Diego Archaeological Center and would be available to other archaeologists to study.

A Cultural Resources Cumulative Impact Study was prepared by Gallegos & Associates for the proposed project (See Appendix H). As part of the study, an evaluation of cumulative impacts was prepared. The cumulative study included a review of cultural resources within a 20 square mile area including the Merriam Project Area and the area within one mile of the Merriam Project Area. Three impact approaches were used (see Appendix R) in order to determine the potential cumulative impacts that would result from implementation of the proposed project: (1) Review of 69 Development Projects, (2) Merriam I-15 Corridor Study and (3) Review of Cultural Resources within one mile of Merriam Project Area.

Each cumulative impact approach included a review of previously recorded sites and archeological studies for the purpose of identifying previously recorded cultural resources; the present status of these resources; and, to relatively determine cumulative impacts to cultural resources. A record search and literature review were completed at the South Coastal Information Center (SCIC) at San Diego State University, as well as at the California Department of Transportation (Caltrans). Fieldwork to revisit sites in order to field-truth the database or correct mismapped resources was not conducted.

Approach 1 included a review of 69 developments, of which only 16 of the 69 development projects discuss cultural resources. Given these 16 projects few if any identify cultural resources, impacts or mitigation measures. On the basis of the unevenness of these 69 development reports, cumulative impacts could not be quantified and evaluated. Approach 2 included a review of I-15, of which a total of 7,820 acres were reviewed for previous work and previously recorded cultural resources. Approximately 1,160 acres have been previously studied; however, 6,660 acres have not been previously studied. For the I-15 Corridor, cumulative impacts are noted for non-significant cultural resources; however, sites identified as significant have for the most part been avoided of direct impacts. Lastly, Approach 3 included a review of cultural resources within one mile of the Merriam Project Area. A total of 34 cultural resource sites and three isolate finds have been recorded within the proposed project and within one mile of the Merriam project area. Mitigation measures to reduce impacts to these sites to a level below significance are listed below.

A total of 34 cultural resource sites and 3 isolate finds have been recorded within 20 square mile area. The Merriam Project is anticipated to result in impacts to five cultural resource sites (CA-SDI-4558, CA-SDI-9822, CA-SDI-17264, CA-SDI-17265 and Historic Structure); two of which are RPO significant sites (CA-SDI-4558 and CA-SDI-9822) that will be directly impacted by Deer Springs Road. One, cultural resource is not considered RPO significant (Historic Structure) but is CEQA significant and the other two cultural sites (CA-SDI-17264, CA-SDI-17264) were determined to be not significant. The proposed project's impacts to cultural resources would be significant and unavoidable, and mitigation would include a pre-grade and data recovery program, capping, the placement of portions of significant sites within an open space easement, the curation of all artifacts obtained during the testing and data recovery programs, and recordation of all sites within the project footprint. Therefore, because the proposed project would be mitigated to the extent feasible and those projects within the cumulative impact study area are mitigated through the placement of cultural resources within open space easements, data recovery, curation, and/or reporting, the proposed project would not cumulatively contribute to a significant impact to cultural resources.

Cumulative Impacts are also discussed in the Cumulative Technical Report provided as Appendix R of this Draft EIR.

### **2.5.5 Growth Inducing Impact**

As discussed in Section 1.7 and Appendix S of this EIR the growth that would be generated by the project, based on, the maximum units allowable under existing General Plan designations, is estimated to be approximately 720 dwelling units. Development of these units would be subject to normal county review and processing requirements including CEQA review for all project proposals requiring discretionary actions. As part of such CEQA review, it is anticipated that potential cultural resource impacts would be analyzed and addressed for each of these project proposals. Therefore, potential growth inducing impacts to cultural resources would be mitigated as part of future associated discretionary actions, should they occur.

#### *Summary of Impacts*

The following cultural resource impacts have been identified.

CR-1 Direct impacts to a portion of site CA-SDI-4558 due to improvements to Deer Springs Road.

- CR-2 Indirect impacts to site CA-SDI-4558 due to improvements to Deer Springs Road and increased accessibility with the implementation of the proposed project.
- CR-3 Direct impacts to a portion of site CA-SDI-9822 due to improvements to Deer Springs Road.
- CR-4 Indirect impacts to site CA-SDI-9822 due to improvements to Deer Springs Road and increased accessibility with the implementation of the proposed project.
- CR-5 Direct impact to potential features that may be present at the 1901 historic structure/location.

### **2.5.6 Mitigation Measures**

The following mitigation measures have been provided to minimize the cultural resource impacts discussed above. It should be noted that the following mitigation measures shall be assured through the RMP prepared for the proposed project.

