CULTURAL RESOURCES INVENTORY: INDEPENDENT ENERGY SOLUTIONS, INC. (IES)/ SAN DIEGO GAS & ELECTRIC (SDG&E) SOLAR ENERGY PROJECT — RAMONA SAN DIEGO COUNTY, CALIFORNIA PDS2014-MUP-14-013; ENV. LOG NO. PDS2014-ER-14-09-003

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HELIX Project No. MEA-01

NATIONAL ARCHAEOLOGICAL DATA BASE INFORMATION

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Report Date:	May 2015
Report Title:	Cultural Resources Inventory: Independent Energy Solutions, Inc. (IES)/San Diego Gas & Electric (SDG&E) Solar Energy Project -- Ramona, San Diego County, California. PDS2014-MUP-14-013; Env. Log No. PDS2014-ER-14-09-003
Type of Study:	Archaeological survey
New Sites:	None
Updated Sites:	None
USGS Quadrangles:	Ramona (7.5' series)
Acreage:	Survey area approx. 24 acres; MUP 18.3 acres
Keywords:	Negative archaeological survey; County of San Diego; Ramona/Santa Maria Valley; Township 13 South, Range 1 East, unsectioned

LIST OF ACRONYMS

APN	Assessor Parcel Number
CEQA	California Environmental Quality Act
IES	Independent Energy Solutions, Inc.
kV	Kilovolt
Local Register	San Diego County Local Register of Historical Resources
MUP	Major Use Permit
NAHC	Native American Heritage Commission
PV	Photovoltaic
RPO	Resource Protection Ordinance
SCIC	South Coastal Information Center
SEP	Solar Energy Project
SDG&E	San Diego Gas & Electric
The County	County of San Diego

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(Bound Separately — Not for Public Review)

EXECUTIVE SUMMARY

Independent Energy Solutions, Inc. (IES), the Project applicant, is preparing a Major Use Permit (MUP) application for development and operation of a photovoltaic (PV) solar facility to be located on San Diego Gas and Electric (SDG&E)-owned property. IES has been contracted to engineer and obtain permits for the Solar Energy Project (SEP) Ramona facility, which will be owned by SDG&E. The Project would require approval of an MUP by the County of San Diego (County) to allow for the construction, operation, and maintenance of the facilities for the long-term generation of solar energy.

The proposed Project site is located in the north-central part of San Diego County, California and is southeast of the Ramona Village Center. The Project site is located east of San Vicente Road, south of Hanson Lane, and is bordered by Creelman Lane on the south and Ashley Road to the east. The County Assessor Parcel Number (APN) is 284-340-35. The Project is in an unsectioned portion of Township 13 South, Range 1 East in the former Valle de Santa Maria land grant, on the USGS 7.5' Ramona quadrangle.

The cultural resources study consisted of an archaeological survey of the Project site, including proposed array location, access, and a buffer around the proposed array. The cultural resources survey was conducted by Affinis with Native American monitoring provided by Red Tail Monitoring and Research. The cultural resources study included contacting the Native American Heritage Commission (NAHC) and the Native American community and was conducted in accordance with County Guidelines to address cultural resources per the California Environmental Quality Act (CEQA) and County guidelines. As addressed in Chapter 3.1 Methods, per direction from County staff the field survey included the project impact area plus a buffer but did not include the entire 37-acre parcel.

A records search was conducted at the South Coastal Information Center (SCIC) in April 2013 for the Project site and a one-mile radius of the Project site. No cultural resources have been identified within or adjacent to the Project site. The Project is in the Santa Maria Valley, an area that is generally rich in cultural resources, although only 11 archaeological sites have been recorded within one mile of the Project. A Sacred Lands File check was conducted at the Native American Heritage Commission in April 2013. The NAHC has no record of sacred places/sites in the immediate vicinity of the Project site. The Viejas Tribal Historic Preservation Officer has indicated that the Ramona area is rich in cultural resources and is of importance to the people of Viejas.

The Project is expected to have no impacts to cultural resources. However, given the presence of alluvial soils, there is a potential for subsurface cultural resources that are not evident on the surface. In addition, the Project site is located in an area with a great deal of archaeological and cultural sensitivity. Therefore, a monitoring program is required and must be implemented for any grading, trenching, or other-ground-disturbing activity, as detailed in Chapter 5.0 Management Considerations – Mitigation Measures and Design Considerations.

