
2.3 Cultural Resources and Tribal Cultural Resources

The assessment of the Project's potential to have an adverse effect on cultural and tribal cultural resources is based on technical studies prepared for the Project. The results of the analyses are presented below and are included as appendices to this DSEIR with confidential records and maps on file at the County of San Diego, Planning & Development Services and deposited with the South Coastal Information Center (SCIC).

- Appendix F: *Santa Fe Valley Chinese Church Project (Smith, 2010)* and *Changes to Project Description (Smith, 2016)*
- Appendix G: *Historic Resources Technical Report for the 16919 Four Gee Road Property (Moomjian, 2012)* and *MUP 10-037/Changes to Project Description (Moomjian, 2016)*

The Santa Fe Valley Specific Plan (SFVSP) EIR (SP95-001) was also reviewed. The SFVSP EIR identified that significant impacts to cultural resources would occur as a result of Project implementation. However, no resources were identified within the Project area of the Chinese Bible Church. The on-site structures at the time of the preparation of the SFVSP EIR had a construction date of less than 50 years, and as such were not considered historic at that time.

Comments received in response to the Notice of Preparation (NOP) include concerns regarding the historical significance of the existing onsite structures and the protection of open area of trees that are 50+ years old. These concerns are addressed in the attached reports and summarized in this section. A copy of the NOP and comment letters received in response to the NOP are included in Appendix A.

2.3.1 Background

Cultural resources were addressed in the previously certified Santa Fe Valley Specific Plan EIR (1995). Significant impacts to cultural resources were identified due to the presence of 30 archaeological sites located within the larger Santa Fe Valley Specific Plan area. The Project site had been previously surveyed as part the Santa Fe Valley Specific Plan EIR (Ogden 1995) and no cultural resources were identified within the Project site.

2.3.2 Existing Conditions

2.3.2.1 *Environmental Setting*

Natural Environment

The Project area is within the central valley subregion that supports a range of habitats and biological communities. Habitats on the Project site include emergent wetland, non-native grassland, row crops and developed habitat.

Topography on the Project site varies from flat to gently sloping with a low hill in the west. Currently the hill is occupied by two single-family residences and two garages with interspersed landscaping.

A small north-south drainage is present within the eastern portion of the site. Elevations range between approximately 516 feet AMSL and 485 feet AMSL (Figure S.2). A large unnamed east-west marshy drainage runs along the northern edge of the Project site and eventually connects to the San Dieguito River approximately 1.7 miles to the north-northwest.

Cultural Environment

This section summarizes the existing cultural resources within the Project footprint. Cultural resources are the tangible or intangible remains or traces left by prehistoric or historical peoples who inhabited the San Diego region. Cultural resources can also include traditional cultural places, such as gathering areas, landmarks, and ethnographic locations (County of San Diego 2007a).

No archaeological or tribal cultural resources have been identified within the Project footprint; however, two potentially historic resources were identified on site. Archaeological sites and historic resources are located near the Project site and include temporary camps, housing and ancillary structures, and trash pits.

2.3.2.2 Methodology

The presence and significance of existing cultural resources associated with the Project was determined using the methodologies outlined below.

- Archaeological site record and archival research was conducted at the SCIC for the Project area and immediate vicinity (one mile radius). The site record and archival research consisted of reviews of archaeological site records and previous cultural studies.
- Various maps, including Project maps, United States Geological Survey (USGS) quadrangle maps, historic maps and prior reports were reviewed to identify cultural resources that had been previously recorded in the vicinity of the Project area.
- An intensive pedestrian field survey was conducted for the entire Project footprint which included transect spacing that ranged from one to three meters apart. Native American monitors were present during the survey.
- A request for a Sacred Lands File search was sent to the Native American Heritage Commission (NAHC) for their consideration and input.
- Historic evaluation of the onsite structures was conducted which included historical research, a site inspection and structures assessment, and oral interviews.

Records Search Results

An archaeological records search was conducted for the property by Brian F. Smith & Associates (BFSA) at the SCIC. Thirty-three cultural resource studies have been conducted within a one-mile radius of the Project site and 99 cultural resources have

been documented. No previously recorded cultural resources were identified within the Project site.

The majority of the recorded resources are prehistoric archaeological sites. Four sites are within close proximity to the Project. The closest recorded resource (SDI-12747) is a prehistoric artifact scatter located in an exposed cobble deposit. Artifacts observed during recordation consisted of debitage, cores, scrapers, hammerstones, a mano, and a metate fragment. The balance of additional sites near the Project include two (SDI-13010, SDI-13313) temporary camps and the third site (SDI-10493) includes prehistoric and historic components. The prehistoric features associated with SDI-10493 consist of seven bedrock milling features. Additionally, manos, cores, hammerstones, flakes, fire-affected rocks, and ceramics were also observed. Historic features associated with the site are described as concrete foundations and a wooden tank. Additionally a wide variety of colored glass including purple, clear pane, and aqua; metal, and burned wooden planks were also recorded. CA-SDI-13010 was recorded by Ogden Environmental in 1992, and subsequently destroyed by development. CA-SDI-13313 was tested by BFSA in 1995, and subsequently destroyed by development. The southern half of SDI-10493 is still in existence, but the northern half has been destroyed by development.

Archival Research

Extensive historic research was conducted by Scott A. Moomjian at various information repositories throughout San Diego County. Original architectural plans for the property were identified at the San Diego History Center (SDHC). The Residential Building Record was also obtained from the Assessor's Office.

An oral interview was conducted with Mr. Richard Cromwell III, who presently serves as the Trustee for the Golem Family Trust. Mr. Cromwell provided historic photographs of the Project site, which are included as an appendix of the Historic Resources Report (Appendix G). In addition, an oral interview was conducted with Mr. Roberto Reyes, the caretaker for the property for 38 years. Mr. Reyes also accompanied the historian to the site for observation of the exterior and interior of the two single-family residences and garages on the property.

General and specific information related to the architect and architecture of the buildings was developed through internet research and from the conducted research. Additionally a chain of title report, including grant deeds and a Notice of Completion, was prepared by California Lot Book, Inc.

Field Survey Results

Archaeological Survey

BFSA conducted an intensive pedestrian survey of the Project site on November 11, 2010. Transects spaced approximately one to three meters apart were employed in a north-to-south orientation across the Project site. The majority of the Project site is flat and covered with agricultural fields that obscure the ground surface. Areas lacking vegetation cover primarily along the eastern portion of the property were intensely surveyed to determine the presence of surface deposits and potential for subsurface

materials. Limitations of the archaeological survey included vegetation from agricultural use. No artifacts or features were identified during the archaeological field survey.

