

## **2.4 Cultural Resources**

The assessment of the proposed project's potential to have an adverse effect on cultural resources is based on the following technical resource study: *Cultural Resources Survey and Evaluation Program for the El Monte Sand Mining Project* dated 2018 that was prepared by Laguna Mountain Environmental, Inc. The results of the analysis are presented below and the report is included as Appendix K to this EIR, with confidential records and maps on file at the County of San Diego, Planning and Development Services and deposited with the South Coastal Information Center (SCIC).

### **2.4.1 Existing Conditions**

#### **2.4.1.1 Environmental Setting**

##### Natural Setting

The proposed project is located within an east-west trending, alluvium-filled valley within the drainage of the San Diego River. The project area generally consists of a flat to gently sloping valley that includes accumulations of floodplain deposits (loose sands and gravels) related to the San Diego River drainage. Granitic rock outcrops dominate the elevated areas on either side of the valley. Elevations range from approximately 540 feet above mean sea level (MSL) at the eastern portion of the study site to approximately 420 feet above MSL at the western end of the site. The river basin extends in an east-west direction and consists of a low-flow natural channel and the associated floodplain (Chang 2018). Sand and mining operations that occurred onsite approximately 30 years ago have changed the original topography and have created a clearly defined river channel, which varies in width from 250 feet to nearly 400 feet. The channel is typically 10 to 20 feet lower than the elevations of the surrounding lands (Chang 2018).

##### Cultural Setting

Cultural resources include prehistoric and historic archaeological sites, structures, districts, places, landscapes, and any other physical evidence associated with human activity considered important to a culture, a subculture, or a community for scientific, traditional, religious, or any other reason. For the purposes of this analysis, cultural resources may be grouped into the following categories: archaeological resources, historic-period built resources (including architectural/engineering resources), and human remains.

A number of cultural resources have been identified within the project site and include prehistoric, historic-period, and multicomponent archaeological sites, as well as historic-period built resources, and prehistoric isolates. The prehistoric archaeological resources include habitation sites, artifact scatters, and isolated

artifacts mainly comprised of lithic debitage and/or ceramic sherds. The historic-period archaeological resources consist of artifacts and features related to ranching or stock grazing. The historic-period built resources consist of stand pipes related to water procurement and use for agricultural activities.

#### **2.4.1.2 Methodology**

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

- Archaeological site record and archival research was conducted at the SCIC for the project site 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 proposed 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 proposed project footprint which included transect spacing at intervals no greater than 15 meters. A Native American monitor, Frank Brown of the Viejas Band of Kumeyaay Indians, was present during the survey.
- A testing program was implemented for sites that would be impacted by the proposed project (CA-SDI-20798, CA-SDI-21861 and P-37-035818). In addition, a boundary determination was conducted for the southern portion of site CA-SDI-13652.
- 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.

The evaluation of cultural resources carried out for the proposed project is in conformance with, Section 21083.2 of the Public Resources Code, and the California Environmental Quality Act (CEQA). Statutory requirements of CEQA (Section 15064.5) were followed in evaluating the significance of the cultural resources.

#### **2.4.1.3 Records Search Results**

According to the records on file at the SCIC, there have been 70 cultural resource studies conducted within a one-mile radius of the project site. A total of 86 cultural resources have been documented within one mile of the project site boundary. Four previously recorded cultural resources (CA-SDI-13609, CA-SDI-13652, CA-SDI-17300, and P-37-034482) were identified within or immediately

adjacent (within 50 feet) to the 489-acre project site. Sites CA-SDI-13652 and CA-SDI-17300 have been previously evaluated and are considered significant prehistoric sites. The resources include three prehistoric archaeological sites (CA-SDI-13609 CA-SDI-13652, and CA-SDI-17300) and one historic feature (P-37-034482). These are described below; additional details are included in Appendix K.

Site CA-SDI-13609 consists of one granitic bedrock outcrop with one milling slick and measures approximately 2 m by 2 m. No associated artifacts were noted. The surveyors noted that larger granitic outcrops were located near the site and that other bedrock milling features may have been destroyed when El Monte Road was cut.

CA-SDI-13652 was first recorded as two separate sites (CA-SDI-4900 and -4913), but when combined, the entire site measured over 31,000 square meters. The site included three loci (A, B, and C). Locus A consisted of a large midden area, over 10 bedrock milling features, a rock shelter, and hundreds of fragments of ceramics, ground stone, and lithics. Locus B consisted of two bedrock milling features and a small concentration of ceramics. Locus C consisted of three bedrock milling features with more than 20 ceramic fragments, debitage, and a Desert Side-notched arrow point. For a subsequent project, a total of 38 shovel test pits were excavated, revealing a cultural deposit to a depth of 85 centimeters. Recovered artifacts included ceramics, lithics, ground stone, shell, burned and unburned faunal bone, and fire-affected rock. The tested portion of the site was determined to be a significant historical resource under CEQA and capping of this portion of the site was recommended. Capping was conducted in 2003. The site was revisited in 2006 and it was concluded that the site appeared to meet the qualification requirements for the County Resource Protection Ordinance (RPO). In 2009, the site boundary was expanded to the south and east, making the current site dimensions approximately 300 meters north-south by 550 meters east-west. Newly recorded artifacts included two granitic ground stone fragments and two fine-grained metavolcanic flakes at that time (Williams 2009:1-3). Both the capped and expanded portions of the site are located within the proposed project site.