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1.0 INTRODUCTION

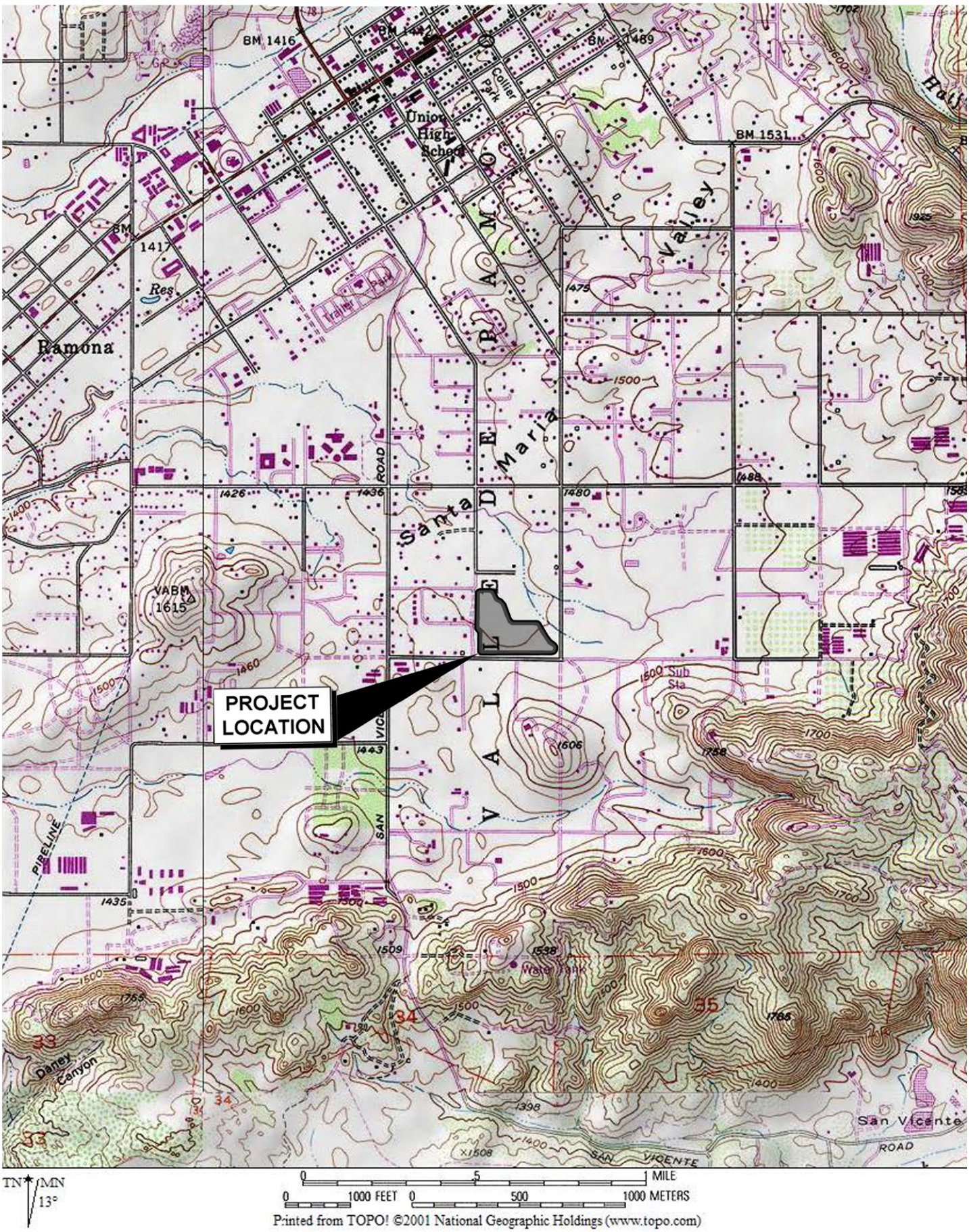
1.1 Project Description

The proposed Project site is located in the north-central part of San Diego County (County), California and is southeast of the Ramona Village Center (Figure 1). The Project site is located east of San Vicente Road, south of Hanson Lane, and is bordered by Creelman Lane on the south and Ashley Road to the east (Figure 2). The County Assessor Parcel Number (APN) is 284-340-35. The Project is in an unsectioned portion of Township 13 South, Range 1 East in the former Valle de Santa Maria land grant, on the USGS 7.5' Ramona quadrangle (Figure 2).

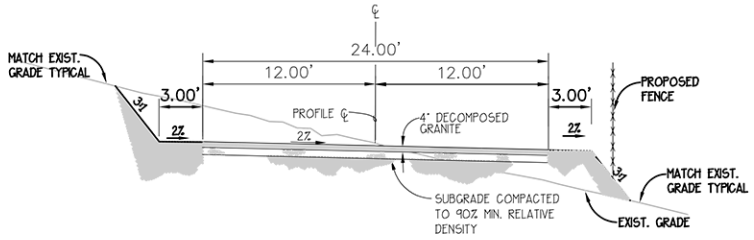
Independent Energy Solutions, Inc. (IES), the Project applicant, is preparing a Major Use Permit (MUP) application for development and operation of a photovoltaic (PV) solar facility to be located on San Diego Gas and Electric (SDG&E)-owned property. IES has been contracted to engineer and obtain permits for the Solar Energy Project (SEP) facility, which will be owned by SDG&E. The Project would require approval of an MUP by the County to allow for the construction, operation, and maintenance of the facilities for the long-term generation of solar energy.

The proposed PV solar facility would be constructed in one phase on a 37.2-acre parcel to achieve the intended megawatt output; however, the development area would be limited to approximately 18.3 acres of the parcel; the remaining acreage would remain in its present undeveloped state (see Figure 3). The Project design consists of mono-crystalline or poly-crystalline silicon cell photovoltaic solar modules mounted on fixed tilt system supported by a ground mount system. In isolated cases where geotechnical constraints are encountered, an appropriate foundation system would be used. The modules would be mounted on racks ranging from approximately 13 ft. long by 13.5 ft. wide to 45.5 ft. long by 13.5 ft. wide. Power stations, inverters, alternating current, switchgear and medium voltage transformers would be sited at two locations within the module array. Electrical power from the proposed Project would be routed to an existing 12 kilovolt (kV) pad-mounted switchgear adjacent to the fire access road on the west side of the solar array. The 12 kV switchgear would be connected by underground cables to an interconnect pole within an existing road and utility easement adjacent to the western boundary of the proposed Project site. The 50-ft. tall interconnect pole would replace an existing 45-ft. tall pole. A trench, approximately 60 ft. long, three ft. wide, and four ft. deep would be required for the underground wires. The work area for trenching would be approximately 20 ft. wide and 60 ft. long. Temporary construction access into the project site would be provided by an existing unpaved driveway from Ashley Road in the southeast corner of the project site (see Figure 3). This driveway will be removed at the end of the construction period. Permanent access into the site would be from Creelman Lane in the southwest corner of the site as shown on Figure 3. An 8-ft.-high chain link fence will be installed around the perimeter of the MUP area, and a double gate will be located at the driveway entrance from Creelman Lane. Landscape screening is proposed to be installed around the perimeter of the Project site; a variety of plant materials are proposed.

Affinis Shadow Valley Center 810 Jamacha Rd. Suite 206 El Cajon, CA 92019	Regional location in San Diego County	Figure 1



Affinis 810 Jamacha Road Suite 206 El Cajon, CA 92019	Project location on USGS 7.5' Ramona quadrangle	Figure 2



A TYPICAL SECTION - PERIMETER FIRE ACCESS ROAD

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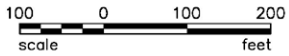