Mr. Clint Linton from Red Tail Monitoring and Research, Inc. (Kumeyaay) provided the Native American monitor during the survey of the Project which included Larry Sutton. No concerns were raised by the Mr. Sutton during the survey.

Historic Resources Survey

An extensive analysis of the Project was conducted by Scott A. Moomjian on August 12, 2010. Mr. Moomjian was accompanied on this site visit by Mr. Reyes who, as noted above, has worked as a caretaker for the property for 38 years. With the assistance of historic photographs of the property, the residential building record, and the direction of Mr. Reyes, Mr. Moomjian evaluated the exterior and interior condition and integrity of the two single-family residences and garages on the Project site.

Native American Consultation

A Sacred Lands file search was submitted to the Native American Heritage Commission (NAHC) on November 9, 2010 (and again on January 6, 2014) requesting identification of sacred sites or traditional use areas and a list of local Native American Tribes, bands, or individuals who may have information about the Project. Based upon the response from the NAHC, no known sacred sites were identified within the Project study area.

The Project includes a Specific Plan Amendment to the Santa Fe Valley Specific Plan, which triggers the requirement for Native American Consultation under Senate Bill (SB) 18. County Planning Staff initiated SB-18 Consultation and letters were sent to listed Tribes and organizations on January 22, 2014. No responses were received by the County.

2.3.2.3 *Applicable Plans and Policies*

State Regulations

California Register of Historical Resources

California Public Resources Code Section 5024.1 (a) establishes the California Register of Historical Resources (CRHR). Section 5024.1 (c-f) provides criteria for CRHR eligibility listing. The CRHR considers a resource as "historically significant" and qualifying as a historical resource if it:

- Is associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States
- Is associated with the lives of persons important to local, California, or national history
- Embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of a master or possesses high artistic values
- Has yielded, or has the potential to yield, information important to prehistory or history of the local area, California, or the nation.

These criteria do not preclude a lead agency from determining that a resource may be a historical resource as defined in Public Resources Code Sections 5020.1(j) and 5024.1.

California Environmental Quality Act (CEQA)

CEQA requires lead agencies to carefully consider the potential effects of a project on historical and unique archaeological resources. A “historical resource” includes, but is not limited to, any object, building, structure, site, area, place, record, or manuscript, which is historically or archaeologically significant (California Public Resources Code, Section 5020.1 (j)).

Section 15064.5 of the CEQA Guidelines specifies criteria for determining the significance of impacts to archaeological and historical resources. Section 15064.5 defines a “historical resource” as:

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 5024.1, 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 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 (14 CCR 4852) including the following:
 - a. Is associated with events that have made a contribution to the broad patterns of California 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 construction, or represents the work of an important individual or possesses high artistic values; or
 - d. Has yielded, or may be likely to yield, important information in prehistory or history.
4. The fact that a resource is not listed in, or determined to be 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 Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code Sections 5020.1(j) or 5024.1

If a cultural resource does not meet the definition of an “historic resource “under CEQA Guidelines Section 15164.5, it must be reviewed under CEQA Statutes Section 21083.2(g) that defines the significance of an archaeological site in terms of uniqueness. A unique archaeological resource means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets one of the following criteria:

1. Contains information needed to answer important scientific questions and there is a demonstrable public interest in that information.
2. Has a special and particular quality, such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

A non-unique archaeological resource indicates an archaeological artifact, object, or site that does not meet the previously listed criteria. Impacts to non-unique archaeological resources receive no further consideration under CEQA, other than the recording of its existence by the lead agency if it so elects.

Human remains require special handling and must be treated with dignity. Procedures are provided in Section 15064.5(e) of the CEQA Guidelines, Section 5097.98 of the Public Resources Code and Section 87.429 of the County’s Grading Ordinance. In the event of the discovery of human remains and/or funerary items, the following procedures, as outlined by the above statutes, regulations, and ordinances, shall be followed:

1. There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until:
 - a. The County Coroner must be contacted to determine that no investigation of the cause of death is required, and
 - b. If the Coroner determines that the remains are Native American:
 - i. The Coroner shall contact the NAHC within 24 hours.
 - ii. The NAHC shall identify the person or persons it believes to be the most likely descended (MLD) from the deceased Native American.
 - iii. The MLD may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code, Section 5097.98, or

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2. Where the following conditions occur, the landowner or his authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further subsurface disturbance.
 - a. The NAHC is unable to identify an MLD or the MLD failed to make a recommendation within 24 hours after being notified by the commission;
 - b. The descendent identified fails to make a recommendation; or
 - c. The landowner or his authorized representative rejects the recommendation of the descendent, and the mediation by the NAHC fails to provide measures acceptable to the landowner.

Similarly, Public Resources Code Section 5097.98 states that whenever the NAHC receives notification of Native American human remains from a County Coroner, the NAHC shall immediately notify the MLD. The MLD may, with permission from the owner of the land in which the human remains were found, inspect the site and recommend to the owner or the responsible party conducting the excavation work a means for treating and/or disposing of the human remains and any associated grave goods. The MLD is required to complete their site inspection and make their recommendation within 48 hours of their notification from the NAHC.

California Health and Safety Code

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. Health and Safety Code, Section 7050.5, requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the County Coroner has examined the remains (Section 7050.5b). If the Coroner determines or has reason to believe the remains are those of a Native American, the Coroner must contact the NAHC within 24 hours (Section 7050.5c).

Local Regulations

County of San Diego Local Register of Historical Resources

The criteria for listing historical resources to the Local Register (Ordinance No. 9493) are consistent with those developed by the Office of Historic Preservation (OHP) for listing resources to the California Register of Historical Resources (California Register), but have been modified for local use in order to include a range of historical resources which specifically reflect the history and prehistory of San Diego County. Only resources that meet the criteria set out below may be listed or formally determined eligible for listing to the Local Register.

1. The resource is associated with events that have made a significant contribution to the broad patterns of San Diego County's history and cultural heritage;
2. The resource is associated with the lives of persons important to the history of San Diego County or its communities;

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3. The resource 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. The resource has yielded or may be likely to yield information important in prehistory or history.