- M-CR-1a Site CA-SDI-4558 - Prior to approval of grading plans the project applicant shall contract with a County certified archaeologist to implement a grading monitoring and data recovery program to the satisfaction of the Director of Planning and Land Use (DPLU) and the research design detailed in the Cultural Resources Report, prepared by Gallegos and Associates, dated July 2007. Verification of the contract shall be presented in a letter form from the Project Archaeologist to the Director of DPLU. This program shall include, but not limited to the following:
1. The consulting archaeologist shall contract with a Native American Observer to be involved with the grading and monitoring program.
  2. During the original cutting of previously undisturbed deposits, the archaeological monitor(s) (and Native American Observer) shall be onsite depending on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features.
  3. In the event that previously unidentified potentially significant cultural resources are discovered, the archaeologist shall have the authority to divert or temporarily halt ground disturbance operation in the area of discovery to allow evaluation of potentially significant cultural resources. The County Archaeologist must concur with the evaluation before construction activities will be allowed to resume in the affected area. For significant cultural

resources, a Research Design and Data Recovery Program to mitigate impacts shall be prepared by the consulting archaeologist and approved by the County Archaeologist, then carried out using professional archaeological methods. If any human bones are discovered, the County Coroner shall be contacted. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant, as identified by the Native American Heritage Commission, shall be contacted in order to determine proper treatment and disposition of the remains.

4. Before construction activities are allowed to resume in the affected area, the artifacts shall be recovered and features recorded using professional archaeological methods. The archaeological monitor(s) and Native American Observer shall determine the amount of material to be recovered for an adequate artifact sample for analysis.
5. In the event that previously unidentified cultural resources are discovered, all cultural material collected during the grading monitoring program shall be processed and curated according to current professional repository standards. The collections and associated records shall be transferred, including title, to an appropriate curation facility within San Diego County, to be accompanied by payment of the fees necessary for permanent curation.
6. In the event that previously unidentified cultural resources are discovered, a report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed and submitted to the satisfaction of the Director of Planning and Land use prior to the issuance of any building permits. The report will include Department of Parks and Recreation Primary and Archaeological Site forms.
7. In the event that no cultural resources are discovered, a brief letter to that effect shall be sent to the Director of Planning and Land Use by the consulting archaeologist that the grading monitoring activities have been completed.
8. The grading monitoring and data recovery program will involve the excavation of 35 1x1-meter units, artifact analysis, special studies, and a report of finding. The grading monitoring and data recovery program completed, along with a re-analysis of previously collected materials, as well as special studies, will provide a database to address research questions in a technical report of findings for this site. The research design includes, but is not limited to the following: (1) The research orientation for the precontact study will focus on chronology, lithic technology, settlement and subsistence strategy, environmental settling, and trade and travel. (2) The research

orientation for the history study will focus on functional pattern recognition, consumerism economic indexing, consumption pattern analysis and dietary studies. All artifacts and ecofacts recovered will be washed, analyzed, and special studies will be completed as needed, which may include lithic, shell, bone, radiocarbon dating, obsidian sourcing, precontact ceramics, protein residue analyses, and historic artifact analyses.

- M-CR-1b All cultural resources except burial-related artifacts and unless otherwise required by law, excavated or removed from prehistoric or historic sites during testing and/or data recovery programs, along with all associated project data, will be permanently curated at a qualified repository as defined by the “State of California Guidelines for the Curation of Archaeological Collections.” Curation includes, but is not limited to, field notes, photographs, catalogues, and final reports. Collections from previous excavations at sites CA-SDI-4558 and CA-SDI-9822 shall be combined with the collection recovered as a result of the current study and any future extended testing and/or data recovery programs. These artifacts and associated documentation are necessary to produce a comprehensive report for sites CA-SDI-4558 and CA-SDI-9822. Additionally, the owner agrees to execute a release of title form and to pay the required curation fees in effect at the time of curation. All curation shall be accomplished within six (6) months from completion of the project.
- M-CR-2a The portion of site CA-SDI-4558 that will be avoided and placed within open space (i.e., indirectly impacted) shall be temporarily fenced around the areas designated as environmentally sensitive if construction activities would occur near the site. Construction equipment shall be directed away from the site, and construction personnel shall be directed to avoid entering the area. Permanent ranch-style fencing shall be installed after road construction to protect that portion of the site not capped for road construction. The portion of the site within the open space easement shall be cleared of non-native vegetation; however, native vegetation will remain. Non-native trees will be cut to level with roots left in place. Non-native grasses and brush will be cleared by hand or weed-whacker. The cement foundation shall be carefully removed, and capping using clean fill soil shall be used to fill in the foundation area. Minor capping, where possible, shall consist of three-to-six inches of clean fill soil. A one-time hydro seeding for shallow-rooted native plants shall provide a protective layer to the site. No underground sprinkler system or water system shall be used to promote vegetation.