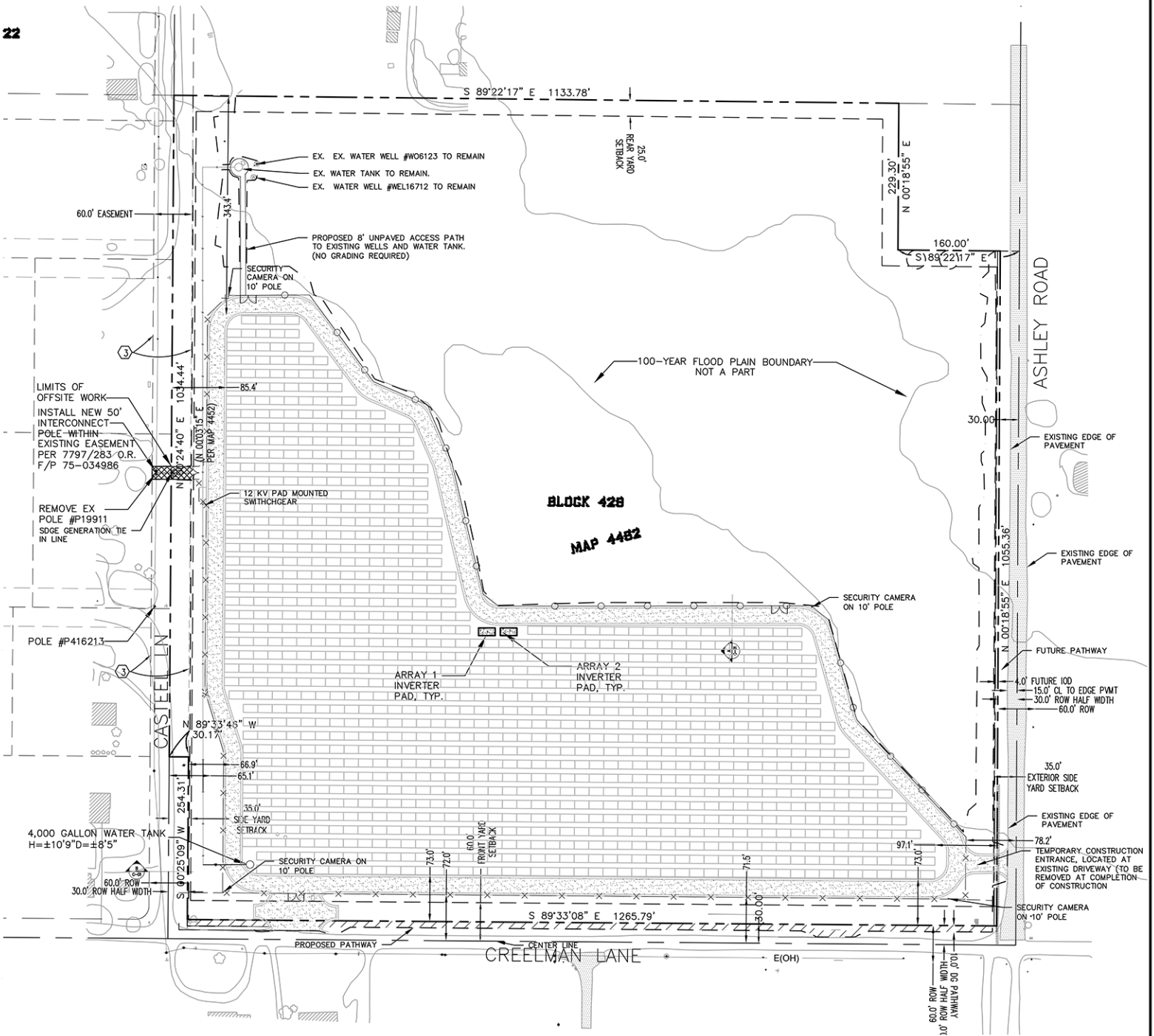

Affinis 810 Jamacha Road Suite 206 El Cajon, CA 92019	Project Plan	Figure 3

The cultural resources study consisted of an archaeological survey of the Project site, including proposed array location, access, and a buffer around the proposed array (see Chapter 3.1 Methods). The survey area consisted of approximately 24 acres, 18.3 acres of which is the MUP. The remaining portion of the 37.2-acre parcel was not surveyed, as it will remain undeveloped. Affinis Director of Cultural Resources, Mary Robbins-Wade, served as the project manager/ principal investigator. Andrew Giletti was the field director. Clint Linton of Red Tail Monitoring and Research and the Santa Ysabel Ipay Nation was the Native American representative.

1.2 Existing Conditions

1.2.1 Environmental Setting

Natural Environment

The Project is in the foothills of north-central San Diego County, in an area characterized as “Mediterranean hot summer” (Griner and Pryde 1976: Figure 3.4). The average January low temperature for the area is approximately 37° F (Griner and Pryde: Figure 3.2) and the average July high temperature is approximately 90° F (Griner and Pryde 1976: Figure 3.1). Average annual rainfall is 15 in. (Griner and Pryde 1976: Table 3.1). Geologically, the Project site, and the Santa Maria Valley in general, is underlain by Cretaceous Japatul Valley tonalite (Todd et al. 2006). Soil types mapped within and adjacent to the Project include clayey alluvial land, Placentia sandy loam (2 to 9 percent slopes), and Fallbrook sandy loam (5 to 9 percent slopes) (Bowman 1973). These soil types support a range of plant species, “chiefly annual grasses, oak or broadleaf chaparral, and intermittent areas of chamise” in the Fallbrook series soils (Bowman 1973:46); “a few scattered oaks, soft chess, wild oats, filaree, chamise, and vinegarweed” in the Placentia series soils (Bowman 1973:68). Vegetation on clayey alluvial land is “mainly chaparral and annual grasses and forbs” (Bowman 1973:40). These vegetation communities and plant species are known to have been used by Native populations for food, shelter, tools, ceremonial uses, etc. (see Christenson 1990; Hedges and Beresford 1986; Luomala 1978). The vegetation communities would have supported a number of animal species also used by the Native peoples.

Cultural Environment

General Culture History

Several summaries discuss the prehistory of San Diego County and provide a background for understanding the archaeology of the general area surrounding the Project. Moratto's (1984) review of the archaeology of California contains important discussions of Southern California, including the San Diego area, as does a recent book by Neusius and Gross (2007). Bull (1983, 1987), Carrico (1987), Gallegos (1987), and Warren (1985, 1987) provide summaries of archaeological work and interpretations, and a relatively recent paper (Arnold et al. 2004) discusses advances since 1984. The following is a brief discussion of the culture history of the San Diego region.

Carter (1957, 1978, 1980), Minshall (1976) and others (e.g., Childers 1974; Davis 1968, 1973) have long argued for the presence of Pleistocene humans in California, including the San Diego area. The sites identified as "early man" are all controversial. Carter and Minshall are best known for their discoveries at Texas Street and Buchanan Canyon. The material from these sites is generally considered nonartifactual, and the investigative methodology is often questioned (Moratto 1984).

The earliest accepted archaeological manifestation of Native Americans in the San Diego area is the San Dieguito complex, dating to approximately 10,000 years ago (Warren 1967). The San Dieguito complex was originally defined by Rogers (1939), and Warren published a clear synthesis of the complex in 1967. The material culture of the San Dieguito complex consists primarily of scrapers, scraper planes, choppers, large blades, and large projectile points. Rogers considered crescentic stones to be characteristic of the San Dieguito complex as well. Tools and debitage made of fine-grained green metavolcanic material, locally known as felsite, were found at many sites that Rogers identified as San Dieguito. Often these artifacts were heavily patinated. Felsite tools, especially patinated felsite, came to be seen as an indicator of the San Dieguito complex. Many archaeologists felt that the San Dieguito culture lacked milling technology and saw this as an important difference between the San Dieguito and La Jolla complexes. Sleeping circles, trail shrines, and rock alignments have also been associated with early San Dieguito sites. The San Dieguito complex is chronologically equivalent to other Paleoindian complexes across North America, and sites are sometimes called "Paleoindian" rather than "San Dieguito". San Dieguito material underlies La Jolla complex strata at the C. W. Harris site in San Dieguito Valley (Warren, ed. 1966).

The traditional view of San Diego prehistory has the San Dieguito complex followed by the La Jolla complex at least 7000 years ago, possibly as long as 9000 years ago (Rogers 1966). The La Jolla complex is part of the Encinitas tradition and equates with Wallace's (1955) Millingstone Horizon, also known as Early Archaic or Milling Archaic. The Encinitas tradition is generally "recognized by millingstone assemblages in shell middens, often near sloughs and lagoons" (Moratto 1984:147). "Crude" cobble tools, especially choppers and scrapers, characterize the La Jolla complex (Moriarty 1966). Basin metates, manos, discoidals, a small number of Pinto series and Elko series points, and flexed burials are also characteristic.

Warren et al. (1961) proposed that the La Jolla complex developed with the arrival of a desert people on the coast who quickly adapted to their new environment. Moriarty (1966) and Kaldenberg (1976) have suggested an in situ development of the La Jolla people from the San Dieguito. Moriarty has since proposed a Pleistocene migration of an ancestral stage of the La Jolla people to the San Diego coast. He suggested this Pre-La Jolla complex is represented at Texas Street, Buchanan Canyon, and the Brown site (Moriarty 1987).

Since the 1980s, archaeologists in the region have begun to question the traditional definition of San Dieguito people simply as makers of finely crafted felsite projectile points, domed scrapers, and discoidal cores, who lacked milling technology. The traditional defining criteria for La Jolla sites (manos, metates, "crude" cobble tools, and reliance on lagoonal resources) have also been questioned (Bull 1987; Cárdenas and Robbins-Wade 1985; Robbins-Wade 1986). There is speculation that differences between artifact assemblages of "San Dieguito" and "La Jolla" sites reflect functional differences rather than temporal or cultural variability (Bull 1987; Gallegos 1987). Gallegos (1987) has proposed that the San Dieguito, La Jolla, and Pauma complexes are manifestations of the same culture, with differing site types "explained by site location, resources exploited, influence, innovation and adaptation to a rich coastal region over a long period of time" (Gallegos 1987:30). The classic "La Jolla" assemblage is one adapted to life on the coast and appears to continue through time (Robbins-Wade 1986; Winterrowd and Cárdenas 1987). Inland sites adapted to hunting contain a different tool kit, regardless of temporal period (Cárdenas and Van Wormer 1984).