County of San Diego General Plan — Conservation and Open Space Element

The following goals and policies identified in the County of San Diego General Plan (August 2011) Conservation and Open Space Element are applicable to the Project:

1. **Goal COS-7: Protection and Preservation of Archaeological Resources.** Protection and preservation of the County's important archaeological resources for their cultural importance to local communities, as well as their research and educational potential.
 - a. **Policy COS-7.1: Archaeological Protection.** Preserve important archaeological resources from loss or destruction and require development to include appropriate mitigation to protect the quality and integrity of these resources.
 - b. **Policy COS-7.2: Open Space Easements.** Require development to avoid archaeological resources whenever possible. If complete avoidance is not possible, require development to fully mitigate impacts to archaeological resources.
 - c. **Policy COS-7.3: Archaeological Collections.** Require the appropriate treatment and preservation of archaeological collections in a culturally appropriate manner.
 - d. **Policy COS-7.4: Consultation with Affected Communities.** Require consultation with affected communities, including local tribes to determine the appropriate treatment of cultural resources.
 - e. **Policy COS-7.5: Treatment of Human Remains.** Require human remains be treated with the utmost dignity and respect and that the disposition and handling of human remains will be done in consultation with the Most Likely Descendant (MLD) and under the requirements of Federal, State, and County Regulations.
 - f. **Policy COS-7.6: Cultural Resource Data Management.** Coordinate with public agencies, tribes, and institutions in order to build and maintain a central database that includes a notation whether collections from each site are being curated, and if so, where, along with the nature and location of cultural resources throughout the County of San Diego.
2. **Goal COS-8: Protection and Conservation of the Historical Built Environment.** Protection, conservation, use, and enjoyment of the County's important historic resources.

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- a. **Policy COS-8.1: Preservation and Adaptive Reuse.** Encourage the preservation and/or adaptive reuse of historic sites, structures, and landscapes as a means of protecting important historic resources as part of the discretionary application process, and encourage the preservation of historic structures identified during the ministerial application process.
 - b. **Policy COS-8.2: Education and Interpretation.** Encourage and promote the development of educational and interpretive programs that focus on the rich multicultural heritage of the County of San Diego.

Santa Fe Valley Specific Plan

The SFVSP identifies the following objective and policies related to cultural sites (archaeological and historical):

1. **Objective CO-5:** Protect and conserve significant cultural resource sites (archeological and historical) in the SPA.
 - a. **Policy CO-5.1:** Sites identified as Significant-Mitigable through Avoidance/Preservation in the Cultural Resources Technical Report shall be placed in the Open Space I land use designation. These are sites SDI-532/4935A; SDi-4935B; SDi-316; SDi-149; SDi-12,684; and SDi-12,685H.
 - b. **Policy CO-5.2:** Prior to or concurrently with approval of Final or Parcel Maps, issuance of grading permits or improvements plans in lieu of grading permits and prior to issuance of any other discretionary permits within the subject property, sites identified in Policy CO-5.1 shall be dedicated in permanent open space easements. The language of the easements shall describe permitted activities, if any, within the easement.
 - c. **Policy CO-5.3:** Prior to conditional approval of discretionary permits, areas that have not been surveyed for cultural resources that are located in development areas must be surveyed by a qualified archaeologist.
 - d. **Policy CO-5.4:** All untested or unevaluated cultural resource sites are considered as important resources until testing proves otherwise.

County of San Diego Resource Protection Ordinance (RPO)

The RPO requires that cultural resources be evaluated as part of the County's discretionary environmental review process for certain permit types. If cultural resources are found to be significant pursuant to the RPO, they must be preserved. The RPO prohibits development, trenching, grading, clearing, and grubbing, or any other activity or use that damages significant prehistoric or historic sites.

Pursuant to the Resource Protection Ordinance (RPO), significant prehistoric or historic sites are resources defined as those 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 national importance. Such locations shall include, but not be limited to:

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1. Any prehistoric or historic district, site, interrelated collection of features or artifacts, building, structure, or object either:
 - a. Formally determined eligible or listed in the National Register of Historic Places by the Keeper of the National Register; or
 - b. 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:
 - a. Protected under Public Law 95-341, the American Indian Religious Freedom Act or Public Resources Code §5097.9, such as burial(s), pictographs, petroglyphs, solstice observatory sites, sacred shrines, or religious ground figures; or
 - b. Other formally designated and recognized sites which are of ritual, ceremonial, or sacred value to any prehistoric or historic ethnic group.

County of San Diego Grading Ordinance

The Grading Ordinance requires that projects involving grading, clearing, and/or removal of natural vegetation obtain a grading permit, unless the project meets one or more of the exemptions listed in Section 87.202 of the Grading Ordinance. The grading permit is discretionary and requires compliance with CEQA. In the event that human remains or Native American artifacts are encountered, Section 87.429 requires that grading operations be suspended in the affected area and the operator is required to inform the County Official. The County’s Grading Ordinance requires the Project to comply with the requirements of Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.99.

Traditional Cultural Properties/Tribal Cultural Resources

Native American Heritage Values

Federal and state laws mandate that consideration be given to the concerns of contemporary Native Americans with regard to potentially ancestral human remains, associated funerary objects, and items of cultural patrimony. Consequently, an important element in assessing the significance of the study site has been to evaluate the likelihood that these classes of items are present in areas that would be affected by the Project.

Potentially relevant to prehistoric archaeological sites is the category termed Traditional Cultural Properties (TCP) in discussions of cultural resource management (CRM) performed under federal auspices. According to Patricia L. Parker and Thomas F. King (1998), “Traditional” in this context refers to those beliefs, customs, and practices of a living community of people that have been passed down through the generations, usually orally or through practice. The traditional cultural significance of a historic

property, then, is significance derived from the role the property plays in a community's historically rooted beliefs, customs, and practices.

The County of San Diego Guidelines identifies that cultural resources can also include TCPs, such as gathering areas, landmarks, and ethnographic locations in addition to archaeological districts (2007). These guidelines incorporate both State and Federal definitions of TCPs. Generally, a TCP may consist of a single site, or group of associated archaeological sites (district; traditional cultural landscape), or an area of cultural/ethnographic importance.