- M-CR-2b If necessary, during the construction phase, after-hours monitoring of the open space easements by a private security company will be employed to maintain a high visibility presence and observe through patrols for signs of trespassing, vandalism, pot-hunting, or other site damage; then, taking action and/or reporting any incidents to their client, employer, and the County of San Diego. Significant sites located within open space easements will be managed according to the RMP. Specific activities prohibited within the open space easements should include (but not be limited to) construction of homes and buildings, surface mining activities, industrial uses, and commercial uses. In addition, periodic inspection of the property to verify compliance with the open space easement guidelines should be conducted by the County of San Diego or a qualified archeologist.
- M-CR-3 Site CA-SDI-9882 - Prior to approval of grading plans the project applicant shall contract with a County certified archaeologist to implement a grading monitoring and data recovery program to the satisfaction of the DPLU and the research design detailed in the Cultural Resources Report, prepared by Gallegos and Associates, dated July 2007. Verification of the contract shall be presented in a letter form from the Project Archaeologist to the Director of DPLU. This program shall include, but not limited to the following:
1. M-CR-1a (1 through 7).
  2. The grading monitoring and data recovery program will involve the excavation of 100 1x1-meter sample units, artifact analysis, and reanalysis of previously collected materials completed by the Palomar Community College, special studies and a report of finding. The data recovery, along with a re-analysis of previously collected materials, will provide a database to address research questions in a technical report of findings. The research design includes, but is not limited to the following: (1) The research orientation for the precontact study will focus on chronology, lithic technology, settlement and subsistence strategy, environmental settling, and trade and travel. (2) The research orientation for the history study will focus on functional pattern recognition, consumerism economic indexing, consumption pattern analysis and dietary studies. All artifacts and ecofacts recovered will be washed, analyzed, and special studies will be completed as needed, which may include lithic, shell, bone, radiocarbon dating, obsidian sourcing, precontact ceramics, protein residue analyses, and historic artifact analyses. Mitigation measure M-CR-1b shall also be implemented to mitigate this direct impact.

- M-CR-4 Indirect impacts to Site CA-SDI-9822 shall be mitigated through temporary fencing and minor capping as needed. The temporary fencing shall be constructed around the areas designated as environmentally sensitive, if construction activities would occur near the site. Construction equipment shall be directed away from the site, and construction personnel shall be directed to avoid entering the area. Minor capping as needed shall consist of three-to-six inches of clean soil and shall only cover the surface of the site; however, the pictograph feature shall not be capped, and to the extent possible, the bedrock milling features shall not be capped. Seeding for shallow-rooted native plants shall be used within the boundaries to provide a protective layer to the site. Photo documentation and re-analysis of the pictograph feature shall also be conducted by a professional archaeologist. Mitigation measure M-CR-1b shall also be implemented to mitigate this indirect impact.
- M-CR-5 For the 1901 historic structure location, a pre-grade and data recovery program shall be completed to locate buried features, analysis of materials recovered, and completion of a report of findings. This plan shall include a controlled backhoe excavation to determine the presence and/or absence of buried historic resources. If subsurface features and artifacts are identified, then a data recovery program shall be conducted and include manual excavations of 3-by-3-foot recovery units followed by block excavations and feature excavations if necessary, as well as an analysis of artifacts. Special studies may include, but will not be limited to glass, ceramic, metal and faunal analysis to address the research questions posed. Mitigation measure M-CR-1b shall also be implemented to mitigate this direct impact.

### **2.5.7 Conclusion**

Implementation of the project would result in significant unavoidable impacts to sites CA-SDI-4558 and CA-SDI-9822 (Impact CR-1 and CR-3), which are both considered significant cultural sites under CEQA and the County's RPO. Implementation of M-CR-1a, M-CR-1b and M-CR-3 would include a grading monitoring and data recovery program; however impacts would remain significant and unavoidable because portions of the cultural sites would be directly impacted during roadway improvements. As described in Section 1.0, the project proposes an amendment to the RPO. Documentation of the reasons for and conformance to the benefits of the proposed project are detailed in the RMP. With implementation of the proposed project, which includes a RPO amendment, the project would be consistent with RPO. Indirect impacts to sites CA-SDI-4558 and CA-SDI-9822 have been identified as Impact numbers CR-2 and CR-4. Mitigation

measures M-CR-2a, M-CR-2b and M-CR-4 would reduce indirect impacts to a level below significance through measures such as the placement of temporary fencing to prevent access to the sites and minor capping. An alternative alignment for the construction of Deer Springs Road has been provided in Section 5.7 to this EIR. The alternative alignment for Deer Springs Road would include capping a portion of the cultural resource sites located within the roadway alignment and impacts under this alternative would be mitigated through a data recovery program for portions of the sites that would not be capped. The impact to 1901 historic structure/location is identified as Impact CR-5. Mitigation measure M-CR-5 would reduce impacts to these resources to below a level of significance because data recovery would allow historic information to be obtained prior to removal.