Several archaeologists in San Diego, however, do not subscribe to the Early Prehistoric/Late Prehistoric chronology (see Cook 1985; Gross and Hildebrand 1998; Gross and Robbins-Wade 1989; Shackley 1988; Warren 1998). They feel that an apparent overlap among assemblages identified as "La Jolla," "Pauma," or "San Dieguito" does not preclude the existence of an Early Milling period culture in the San Diego region, whatever name is used to identify it, separate from an earlier culture. One problem these archaeologists perceive is that many site reports in the San Diego region present conclusions based on interpretations of stratigraphic profiles from sites at which stratigraphy cannot validly be used to address chronology or changes through time. Archaeology emphasizes stratigraphy as a tool, but many of the sites known in the San Diego region are not in depositional situations. In contexts where natural sources of sediment or anthropogenic sources of debris to bury archaeological materials are lacking, other factors must be responsible for the subsurface occurrence of cultural materials. The subsurface deposits at numerous sites are the result of such agencies as rodent burrowing and insect activity. Various studies have emphasized the importance of bioturbative factors in producing the stratigraphic profiles observed at archaeological sites (see Gross 1992). Different classes of artifacts move through the soil in different ways (Bocek 1986; Erlandson 1984; Johnson 1989), creating vertical patterning (Johnson 1989) that is not culturally relevant. Many sites, which have been used to help define the culture sequence of the San Diego region, are the result of just such nondepositional stratigraphy.

The Late Prehistoric period is represented by the Cuyamaca complex in the southern portion of San Diego County and the San Luis Rey complex in the northern portion of the county. The Cuyamaca complex is the archaeological manifestation of the Yuman forebears of the Kumeyaay people. The San Luis Rey complex represents the Shoshonean predecessors of the ethnohistoric Luiseño. The name Luiseño derives from Mission San Luis Rey de Francia and has been used to refer to the Indians

associated with that mission, while the Kumeyaay people are also known as Ipai, Tipai, or Diegueño (named for Mission San Diego de Alcala). Agua Hedionda Creek is often described as the division between the territories of the Luiseño and the Kumeyaay people (Bean and Shipek 1978; White 1963). The Ramona Project is in the ethnographic territory of the Kumeyaay people.

Elements of the Cuyamaca and San Luis Rey complexes include small, pressure-flaked projectile points (e.g., Cottonwood and Desert Side-notched series); milling implements, including mortars and pestles; *Olivella* shell beads; ceramic vessels; and pictographs (True 1970; True et al. 1974). Of these elements, mortars and pestles, ceramics, and pictographs are not associated with earlier sites. True noted a greater number of quartz projectile points at San Luis Rey sites than at Cuyamaca complex sites, which he interpreted as a cultural preference for quartz (True 1966). He considered ceramics to be a late development among the Luiseño, probably learned from the Diegueño. The general mortuary pattern at San Luis Rey sites is ungathered cremations.

The Cuyamaca complex also differs from the San Luis Rey complex in the following points:

1. Defined cemeteries away from living areas;
2. Use of grave markers;
3. Cremations placed in urns;
4. Use of specially made mortuary offerings;
5. Cultural preference for side-notched points;
6. Substantial numbers of scrapers, scraper planes, etc., in contrast to small numbers of these implements in San Luis Rey sites;
7. Emphasis placed on use of ceramics; wide range of forms and several specialized items;
8. Steatite industry;
9. Substantially higher frequency of milling stone elements compared with San Luis Rey;
10. Clay-lined hearths (True 1970:53-54).

While Juan Rodriguez Cabrillo visited San Diego briefly in 1542, the beginning of the historic period in the San Diego area is generally given as 1769. It was that year that the Royal Presidio and the first Mission San Diego were founded on a hill overlooking Mission Valley. The Mission San Diego de Alcala was constructed in its current location five years later. The Spanish Colonial period lasted until 1821 and was characterized by religious and military institutions bringing Spanish culture to the area and attempting to convert the Native American population to Christianity. Mission San Diego was the first mission founded in Southern California. Mission San Luis Rey, in Oceanside, was founded in 1798. *Asistencias* (chapels) were established at Pala (1816) and Santa Ysabel (1818).

The Mexican period lasted from 1821, when California became part of Mexico, to 1848, when Mexico ceded California to the United States under the treaty of Guadalupe Hidalgo at the end of the Mexican-American War. Following secularization of the missions in 1834, mission lands were given as large land grants to Mexican citizens as rewards for service to the Mexican government. The society made a transition from one dominated by the church and the military to a more civilian population, with people living on ranchos or in pueblos. The Pueblo of San Diego was established during the period, and transportation routes were expanded. Cattle ranching prevailed over agricultural activities.

The American period began in 1848, when California was ceded to the United States. The territory became a state in 1850. Terms of the Treaty of Guadalupe Hidalgo brought about the creation of the Lands Commission in response to the Homestead Act of 1851, which was adopted as a means of validating and settling land ownership claims throughout the state. Few of the large Mexican ranchos remained intact, due to legal costs and the difficulty of producing sufficient evidence to prove title claims. Much of the land that once constituted rancho holdings became available for settlement by immigrants to California. The influx of people to California and to the San Diego region resulted from several factors, including the discovery of gold in the state, the end of the Civil War, the availability of free land through passage of the Homestead Act, and later, the importance of San Diego County as an agricultural area supported by roads, irrigation systems, and connecting railways. During the late nineteenth and early twentieth centuries, rural areas of San Diego County developed small agricultural communities centered on one-room schoolhouses. Such rural farming communities consisted of individuals and families tied together through geographical boundaries, a common schoolhouse, and a church. Farmers living in small rural communities were instrumental in the development of San Diego County. They fed the growing urban population and provided business for local markets. Rural farm school districts represented the most common type of community in the county from 1870 to 1930. The growth and decline of towns occurred in response to boom and bust cycles in the 1880s.

Native American Perspective

In addition to the point of view discussed above, it is recognized that other perspectives exist to explain the presence of Native Americans in the region. The Native American perspective is that they have been here from the beginning, as described by their creation stories. Similarly, they do not necessarily agree with the distinction that is made between different archaeological cultural or periods, such as “La Jolla” and “San Dieguito”. They instead believe that there is a continuum of ancestry from the first people to the present Native American populations of San Diego.

Project Vicinity

The Project is in the Santa Maria Valley. Archaeological work at over 30 archaeological sites in the Santa Maria Valley has suggested that this area was the Late Prehistoric and ethnohistoric rancheria of *Pa’mu* (or Pamo). A number of multiple-component sites

have also been identified, with locations dating from 2000 years ago well into the Spanish period (Carrico and Cooley 2003).

The town of Ramona is within the former Mexican land grant Rancho Valle de Pamo or Rancho Santa Maria. This land grant was given by the governor of California to José Joaquin Ortega and his son-in-law, Edward Stokes in 1843. The land was sold to a series of owners over the next several decades. During the 1870s some of the early homesteaders arrived in the area. The stagecoach route between San Diego and Julian passed through the Santa Maria Valley with a stage stop in the town. In the mid-1880s, land promoter Milton Santee formed the Santa Maria Land and Water Company, which subdivided the town site that became Ramona (the original name of the town was Nuevo). The San Diego and Cuyamaca Railroad ended in Foster, north of Lakeside, and travelers were taken from there by stage to Ramona and on to Banner and Julian. Ranching and farming have been important in Ramona, and at one time the town was known as the “Turkey Capital of the World”, but the turkey industry declined after World War II. Dairies, egg ranches, and other agricultural pursuits were once primary economic forces in the town but are no longer as prominent.

1.2.2 Records Search Results

Records searches were obtained from the South Coastal Information Center (SCIC) at San Diego State University for the Project site and a one-mile radius around it in April 2013 (Confidential Appendix A).