The Traditional Tribal Cultural Places Bill of 2004 requires local governments to consult with Native American representatives during the Project planning process. The intent of this legislation is to encourage consultation and assist in the preservation of "Native American places of prehistoric, archaeological, cultural, spiritual, and ceremonial importance" (County of San Diego 2007). It further allows for tribal cultural places to be included in open space planning. State Assembly Bill 52, in effect as of July 1, 2015, introduces the Tribal Cultural Resource (TCR) as a class of cultural resource and additional considerations relating to Native American consultation into CEQA. As a general concept, a TCR is similar to the federally-defined TCP, however incorporates consideration of local and state significance and required mitigation under CEQA. A TCR may be considered significant if included in a local or state register of historical resources; or determined by the lead agency to be significant pursuant to criteria set forth in PRC Section 5024.1; or is a geographically defined cultural landscape that meets one or more of these criteria; or is a historical resource described in PRC §21084.1, a unique archaeological resources described in PRC Section 21083.2, or is a non-unique archaeological resource if it conforms with the above criteria.

In 1990 the NPS and Advisory Council for Historic Preservation introduced the term 'TCP' through National Register Bulletin 38 (Parker and King 1990). A TCP may be considered eligible based on "its association with cultural practices or beliefs of a living community that (a) are rooted in that community's history, and (b) are important in maintaining the continuing cultural identity of the community" (Parker and King 1990:1). Strictly speaking, Traditional Cultural Properties are both tangible and intangible; they are anchored in space by cultural values related to community-based physically defined "property referents" (Parker and King 1990:3). On the other hand, TCPs are largely ideological, a characteristic that may present substantial problems in the process of delineating specific boundaries. Such a property's extent is based on community conceptions of how the surrounding physical landscape interacts with existing cultural values. By its nature, a TCP need only be important to community members, and not the general outside population as a whole. In this way, a TCP boundary, as described by Bulletin 38, may be defined based on viewscape, encompassing topographic features, extent of archaeological district or use area, or a community's sense of its own geographic limits. Regardless of why a TCP is of importance to a group of people, outsider acceptance or rejection of this understanding is made inherently irrelevant by the relativistic nature of this concept.

2.3.3 Analysis of Project Effects and Determination as to Significance

The following discussion evaluates potential impacts to prehistoric and historic sites, as well as the potential disturbance of human remains resulting from the Project. In addition, tribal cultural resources are also evaluated and discussed. According to CEQA Guidelines Section 15126.4(b)(3), “public agencies should, whenever feasible, seek to avoid damaging effects on any historical resource of an archaeological nature and require the consideration of preservation in place as the preferred manner of mitigation and data recovery, only if preservation is not feasible.”

An analysis of each cultural site is provided below along with a determination as to the significance of the site, pursuant to Section 15064.5 of the CEQA Guidelines and the County RPO.

2.3.3.1 *Archaeological Sites*

Guidelines for the Determination of Significance

For the purposes of this DSEIR, any of the following will be considered a significant impact to prehistoric resources:

- The Project, as designed, causes a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5 of the State CEQA Guidelines. This shall include the destruction or disturbance of an important archaeological site that contains or has the potential to contain information important to history or prehistory.
- The Project, as designed, disturbs any human remains, including those interred outside of formal cemeteries.
- Activities or uses damaging to significant cultural resources as defined by the County RPO are proposed and the Project fails to preserve those resources.

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

The first guideline is derived directly from CEQA. Section 21083.2 of the Public Resources Code and Section 15064.5 of the CEQA Guidelines recommend evaluating archaeological resources to determine whether or not a proposed action would have a significant effect on unique archaeological resources. The second guideline 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 NAHC for any project in which human remains have been identified. The third guideline was selected because cultural resources are protected under the RPO. Any project that would have an adverse impact (direct, indirect, and/or cumulative) on significant prehistoric resource as defined by these guidelines would be considered to have a significant impact on the environment.

The County RPO does not allow non-exempt activities or uses that could damage prehistoric resources on properties under County jurisdiction. The only exempt activity is scientific investigation. The Project is required to be in conformance with applicable County standards related to cultural resources, including the noted RPO criteria for

prehistoric sites. Non-compliance would result in a project that is inconsistent with County standards and a significant impact would be identified.

Analysis

Although no archaeological resources were identified during the records search, literature review or Phase I cultural resource survey, the obscured ground surface encountered during the survey and the high frequency of archaeological resources surrounding the Project site indicate a potential for unidentified cultural resources to be present on the Project site. There is the potential that brushing and initial grading activities associated with construction of the Project could result in the discovery of previously unrecorded, potentially significant archaeological resources. This represents a **potentially significant impact (Impact CR-1)**. Mitigation is required.

No known archaeological resources are present and the Project site is not known to be the location of past or current sacred religious or ceremonial observances. Therefore, no impact is identified under the RPO.

No evidence of human remains, including those interred outside of formal cemeteries, was discovered during the records search, literature review or site surveys for the Project. There is no indication that the Project site was used by Native Americans for religious, ritual, or other special activities and therefore impacts to Native American burial sites are not expected.

2.3.3.2 Historic Sites

Guideline for the Determination of Significance

For the purposes of this DSEIR, any of the following will be considered a significant impact to cultural resources:

- The project, as designed, causes a substantial adverse change in the significance of an historic resource as defined in Section 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 not consistent with the Secretary of Interior Standards.
- Activities or uses damaging to significant cultural resources as defined by the County RPO are proposed and the Project fails to preserve those resources.

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

Guideline one is derived directly from CEQA. Sections 21083.2 of the Public Resources Code and 15064.5 of the CEQA Guidelines recommend evaluating historical resources to determine whether or not a proposed action would have a significant effect on unique historical resources. Guideline two was selected because historic resources are protected under the RPO. Any project that would have an adverse impact (direct, indirect, and/or cumulative) on significant historic resources as defined by these guidelines would be considered to have a significant impact.

The County RPO does not allow non-exempt activities or uses that could damage significant historic resources on properties under County jurisdiction. The only exempt activity is scientific investigation. The Project is required to be in conformance with applicable County standards related to cultural resources, including the noted RPO criteria for historic sites. Non-compliance would result in a project that is inconsistent with County standards.

Analysis

As a result of the historic resources survey, two historic resources were documented and evaluated for significance according to CEQA (Section 15064.5) and the RPO criteria. These resources include a bunk house and a ranch house (P-37-032395). Each resource is summarized below along with a determination of significance. A detailed discussion of each resource can be found in the historic resources study (Appendix G).

Two (P-37-032395) historic resources within the Project area were evaluated for significance according to CEQA (Section 15064.5) and RPO criteria. The evaluation included archival research, oral histories, historic and architectural analysis. According to the evaluation, these resources are not significant according to CEQA and the RPO criteria because they (1) are not associated with events that have made a significant contribution to the broad patterns of California or San Diego County's history and cultural heritage, (2) are not associated with the lives of persons important to our past, including the history of San Diego County or its communities, (3) do not embody the distinctive characteristics of a type, period, region (San Diego County), or method of construction, or represents the work of an important creative individual, or possesses high artistic values, and (4) lack the potential to further answer questions related to understanding the history of the area. Since these resources are evaluated as not significant, any impacts incurred through the implementation of the Project will be less than significant.

Bunk House

The Bunk House served as a home for the long-time caretaker of the property. The structure is believed to have been originally built as "war-time housing" at another location in approximately 1948, and moved to its present location in 1952. The building is a one-story, Modern Contemporary modified single-family residence. It was originally rectangular in shape, but is today irregular in shape due to the modifications and alterations that have occurred over time. The residence features a living room, bedroom, kitchen, and bathroom. A small carport/storage shed is located west of the Bunk House.

The Bunk House features two additions. It is unknown when these improvements were made but they appear to have been constructed in two phases. The first addition is located along the east elevation of the original building, along a north-south axis. The second addition is located at the northwest corner of the original building. Overall, the building as a whole is in fair condition.

Ranch House

The Ranch House is located in the center of the Project site and was formerly occupied by Howard and Arleen Golem. Designed and built in 1955, the building is a one-story, Modern Contemporary single-family residence. Along the west elevation is a detached, square-shaped garage. The roof is flat with tongue and groove ceiling. The exterior consists of board and batten siding.

The Ranch House features an irregularly shaped rectangular floor plan. The residence features an entrance hall, living room, dining room, den, four bedrooms, service pantry, kitchen, and three bathrooms. The original architectural plans indicate that when the house was designed, it was to feature three bedrooms; however, a fourth bedroom was created by the enclosure of the porch area along the northeast elevation.

The Ranch House features a moderately-pitched, front- and side-gabled roof with wide eave overhang, exposed roof rafters, and tar and gravel roofing material. The original roof was removed and replaced approximately 20 years ago. Some original windows in the home have been replaced with vinyl and a stained glass window was added approximately 10 years ago to replace an original window on the rear (north) elevation.

The main entry to the Ranch House is along the main (south) elevation. The original architectural plans and historic photographs indicate that when designed and built, the home was open with brick set in a "sand walk". A projecting, flat corrugated metal roof, supported by square columns, was erected in front of the main entry to create a porch structure, and the brick was removed and replaced with tile. Underneath the porch structure, there is a wood paneled front door. Also along the southeast elevation is another wood paneled side door. Both of these doors are not original having been replaced approximately 20 years ago.

When originally designed and constructed, the Ranch House featured a recessed porch underneath the roof overhang which extended along the entire northeastern elevation. The porch area was enclosed approximately 12-15 years ago. Today, the former porch area is framed with non-original vertical paneled plywood with vinyl sliding windows, and a wood paneled door along its west side. Although a small porch area still exists, original windows in this area have been replaced with a vinyl and metal sliding glass door. The residence is in good condition.

The Project includes the removal of all of the structures from the Project site. An Historic Resources Analysis was undertaken to evaluate the potential historical and architectural significance of the Bunk House and Ranch House.

A number of criteria are used in identifying significant historic resources and are based upon criteria for inclusion in the San Diego County Local Register of Historical Resources, California Register of Historical Resources, CEQA, and the RPO. As described above, significance 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 or culture. In addition, the integrity of the structure must be assessed.

The San Diego County Local Register was modeled after the California Register. As such, a cultural resource is determined significant if the resource is listed in, or

determined to be eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, or the San Diego County Local Register. Any resource that is significant at the National or State level is by definition significant at the local level. However, the fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources; or is not included in a local register of historical resources; or is not identified in an historical resources survey does not preclude a lead agency from determining that a resource may be historical as defined in Public Resources Code Section 5020.1(j) or Section 5024.1.

California and Local Register Criteria

When evaluated within its historic context, a property must be shown to be significant for one or more of the four California or Local Register Criteria for Evaluation. The Criteria describes how properties are significant for their association with important events or persons, for their importance in design or construction, or for their information potential. In addition, a property must not only be shown to be significant under the California or Local Register criteria, but it also must have integrity.

Criterion A – Event: Neither the Bunk House nor the Ranch House qualifies for listing under Criterion A at either the local or state levels. Historical research failed to identify any important events associated with the buildings over the course of their existence that have made a significant contribution to the broad patterns of San Diego County’s history and/or cultural heritage.

Criterion B – Person: Neither the Bunk House nor the Ranch House qualifies for listing under Criterion B at the local or state levels. Historical research failed to identify any important owners, tenants, and/or occupants associated with the buildings over the course of their existence to justify historical significance or importance to the history of San Diego County or its communities. No owners, tenants, or occupants affected the course of local, state, or national history. In particular, none of Howard G. Golem’s contributions or achievements has been determined to be historically significant.

Criterion C –Design/Construction:

1. Embodying the Distinctive Characteristics of a Type, Period, or Method of Construction

Neither the Bunk House nor the Ranch House qualifies for listing under Criterion C on the basis of their architecture at either the local, state, or national levels. In their current conditions, neither the Bunk House nor the Ranch House is considered a representative example of the Modern Contemporary architectural style, which occurred from approximately 1940-1980.

2. Representing the Work of a Master (National Register) and/or Important, Creative Individual (California Register)

The Bunk House does not qualify for listing under Criterion C at either the local, state, or national levels on the basis of its architect/builder. Historical research could not ascertain the identity of the architect and/or builder responsible for the design/construction of the building. The building does not, therefore, represent the work of a master and/or an important, creative individual. Further, the building does not exhibit style or quality and, as a result, does not represent the

work of an anonymous craftsman whose work is distinguishable from others by its characteristic style and quality.

The Ranch House was designed by Sim Bruce Richards in a Modern Contemporary architectural style in 1955. The home was built by James C. Fowler & Son that same year. Neither this firm, nor its principals have ever been regarded as master builders and/or important, creative individuals.

Sim Bruce Richards is regarded by the City of San Diego as a master architect. He is not, however, listed by the County of San Diego as a master architect. Nevertheless, historical research indicates that over the course of his career, Richards designed over 300 buildings and many of his works are still in existence today in the Point Loma and La Jolla communities. Historical research has identified several examples of Richards' work which have been considered architecturally significant. However, the Ranch House has not been identified, documented, or regarded as a noteworthy example of Richards' work.