As summarized in Table 1, a total of 13 cultural resources (11 archaeological sites and two historic resources) have been recorded within one mile of the Ramona SEP site. None are recorded within or adjacent to the Project site. Nine of the sites consist of bedrock milling features, generally with no artifacts associated. One site is a scatter of flaked stone artifacts, and one site was described as a village or extended use campsite. The two historic resources are a eucalyptus grove planted in the very early twentieth century with building foundations that appear to post-date 1940 and a farmhouse built circa 1913 with associated outbuildings.

In addition, six historic structural resources are recorded within a one-mile radius, all of which were recorded as part of the Ramona Historical Resources Inventory in 1991. All six are residences (single family homes, farmhouses, and a carriage house converted into a residence). None are located in proximity to the Project site.

Table 1
PREVIOUSLY RECORDED SITES WITHIN A ONE-MILE RADIUS

Site Number	Site Type	Site Dimensions	Site Recorder (Report Reference, when available)
CA-SDI-12,816	Bedrock milling feature	Undetermined (access limited)	G.T. Gross, M. Robbins-Wade, R. Schulz, J. Whitehouse 1992
CA-SDI-13,087	Lithic scatter	45 m x 15 m (2 loci)	R. Collett, F. Pearl, D. Hyland, M. Robbins-Wade 1993
CA-SDI-13,247	Village site (bedrock milling features, lithic scatter, ceramic scatter)	200 m x 100 m	N. Desautels, R. Beer 1993
CA-SDI-15,052	Bedrock milling features	190 m x 95 m	Robbins-Wade and M. Murray 2004 (report- Robbins-Wade 2004: *Archaeological Resources Assessment, CA-SDI-15,052, The Grove, Ramona, San Diego County, California*); S. Wade 1998 (report- Wade 1999: *Velocity Paintball Park: An Inventory and Boundary Assessment for Prehistoric and Historic Resources (County P99-008), Ramona, California*)

Table 1 (cont.)
PREVIOUSLY RECORDED SITES WITHIN A ONE-MILE RADIUS

Site Number	Site Type	Site Dimensions	Site Recorder (Report Reference, when available)
CA-SDI-15,931	Bedrock milling features	2.3 m x 1.6 m	P. McGinnis 2000
CA-SDI-20,334	Bedrock milling feature	4 m x 4 m	C. Willis 2011 (report-Willis and Hale 2011: *Cultural Resources Inventory for the Sol Orchard Project, San Diego County, California*)
CA-SDI-20,338	Bedrock milling feature	3 m x 3 m	C. Willis 2011 (report-Willis and Hale 2011: *Cultural Resources Inventory for the Sol Orchard Project, San Diego County, California*)
CA-SDI-20,339	Bedrock milling feature	6 m x 3 m	C. Willis 2011 (report-Willis and Hale 2011: *Cultural Resources Inventory for the Sol Orchard Project, San Diego County, California*)
CA-SDI-20,340	Bedrock milling feature	5 m x 4 m	C. Willis 2011 (report-Willis and Hale 2011: *Cultural Resources Inventory for the Sol Orchard Project, San Diego County, California*)

Table 1 (cont.) PREVIOUSLY RECORDED SITES WITHIN A ONE-MILE RADIUS			
Site Number	**Site Type**	**Site Dimensions**	**Site Recorder (Report Reference, when available)**
CA-SDI-20,341	Bedrock milling feature	10 m x 15 m	C. Willis 2011 (report-Willis and Hale 2011: *Cultural Resources Inventory for the Sol Orchard Project, San Diego County, California*)
CA-SDI-20,342	Bedrock milling feature	2 m x 1 m	C. Willis 2011 (report-Willis and Hale 2011: *Cultural Resources Inventory for the Sol Orchard Project, San Diego County, California*)
P-37-017277	Historic eucalyptus grove	Not noted	S. Wade 1998 (report-Wade 1999: *Velocity Paintball Park: An Inventory and Boundary Assessment for Prehistoric and Historic Resources*)
P-37-025439	Historic single-family property	Not noted	L. Pierson 2004 (report- Pierson and Smith 2004: *A Historical Evaluation of the Ashley Family Residence at 1455 Ashley Road.*)

Previous Studies

Fifteen archaeological studies have been conducted within a one-mile radius of the Ramona SEP Project site (Table 2). Half of these reports are negative surveys, and one found a single resource. Only one of the reports is for a testing program. One of

the reports presents recommendations for the management of the cultural resources of the Barnett Ranch Open Space Preserve.

Table 2
PREVIOUS STUDIES WITHIN A ONE-MILE RADIUS

Report Name	Author, year	Report Type	Results
Negative Cultural Resources Survey Report for Sunset Vistas	Beddow 2006	Archaeological Overview and Assessment, Archaeological Evaluation Study, Other	No resources found
Ramona Historic Resources Inventory	Carrico and Flanigan 1991	Archaeological Overview and Assessment, Archaeological Evaluation Study, Other	Unknown findings
Ramona Water District Proposed Pipeline Alignment/Preliminary Impact Evaluation of Archaeological Resources	Fulmer 1977	Cultural Resources Management Plan	
Negative Cultural Resources Survey Report for the Dye Road Extension Project, Ramona, CA	Gardner 2009	Archaeological Overview and Assessment, Archaeological Evaluation Study, Other	No resources found
Negative Cultural Resources Survey Report For Johnson TPM 21160	Kwiatkowski 2009	Archaeological Overview and Assessment, Archaeological Evaluation Study, Other	No resources found
Cultural Resources Survey of a 23-Acre Parcel for Ramona Due Diligence Assessment	Maxon, Wesson, Miller, and Steely 2004	Archaeological Overview and Assessment, Other	No resources found

Table 2 (cont.)
PREVIOUS STUDIES WITHIN A ONE-MILE RADIUS

Report Name	Author, year	Report Type	Results
Archaeological Resources Report, Barnett Ranch Open Space Preserve, Ramona, San Diego County, California.	Robbins-Wade 2003	Archaeological Overview and Assessment, Archaeological Evaluation Study, Other	25 resources found (CA-SDI-15,021, CA-SDI-15,022, CA-SDI-15,023, CA-SDI-15,024, CA-SDI-15,025, CA-SDI-15,026, CA-SDI-15,027, CA-SDI-15,028, CA-SDI-15,029, CA-SDI-15,030, CA-SDI-15,031, CA-SDI-15,032, CA-SDI-15,033, CA-SDI-15,034, CA-SDI-15,185, P-37-016633, P-37-016639, P-37-016643, P-37-016646, P-37-016647, P-37-016650, P-37-016651, P-37-016652, P-37-016653, P-37-016655
Archaeological Resources Assessment, CA-SDI-15,052, The Grove, Ramona, San Diego County, California.	Robbins-Wade 2005	Archaeological Overview and Assessment, Archaeological Evaluation Study, Other	2 resources found (CA-SDI-15,052, P-37-17277)
Negative Cultural Resources Survey Report for McCandless TM5564	Shalom-Buell 2009	Archaeological Overview and Assessment, Archaeological Evaluation Study, Other	No resources found
Velocity Paintball Park: An Inventory and Boundary Identification for Prehistoric and Historic Resources	Wade 1999	Archaeological Evaluation Study	3 resources found (P-37-016680, P-37-017277, CA-SDI-15,052)

Table 2 (cont.) PREVIOUS STUDIES WITHIN A ONE-MILE RADIUS			
Report Name	**Author, year**	**Report Type**	**Results**
Cultural Resource Narrative for the Witch Fire CA-MVU-010432 San Diego County, California.	Whatford 2007	Archaeological Overview and Assessment, Archaeological Evaluation Study, Other	Unknown findings
Archaeological Survey of the 16+ Acre Ladera Ranch Project (TPM 20049) Including CA-SDI-13,247, San Diego, California	Whitney Desautels 1993	Archaeological Overview and Assessment, Archaeological Evaluation Study, Archaeological Data Recovery Study, Archaeological Collections and Non-Field Studies	1 resource found (SDI-13,247)
Negative Cultural Resources Survey Report for TPM-20760	Wright 2003	Archaeological Overview and Assessment	No resources found
Negative Cultural Resources Survey Report for TPM 20792	Wright 2004	Archaeological Overview and Assessment	No resources found

Previous Recorded Sites Adjacent to the Study Area

No archaeological sites have been recorded in proximity to the Ramona SEP Project site.