3. Possessing High Artistic Values

Neither the Bunk House nor the Ranch House qualifies for listing under Criterion C as a structure that possesses high artistic values. The buildings do not articulate a particular concept of design to the extent that an aesthetic ideal is expressed.

Criterion D – Information Potential: Neither the Bunk House nor the Ranch House qualify for listing under Criterion D: Information Potential as the property has not, and is not likely to, yield information important in terms of history or prehistory.

Integrity: In addition to determining the significance of a property under local or state criteria, a property must also must possess integrity. Resources must retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. The local and state registers recognize seven aspects of integrity and neither the Bunk House nor the Ranch House meets all seven criteria (location, design, setting, materials and workmanship, feeling, and association). See Appendix G for the detailed analysis.

Mature Trees

During the NOP process, a commenter requested the protection of an open area of trees that are greater than 50 years old. Within the disturbed habitat on the Project site is an area of mature pine and eucalyptus trees that were planted as part of the landscaping for the residences on the site. There is no evidence that they would meet the criteria for preservation from either a cultural resources or biological resources perspective. Removal of the mature trees would not result in a cultural resources impact. Please see Section 2.2 (Biological Resources) of this DSEIR for an analysis of these trees to provide habitat for raptors.

Consistency with General Plan

The Project's consistency with the applicable General Plan cultural resources goals and policies is analyzed in Table 2.3-1, Project Consistency with Applicable General Plan Goals and Policies. As shown in Table 2.3-1, the Project is consistent with the applicable General Plan goals and policies. Thus, no impact is identified related to General Plan consistency.

Consistency with SFVSP

The Project's consistency with the SFVSP's cultural resources objective and policy and policies is analyzed in Table 2.3-2, Project Consistency with Applicable SFVSP Policies. As shown in Table 2.3-2, the Project is consistent with the SFVSP's objectives and policies. Thus, no impact is identified related to SFVSP consistency.

RPO

Neither the Bunk House nor the Ranch House qualify under the RPO since they are not buildings that have formally been determined eligible for or listed in the National Register of Historic Places; have not been subject to the application of the Historic Resource ("H" Designator) Special Area Regulation; and are not one-of-a-kind, locally unique, or regionally unique cultural resources which contain a significant volume and range of data and materials. Therefore, no impact is identified under the RPO.

Summary of Analysis

In summary, historical research indicates that the Bunk House may have been built as war time housing in 1948, and moved to the Project site and present location in 1952. Over the years, it was subject to substantial modifications and alterations. The identity of the architect and/or builder is unknown. The Ranch House was designed by prominent architect Sim Bruce Richards and built by James C. Fowler & Son in 1955. Over the years, it was also modified and altered.

Neither the Bunk House nor the Ranch House are historically and/or architecturally significant. The buildings are not associated with any important events or individuals at the local or state levels; do not embody the distinctive characteristics of a type, period, or method of Modern Contemporary construction; do not represent the work of a master architect, craftsman, or builder, or of an important, creative individual; nor do they possess high artistic values.

As buildings which are not historically or architecturally significant under local or state significance criteria, they are not eligible for listing in the California Register of Historical Resources, the California Historic Resources inventory, or the San Diego County Local Register of Historic Resources. When evaluated for elements of integrity, the Bunk House does not possess any of the elements. The Ranch House retains location, materials, and workmanship, but does not possess design, setting, feeling, or association.

In summary, the Bunk House and Ranch House have not been determined to be historically and/or architecturally significant and, therefore, are not historical resources. Consequently, the Project's destruction, disturbance, or alteration of either building will not cause a substantial adverse change in the significance of historical resources. As such, a less than significant impact is identified and no mitigation is required.

2.3.3.3 Tribal Cultural Resources

Guidelines for the Determination of Significance

For the purposes of this DSEIR, any of the following will be considered a significant impact to tribal cultural resources:

- The Project, as designed, causes a substantial adverse change in the significance of a tribal cultural resource. This shall include the destruction or disturbance of a tribal cultural resource.
- Activities or uses damaging to tribal cultural resources as defined by the County RPO are proposed and the Project fails to preserve those resources.

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

The first guideline is selected because CEQA recommends evaluating tribal cultural resources to determine whether or not a proposed action would have a significant effect. The second guideline was selected because tribal cultural resources are protected under the RPO. Any project that would have an adverse impact (direct, indirect, and/or cumulative) on a significant tribal cultural resource as defined by these guidelines would be considered to have a significant impact on the environment.

Analysis

No tribal cultural resources were identified during the records search, literature review or Phase I cultural resource survey.

A Sacred Lands check and request for SB-18 consultation (January 6, 2014) was submitted to the Native American Heritage Commission (NAHC) who “failed to identify Native American cultural resources in the proposed project area”. The NAHC provided a list of eight tribes (Barona, Jamul, Kwaaymii, Mesa Grande, Santa Ysabel San Pasqual, Sycuan, and Viejas) whom the County should contact. The County contacted all of the listed tribes on January 22, 2014, and no response was received. No known tribal cultural resources are present. Therefore, no impact is identified under CEQA or the RPO.

2.3.4 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 that information. For sites considered less than significant, the information is preserved through recordation, test excavations and the preservation of their artifacts. 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 and filed with the County of San Diego and the South Coastal Information Center. The artifact collections from any potentially significant site would also be

curated at the San Diego Archaeological Center or a culturally-affiliated Tribal curation facility, or alternatively would be repatriated to a culturally-affiliated Tribe.

No on-site significant cultural resources or tribal cultural resources were identified. Similarly, the residential structures located on the Project site have been thoroughly evaluated and determined not to be historically and/or architecturally significant. There is, however, an identified potential for impacts to subsurface deposits or features that are currently not identified or recorded. The Project's potentially significant impacts to cultural resources would be reduced below a level of significance through the implementation of an archaeological monitoring program by a County-approved archaeologist and a monitor representing the local Luiseño Tribes during earth-disturbing activities as described in Section 2.3.6, below.

The cumulative study area covers a 3-mile radius around the Project site. This area was selected as it is similar to the radius used in the original SFVSP EIR and this would have been the locality in which typical day use would have occurred. Of the 20 cumulative projects considered within a 3-mile radius of the Project site, two projects were identified as having the potential to impact unidentified cultural resources (see Figure 1-11 and Table 1-2). These projects include TM 5556/Starwood Santa Fe Valley and the Black Mountain Ranch Subarea Plan Addendum. Both of these projects will incorporate cultural resources monitoring during construction, similar to the Project. Thus, impacts to any undiscovered or buried potentially significant cultural resources located within the cumulative projects' boundaries would be reduced below a level of significance by similar measures. Thus, all archaeological impacts associated with the related cumulative projects are expected to be less than significant and/or fully mitigated.

Future development within the cumulative study area would be subject to similar analysis and mitigation requirements pursuant to CEQA and RPO. Based on the compliance of the Project and related projects within the cultural resources cumulative study area with CEQA and RPO, and implementation of the archaeological monitoring measures presented in Section 2.3.6, the Project's cumulative cultural resources impact would be **less than significant**.

2.3.5 Significance of Impacts Prior to Mitigation

The following potentially significant impacts could occur with Project implementation:

- **Impact CR-1** Potential to identify previously unrecorded archaeological resources during project earth-disturbing activities.

2.3.6 Mitigation

Implementation of the following mitigation measure will be required as a condition of Project approval to reduce Impact CR-1 to below a level of significance:

- **M-CR-1** To mitigate for potential impacts to undiscovered buried archaeological resources including human remains, an archaeological monitoring program and potential data recovery program shall be implemented pursuant to the County

of San Diego Guidelines for Determining Significance for Cultural Resources and CEQA and shall include the following requirements:

- Pre-Construction
 - Pre-construction meeting to be attended by the Project Archaeologist and Luiseño Native American monitor to explain the monitoring requirements.

- Construction
 - Monitoring. Both the Project Archaeologist and Luiseño Native American monitor are to be onsite during earth disturbing activities. The frequency and location of monitoring of native soils will be determined by the Project Archaeologist in consultation with the Luiseño Native American monitor. The Project Archaeologist and Luiseño Native American monitor shall also evaluate fill soils to determine that they are clean of cultural resources.

 - If cultural resources are identified:
 - Both the Project Archaeologist and Luiseño Native American monitor have the authority to divert or temporarily halt ground disturbance operations in the area of the discovery.
 - The Project Archaeologist shall contact the County Archaeologist.
 - The Project Archaeologist in consultation with the County Archaeologist and Luiseño Native American shall determine the significance of discovered resources.
 - Culturally-affiliated Tribes shall be consulted should Tribal Cultural Resources be identified.
 - Construction activities will be allowed to resume after the County Archaeologist has concurred with the significance evaluation.
 - Isolates and non-significant deposits shall be minimally documented in the field. Should the isolates and non-significant deposits not be collected by the Project Archaeologist, the Luiseño Native American monitor may collect the cultural material for transfer to a Tribal curation facility or repatriation program.
 - If cultural resources are determined to be significant, a Research Design and Data Recovery Program shall be prepared by the Project Archaeologist in consultation with the Luiseño Native American monitor and approved by the County Archaeologist. The program shall include reasonable efforts to preserve (avoid) unique cultural resources or Sacred Sites; the capping of identified Sacred Sites or unique cultural resources and placement of development over the cap if avoidance is infeasible; and data recovery for non-unique cultural resources. The preferred option is preservation (avoidance).

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- If tribal cultural resources are identified, consultation shall be conducted with culturally-affiliated tribes to determine the appropriate mitigation.
 - Human Remains
 - The Property Owner or their representative shall contact the County Coroner and the PDS Staff Archaeologist.
 - Upon identification of human remains, no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin.
 - If the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be contacted by the Property Owner or their representative in order to determine proper treatment and disposition of the remains.
 - The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted.
 - Public Resources Code §5097.98, CEQA §15064.5 and Health & Safety Code §7050.5 shall be followed in the event that human remains are discovered.
 - Rough Grading
 - Upon completion of Rough Grading, a monitoring report shall be prepared identifying whether resources were encountered. The report shall be submitted to the South Coastal Information Center, the San Luis Rey Band of Mission Indians, and any culturally-affiliated Tribe who requests a copy.
 - Final Grading
 - A final report shall be prepared substantiating that earth-disturbing activities are completed and whether cultural resources were encountered. The report shall be submitted to the South Coastal Information Center, the San Luis Rey Band of Mission Indians, and any culturally-affiliated Tribe who requests a copy.
 - Disposition of Cultural Material.
 - The final report shall include evidence that all prehistoric materials have been curated at a San Diego curation facility or Tribal curation facility that meets federal standards per 36 CFR Part 79. Alternatively, the prehistoric materials may be repatriated to a culturally-affiliated Tribe.

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- The final report shall include evidence that all historic materials have been curated at a San Diego curation facility that meets federal standards per 36 CFR Part 79.

2.3.7 Conclusion

The Project may have significant impacts if unidentified artifact deposits are uncovered or unearthed during on- or off-site construction (Impact CR-1). Implementation of an archaeological monitoring program (M-CR-1) would ensure that no significant impacts to prehistoric or historic resources or human remains would occur as a result of Project development, thereby also ensuring compliance with CEQA and the *County of San Diego Report Significance Guidelines - Cultural Resources* (December 5, 2007).

Implementation of this mitigation measure would reduce the potentially significant impacts to **less than significant** levels because the mitigation measure would ensure that relevant information contained in the archaeological record, which is important in the understanding of prehistory and history, would be preserved.

The existing structures (Ranch House and Bunk House) on the Project site are not significant and removal of the structures would not cause a substantial adverse change in the significance of an historic resource as defined in Section 15064.5 of the State CEQA Guidelines. Therefore, the potential impact to historic resources would be **less than significant**.

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Goal/Policy	Project Consistency
<p>Goal COS-7: Protection and Preservation of Archaeological Resources.</p> <p>Protection and preservation of the County's important archaeological resources for their cultural importance to local communities, as well as their research and educational potential.</p>	<p>No important archaeological resources were identified on the project site. Mitigation measure M-CR-1 would be implemented to reduce impacts to any unidentified archaeological resources to below a level of significance. The Proposed Project is consistent with Goal COS-7.</p>
<p>Policy COS-7.1: Archaeological Protection.</p> <p>Preserve important archaeological resources from loss or destruction and require development to include appropriate mitigation to protect the quality and integrity of these resources.</p>	<p>No important archaeological resources were identified on the project site. Mitigation measure M-CR-1 would be implemented to reduce impacts to any unidentified archaeological resources to below a level of significance. The Proposed Project is consistent with Policy COS-7.1.</p>
<p>Policy COS-7.2: Open Space Easements.</p> <p>Require development to avoid archaeological resources whenever possible. If complete avoidance is not possible, require development to fully mitigate impacts to archaeological resources.</p>	<p>No archaeological resources were identified on the project site. Mitigation measure M-CR-1 would be implemented to reduce impacts to any unidentified archaeological resources to below a level of significance. The Proposed Project is consistent with Policy COS-7.2.</p>
<p>Policy COS-7.3: Archaeological Collections. Require the appropriate treatment and preservation of archaeological collections in a culturally appropriate manner.</p>	<p>Per mitigation measure M-CR-1, If cultural resources (Native American)) are identified during earth-disturbing activities, consultation with the Native American monitor shall be conducted to determine the appropriate manner in which to preserve the collections. This will ensure that any archaeological resources would be preserved in a culturally appropriate manner. The Proposed Project is consistent with Policy COS-7.3.</p>