1.3 Applicable Regulations

Resource importance is assigned to districts, sites, buildings, structures, and objects that possess exceptional value or quality illustrating or interpreting the heritage of San Diego County in history, architecture, archaeology, engineering, and culture. A number of criteria are used in demonstrating resource importance. Specifically, criteria outlined in the California Environmental Quality Act (CEQA), the San Diego County Local Register of Historical Resources (Local Register), and the San Diego County Resource Protection Ordinance (RPO) provide the guidance for making such a determination. The following sections detail the criteria that a resource must meet in order to be determined important.

1.3.1 California Environmental Quality Act (CEQA)

According to CEQA (§15064.5a), the term "historical resource" includes the following:

(1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code SS5024.1, Title 14 CCR. Section 4850 et seq.).

(2) A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements of section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

(3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code SS5024.1, Title 14, Section 4852) including the following:

   (A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
   (B) Is associated with the lives of persons important in our past;
   (C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
   (D) Has yielded, or may be likely to yield, information important in prehistory or history.

(4) The fact that a resource is not listed in, or determined eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resource Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code section 5020.1(j) or 5024.1.

According to CEQA (§15064.5b), a project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. CEQA defines a substantial adverse change as:

(1) Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.

(2) The significance of an historical resource is materially impaired when a project:

(A) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or

(B) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

(C) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

Section 15064.5 8 of CEQA applies to effects on archaeological sites and contains the following additional provisions regarding archaeological sites:

(1) When a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource, as defined in subsection (a).

(2) If a lead agency determines that the archaeological site is an historical resource, it shall refer to the provisions of Section 21084.1 of the Public Resources Code, and this section, Section 15126.4 of the Guidelines, and the limits contained in Section 21083.2 of the Public Resources Code do not apply.

(3) If an archaeological site does not meet the criteria defined in subsection (a), but does meet the definition of a unique archaeological resource in Section 21083.2 of the Public Resources Code, the site shall be treated in accordance with the provisions of section 21083.2. The time and cost limitations described in Public Resources Code Section 21083.2 (c-f) do not apply to surveys and site

evaluation activities intended to determine whether the project location contains unique archaeological resources.

(4) If an archaeological resource is neither a unique archaeological nor an historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment. It shall be sufficient that both the resource and the effect on it are noted in the Initial Study or EIR, if one is prepared to address impacts on other resources, but they need not be considered further in the CEQA process.

Section 15064.5 (d) & (e) contain additional provisions regarding human remains. Regarding Native American human remains, paragraph (d) provides:

(D) When an initial study identifies the existence of, or the probable likelihood, of Native American human remains within the project, a lead agency shall work with the appropriate Native Americans as identified by the Native American Heritage Commission as provided in Public Resources Code §5097.98. The applicant may develop an agreement for treating or disposing of, with appropriate dignity, the human remains and any items associated with Native American burials with the appropriate Native Americans as identified by the Native American Heritage Commission. Action implementing such an agreement is exempt from:

(1) The general prohibition on disinterring, disturbing, or removing human remains from any location other than a dedicated cemetery (Health and Safety Code Section 7050.5).

(2) The requirement of CEQA and the Coastal Act.

1.3.2 San Diego County Local Register of Historical Resources (Local Register)

The County requires that resource importance be assessed not only at the State level as required by CEQA, but at the local level as well. If a resource meets any one of the following criteria as outlined in the Local Register, it will be considered an important resource.

(1) Is associated with events that have made a significant contribution to the broad patterns of San Diego County's history and cultural heritage;

(2) Is associated with the lives of persons important to the history of San Diego County or its communities;

(3) Embodies the distinctive characteristics of a type, period, San Diego County region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

(4) Has yielded, or may be likely to yield, information important in prehistory or history.

1.3.3 San Diego County Resource Protection Ordinance (RPO)

The County of San Diego's RPO protects significant cultural resources. The RPO defines "Significant Prehistoric or Historic Sites" as follows:

Sites that provide information regarding important scientific research questions about prehistoric or historic activities that have scientific, religious, or other ethnic value of local, regional, State, or Federal importance. Such locations shall include, but not be limited to:

(1) Any prehistoric or historic district, site, interrelated collection of features or artifacts, building, structure, or object either:
   (aa) Formally determined eligible or listed in the National Register of Historic Places by the keeper of the National Register; or
   (bb) To which the Historic Resource (“H” Designator) Special Area Regulations have been applied; or

(2) One-of-a-kind, locally unique, or regionally unique cultural resources which contain a significant volume and range of data and materials, and

(3) Any location of past or current sacred religious or ceremonial observances which is either:
   (aa) Protected under Public Law 95-341, the American Indian Religious Freedom Act or Public Resources Code Section 5097.9, such as burial(s), pictographs, petroglyphs, solstice observatory sites, sacred shrines, religious ground figures or
   (bb) Other formally designated and recognized sites which are of ritual, ceremonial, or sacred value to any prehistoric or historic ethnic group.

The RPO does not allow non-exempt activities or uses damaging to significant prehistoric or historic lands on properties under County jurisdiction. The only exempt activity is scientific investigation. All discretionary projects are required to be in conformance with applicable County standards related to 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.

2.0 GUIDELINES FOR DETERMINING IMPACT SIGNIFICANCE

For the purposes of this technical report, any of the following will be considered a potentially significant environmental impact to cultural resources:

1. The project causes a substantial adverse change in the significance of a historical resource as defined in §15064.5 of the State CEQA Guidelines. This shall include the destruction, disturbance, or any alteration of characteristics or elements of a resource that cause it to be significant in a manner consistent with the Secretary of Interior Standards.
2. The project causes a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the State CEQA Guidelines. This shall include the destruction or disturbance of an important archaeological site or any portion of an important archaeological site that contains or has the potential to contain information important to history or prehistory.
3. The project disturbs any human remains, including those interred outside of formal cemeteries.
4. The project proposes activities or uses damaging to significant cultural resources as defined by the RPO and fails to preserve those resources.

The significance guidelines listed above have been selected for the following reasons:

Guidelines 1 and 2 are derived directly from CEQA. Sections 21083.2 of CEQA and 15064.5 of the State CEQA Guidelines recommend evaluating historical and archaeological resources to determine whether or not a proposed action would have a significant effect on unique historical or archaeological resources. Guideline 3 is included because human remains must be treated with dignity and respect and CEQA requires consultation with the “Most Likely Descendant” as identified by the Native American Heritage Commission (NAHC) for any project in which human remains have been identified.