Goal/Policy	Project Consistency
<p>Policy COS-7.4: Consultation with Affected Communities. Require consultation with affected communities, including local tribes to determine the appropriate treatment of cultural resources.</p>	<p>The County contacted representatives from the following local tribes on January 22, 2014: Barona, Jamul, Kwaaymii, Mesa Grande, Santa Ysabel San Pasqual, Sycuan, and Viejas). No responses or requests for tribal consultation were received in response to the County's outreach. The Proposed Project is consistent with Policy COS-7.4.</p>
<p>Policy COS-7.5: Treatment of Human Remains. Require human remains be treated with the utmost dignity and respect and that the disposition and handling of human remains will be done in consultation with the Most Likely Descendant (MLD) and under the requirements of Federal, State, and County Regulations.</p>	<p>No evidence of human remains, including those interred outside of formal cemeteries, was discovered during the records search, literature review or site surveys for the Proposed Project. There is no indication that the Project Site was used by Native Americans for religious, ritual, or other special activities. If human remains are identified during project grading, the disposition and handling of any human remains will be conducted in consultation with the Most Likely Descendant (MLD) and under the requirements of Federal, State, and County Regulations, as identified in mitigation measure M-CR-1. The Proposed Project is consistent with Policy COS-7.5.</p>
<p>Policy COS-7.6: Cultural Resource Data Management. Coordinate with public agencies, tribes, and institutions in order to build and maintain a central database that includes a notation whether collections from each site are being curated, and if so, where, along with the nature and location of cultural resources throughout the County of San Diego.</p>	<p>Mitigation measures M-CR-1 includes a requirement for curation at a San Diego curation facility or Tribal curation facility that meets federal standards per 36 CFR Part 79. Alternatively, the prehistoric materials may be repatriated to a culturally-affiliated Tribe. A final report would detail the curation or repatriation. In addition, a copy of the final report will be provided to the SCIC for data management. The Proposed Project is consistent with Policy COS-7.6.</p>

Goal/Policy	Project Consistency
<p>Goal COS-8: Protection and Conservation of the Historical Built Environment. Protection, conservation, use, and enjoyment of the County’s important historic resources.</p>	<p>The Project site does not contain any resources which were determined to be an important historic resource. Therefore, protection and conservation of the two single family residences and associated garages is not required. The Proposed Project is consistent with Goal COS-8.</p>
<p>Policy COS-8.1: Preservation and Adaptive Reuse. Encourage the preservation and/or adaptive reuse of historic sites, structures, and landscapes as a means of protecting important historic resources as part of the discretionary application process, and encourage the preservation of historic structures identified during the ministerial application process.</p>	<p>The Project site does not contain any important historic resources. They are not determined to be significant resources; therefore, neither preservation nor adaptive reuse is required. The Proposed Project is consistent with Policy COS-8.1.</p>
<p>Policy COS-8.2: Education and Interpretation. Encourage and promote the development of educational and interpretive programs that focus on the rich multicultural heritage of the County of San Diego.</p>	<p>As noted in Section 2.6.2.3, the project site did not have any important owners, tenants, and/or occupants associated with the buildings over the course of their existence to justify historical significance or importance to the history of San Diego County or its communities. No owners, tenants, or occupants affected the course of local, state, or national history. In particular, none of Howard G. Golem’s contributions or achievements has been determined to be historically significant. In addition, the onsite structures were not determined significant; therefore an education and interpretation program is not required. The Proposed Project is consistent with Policy COS-8.2.</p>

Objective/Policy	Project Consistency
<p>Objective CO-5: Protect and conserve significant cultural resource sites (archeological and historical) in the SPA.</p>	<p>Based upon the analysis in Section 2.6.3, the Project site does not support any significant archaeological or historical resources. The Proposed Project is consistent with Objective CO-5.</p>
<p>Policy CO-5.1: Sites identified as Significant-Mitigable through Avoidance/ Preservation in the Cultural Resources Technical Report shall be placed in the Open Space I land use designation. These are sites SDI-532/4935A; SDI-4935B; SDI-316; SDI-149; SDI-12,684; and SDI-12,685H.</p>	<p>None of the sites identified under this policy are located within the Project site. Therefore there is no requirement for an open space area onsite to preserve cultural resources. The Proposed Project would not preclude the preservation of these site. The Proposed Project is consistent with Policy CO-5.1.</p>
<p>Policy CO-5.2: Prior to or concurrently with approval of Final or Parcel Maps, issuance of grading permits or improvements plans in lieu of grading permits and prior to issuance of any other discretionary permits within the subject property, sites identified in Policy CO-5.1 shall be dedicated in permanent open space easements. The language of the easements shall describe permitted activities, if any, within the easement.</p>	<p>None of the sites identified in Policy CO-5.2 are located within the Project site. Therefore there is no requirement for an open space area onsite to preserve cultural resources. The Proposed Project would not preclude the preservation of these sites. The Proposed Project is consistent with Policy CO-5.2.</p>
<p>Policy CO-5.3: Prior to conditional approval of discretionary permits, areas that have not been surveyed for cultural resources that are located in development areas must be surveyed by a qualified archaeologist.</p>	<p>The Project site was surveyed by a County approved archaeologist. The results are summarized in the archeological report included as Appendix F of this SEIR. The Proposed Project is consistent with Policy CO-5.3.</p>
<p>Policy CO-5.4: All untested or unevaluated cultural resource sites are considered as important resources until testing proves otherwise.</p>	<p>The Project site was surveyed by a County approved archaeologist. The results are summarized in the archeological report included as Appendix F of this SEIR. No important cultural resources were identified on the project site. The Proposed Project is consistent with Policy CO-5.4.</p>