Guideline 4 was selected because cultural resources are protected under the RPO. Any project that would have an adverse impact (direct, indirect, and cumulative) on significant cultural resources as defined by this Guideline would be considered a significant impact. The RPO does not allow non-exempt activities or uses damaging to significant prehistoric lands on properties under County jurisdiction. The only exempt activity is scientific investigation.

All discretionary projects are required to be in conformance with applicable County standards related to cultural resources, including the noted RPO criteria on prehistoric and historic sites, as well as requirements listed in the Zoning Ordinance, General Plan, and the Grading, Clearing and Watercourses Ordinance (§87.429). Non-compliance would result in a project that is inconsistent with County standards.

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3.0 ANALYSIS OF PROJECT EFFECTS

3.1 Methods

3.1.1 Survey Methods

The Project area was surveyed for cultural resources on May 2, 2013. The area surveyed consisted of approximately 24 acres and is shown in Figure 4; it does not include the entire 37-acre parcel. The Project site was walked in parallel transects spaced approximately 10 m apart. Although the Project pre-application letter (County of San Diego 2013a) specifies that the entire parcel was to be surveyed for cultural resources, this was later modified such that only the portion of the parcel that would be affected by Project development need be surveyed (County of San Diego 2013b). The field survey covered an area of approximately 24 acres to ensure full survey coverage if the Project footprint changed.

Red Tail Monitoring and Research provided a Native American (Kumeyaay) monitor for the field survey.

3.1.2 Native American Participation/Consultation

Affinis contacted the NAHC in April 2013 for a search of their Sacred Lands Files. Individuals and groups identified by the NAHC were contacted regarding the Project in May 2013 (see Confidential Appendix B). As no responses were received, follow-up phone calls were made in December 2013. Details of responses to the telephone calls are addressed below and included in Confidential Appendix B.

A Native American monitor from Red Tail Monitoring and Research (Kumeyaay) participated in the field survey.

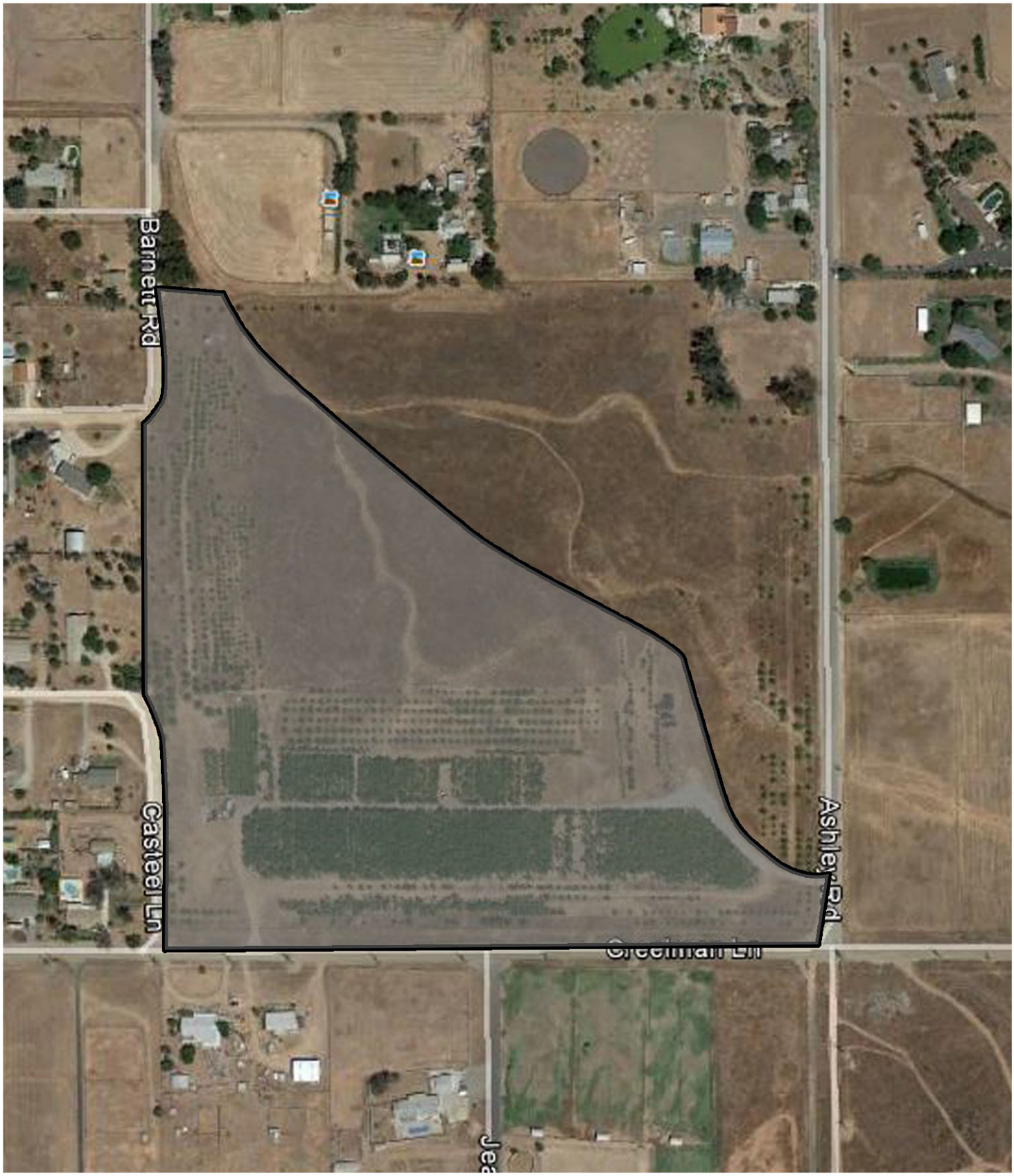
3.2 Results

3.2.1 Archaeological Resources

No cultural resources have been identified within or adjacent to the Project site during the current survey effort. As previously noted, the Project is in the Santa Maria Valley, an area that is generally rich in cultural resources, although only 13 cultural resources have been recorded within one mile of the Project.

3.2.2 Historic Resources

There are no standing structures on the Project site. A review of historic maps and aerial photographs, including County tax factor aerial photographs taken in 1928, showed no buildings or structures within or adjacent to the Project site.



Affinis 810 Jamacha Road Suite 206 El Cajon, CA 92019	Survey Coverage	Figure 4

3.2.3 Native American Participation/Consultation

A Sacred Lands File search by the NAHC conducted in April 2013 indicated that no significant cultural resources or sacred places/sites have been recorded in the immediate vicinity of the Project site (see Confidential Appendix B). Letters regarding the Project were sent to individuals and groups identified by the NAHC in May 2013. No responses were received. Follow-up phone calls were made in December 2013, and for the most part, voicemail messages were left. Responses from the Ewiiaapaayp Tribal Executive Director (Will Micklin) and the Director of Cultural Resources for the Ipay Nation of Santa Ysabel (Clint Linton) both indicated they have no concerns regarding the Project at this time. The Viejas Tribal Historic Preservation Officer (Frank Brown) also responded and indicated the Ramona area is rich in cultural resources and is of importance to the people of Viejas.

As previously noted, a Native American monitor from Red Tail Monitoring and Research participated in the fieldwork conducted for the study.

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4.0 INTERPRETATION OF RESOURCE IMPORTANCE AND IMPACT IDENTIFICATION

4.1 Resource Importance

No cultural resources have been recorded within the Project site. As noted above, however, the Project is located in the Santa Maria Valley, which is generally rich in cultural resources and appears to have been the location of the Late Prehistoric and ethnohistoric rancheria of *Pa'mu* (or Pamo).

4.2 Impact identification

4.2.1 Impact Identification – Archaeological and Native American Resources

No cultural resources have been recorded within the Ramona SEP Project site. Therefore, the Project is expected to have no impacts to cultural resources. However, given the presence of alluvial soils, there is a potential for subsurface cultural resources that are not evident on the surface.

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5.0 MANAGEMENT CONSIDERATIONS – MITIGATION MEASURES AND DESIGN CONSIDERATIONS

No cultural resources have been identified within the Project site. Therefore, the Project is not expected to have any impacts to cultural resources. However, the Project site is located in an area with a great deal of archaeological and cultural sensitivity. In addition, given the alluvial soils in the area, there is a potential for buried cultural resources. Therefore, a monitoring program must be implemented for any grading, trenching, or other-ground-disturbing activity.

Prior to approval of grading or improvement plans, the applicant shall:

Implement a grading monitoring and data recovery program to mitigate potential impacts to undiscovered buried cultural resources on the Project site to the satisfaction of the Director of Planning and Development Services. This program shall include, but shall not be limited to, the following actions:

a. Provide evidence to the Department of Planning and Development Services that a County certified archaeologist has been contracted to implement a grading monitoring and data recovery program to the satisfaction of the Director of Planning and Development Services. A letter from the Principal Investigator shall be submitted to the Director of Planning and Development Services. The letter shall include the following guidelines:

    (1) The project archaeologist shall contract with Native American monitors of the appropriate tribal affiliations to be involved with the grading monitoring program as outlined in the County of San Diego Report Format and Content Guidelines (2007).

    (2) The County certified archaeologist/historian and Native American monitor(s) shall attend the pre-grading meeting with the contractors to explain and coordinate the requirements of the monitoring program as outlined in the County of San Diego Report Format and Content Guidelines (2007).

    (3) The project archaeologist shall monitor all areas identified for development including off-site improvements.

    (4) An adequate number of monitors (archaeological/historical/Native American) shall be present to ensure that all earthmoving activities are observed and shall be on-site during all grading activities <u>for areas to be monitored</u>.

    (5) During the original cutting of previously undisturbed deposits, the archaeological monitor(s) and Native American monitor(s) shall be onsite

as determined by the Project Archaeologist of the excavations and the Native American representative. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist in consultation with the Native American monitor. Monitoring of cutting of previously disturbed deposits will be determined by the Principal Investigator.

(6) Isolates and clearly non-significant deposits will be minimally documented in the field and the monitored grading can proceed.

(7) In the event that previously unidentified potentially significant cultural resources are discovered, the archaeological and Native American monitors shall have the authority to divert or temporarily halt ground disturbance operations in the area of the discovery to allow evaluation of potentially significant cultural resources. The Principal Investigator shall contact the County Archaeologist at the time of the discovery. The Principal Investigator, in consultation with County staff archaeologist and the Native American representative, shall determine the significance of the discovered 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.

(8) If any human remains are discovered, the Principal Investigator shall contact the County staff archaeologist and the County Coroner. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant, as identified by the NAHC, shall be contacted by the Principal Investigator in order to determine proper treatment and disposition of the remains.

(9) Before construction activities are allowed to resume in the affected area, the artifacts shall be recovered and features recorded using professional archaeological methods. The Principal Investigator shall determine the amount of material to be recovered for an adequate artifact sample for analysis.

(10) In the event that previously unidentified cultural resources are discovered, all cultural material collected during the grading monitoring program shall be processed and curated at a San Diego facility that meets federal standards per 36 CFR Part 79, and therefore would be professionally curated and made available to other archaeologists/researchers for further study. 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. Evidence shall be in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid.

(11) Monthly status reports shall be submitted to the Director of Planning and Development Services starting from the date of the notice to proceed to termination of implementation of the grading monitoring program. The reports shall briefly summarize all activities during the period and the status of progress on overall plan implementation. Upon completion of the implementation phase, a final report shall be submitted describing the plan compliance procedures and site conditions before and after construction.

(12) In the event that previously unidentified cultural resources are discovered, a report documenting the field and analysis results and interpreting the artifacts and research data within the research context shall be completed and submitted to the satisfaction of the Director of Planning and Development Services prior to the issuance of any building permits. The report will include Department of Parks and Recreation Primary and Archaeological Site forms.

(13) In the event that no cultural resources are discovered, a brief letter to that effect shall be sent to the Director of Planning and Development Services by the consulting archaeologist that the grading monitoring activities have been completed.

b. Provide evidence to the Director of Public Works (DPW) that the following notes have been placed on the Grading Plan:

(1) The County certified archaeologist and Native American monitor shall attend the pre-construction meeting with the contractors to explain and coordinate the requirements of the monitoring program.

(2) The project archaeologist and Native American monitor shall monitor all areas identified for development including off-site improvements.

(3) During the original cutting of previously undisturbed deposits, the archaeological monitor(s) and Native American monitor(s) shall be onsite as determined by the Principal Investigator of the excavations. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist in consultation with the Native American monitor.

Monitoring of cutting of previously disturbed deposits will be determined by the Principal Investigator.

(4) In the event that previously unidentified potentially significant cultural resources are discovered, the archaeological and Native American monitors shall have the authority to divert or temporarily halt ground disturbance operations in the area of the discovery to allow evaluation of potentially significant cultural resources. The Principal Investigator shall contact the County Archaeologist at the time of the discovery. The Principal Investigator, in consultation with County staff archaeologist and Native American representative, shall determine the significance of the discovered 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 Principal Investigator and approved by the County Archaeologist, then carried out using professional archaeological methods.

(5) The archaeological monitor(s) and Native American monitor shall monitor all areas identified for development.

(6) If any human remains are discovered, the Principal Investigator shall contact the County Coroner. 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 by the Principal Investigator order to determine proper treatment and disposition of the remains.

(7) The Principal Investigator shall submit monthly status reports to the Director of Planning and Development Services starting from the date of the notice to proceed to termination of implementation of the grading monitoring program. The reports shall briefly summarize all activities during the period and the status of progress on overall plan implementation. Upon completion of the implementation phase, a final report shall be submitted describing the plan compliance procedures and site conditions before and after construction.

(8) Prior to rough grading inspection sign-off, provide evidence that the field grading monitoring activities have been completed to the satisfaction of the Director of Planning and Development Services. Evidence shall be in the form of a letter from the Project Investigator.

(9) Prior to Final Grading Release, submit to the satisfaction of the Director of Planning and Development Services, a final report that documents the

results, analysis, and conclusions of all phases of the Archaeological Monitoring Program. The report shall also include the following:

- Department of Parks and Recreation Primary and Archaeological Site forms.

- Evidence that all cultural material collected during the grading monitoring program has been curated at a San Diego facility that meets federal standards per 36 CFR Part 79, and therefore would be professionally curated and made available to other archaeologists/ researchers for further study. 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. Evidence shall be in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid.

  Or

  In the event that no cultural resources are discovered, a brief letter to that effect shall be sent to the Director of Planning and Development Services by the Principal Investigator that the grading monitoring activities have been completed.

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8.0 LIST OF MITIGATION MEASURES AND DESIGN CONSIDERATIONS

As addressed in Section 5.0, the Project is not expected to have any impacts to cultural resources; however, the general area of the Project is sensitive in terms of cultural resources and there is a potential for subsurface cultural material. Based on this, the following mitigation measure will serve to mitigate Project impacts to below a level of significance.

Table 3
MITIGATION MEASURES AND DESIGN CONSIDERATIONS

Potential Impact	Mitigation Measure
General mitigation measure	Construction monitoring, curation of any cultural material collected during monitoring

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