Site CA-SDI-17300 was discovered during construction grading and measures 79 meters north-south by 225 meters east-west. Subsurface archaeological testing was conducted to determine site significance. Nineteen shovel test pits and one test unit were excavated, revealing a cultural deposit to a depth of 130 centimeters. Recovered artifacts included ground stone, lithics, ceramics, fire-affected rock, faunal bone, marine shell, and charcoal. It was determined that the site was a significant historical resource under CEQA, but did not appear to qualify for the RPO. The site was subsequently re-visited and it was concluded

that based on previous assessments, the site appears to meet the qualification requirements for the Local Register and RPO.

Resource P-37-034482 is the El Monte Pump Station. The resource's historic-period elements include a pump house, a small building that appears to be a control panel house, and multiple daylighting pipes and associated concrete features. The main structure has a Public Works Administration panel dating the facility to 1937.

### Historic Map and Aerial Photo Review

In addition to the SCIC records search, historic aerial photographs and historic maps were examined to identify potential historic-period built resources within the project area. Historic aerial photographs were available for the years 1953, 1964, 1968, 1971, 1980, 1989, 2003, and 2005 (historicaerials.com 2011). Historical maps and aerial photographs did not identify any extant or previous buildings or structures within the project area. Historical research indicates that the project area has remained largely undeveloped through time.

### Native American Consultation

A Sacred Lands File (SLF) search was conducted for the proposed project with the NAHC on September 12, 2016. The search indicated that sites that may be impacted by the proposed project are located within the area of potential effect (APE). The NAHC recommended contacting the Viejas Band of Kumeyaay Indians.

Tribal consultation per Assembly Bill 52 was initiated by the County on August 13, 2015. It included outreach and information requests to the Lipay Nation of Santa Ysabel (Santa Ysabel), the Viejas Band of Kumeyaay Indians (Viejas), and the Kwaaymii Laguna Band (Kwaaymii). On September 8, 2016, additional AB 52 consultation letters were sent to the Barona Group of Capitan Grande Indians (Barona), Campo Kumeyaay Nation (Campo), and Sycuan Band of the Kumeyaay Nation (Sycuan). The Jamul Indian Village (Jamul) was contacted on April 4, 2017. While several tribes requested Native American monitoring, no additional archaeological resources were identified as a result of consultation. A more detailed summary of Native American outreach pursuant to AB 52 is included in Section 3.8, Tribal Cultural Resources.

In addition, both survey efforts included the participation of Mr. Frank Brown, a representative of Viejas who served as Native American monitor. The testing and evaluation program included the participation of Mr. Fred Tesam, a representative of Viejas who served as Native American monitor. No issues or other concerns were raised by the monitors during the field studies.

#### **2.4.1.4 Survey Results**

The purpose of the cultural resources technical study was to relocate previously recorded resources and identify any new sites. A total of 41 cultural resources were encountered during the 2011 and 2015 surveys of the El Monte Sand Mining Project. Of these newly identified resources, five are historic-period resources, six are prehistoric archaeological sites, one is a multicomponent archaeological site, and 29 are isolates. Two of these resources have been previously recorded (CA-SDI-13652 and CA-SDI-17300). An additional two resources (CA-SDI-13609 and P-37-034482) were identified by the records search as being located outside of the project site and were not relocated. However, because they occur immediately adjacent to the project site, they are included in this analysis. Newly documented resources include five historic resources (CA-SDI-20798, P-37-034839, -034840, -035816, and -035818), four prehistoric sites (CA-SDI-20799, -20800, -21862, and -21863), one multicomponent site (CA-SDI-21861), and 29 isolates (P-37-032964, -032965, -032966, -032967, -032968, -032969, -032970, -032971, -032972, -032973, -032974, -032975, -032976, -035821, -035822, -035823, -035824, -035825, -035826, -035827, -035828, -035829, -035830, -035831, -035832, -035833, -035877, -035878, and -035879). A description of the 43 resources is included in Table 2.4-1.

#### **2.4.1.5 Testing Results and Resource Evaluations**

Additional investigations, including subsurface testing, detailed field documentation, and archival research were undertaken for prehistoric archaeological site CA-SDI-13652, historic archaeological site CA-SDI-20798, multicomponent site CA-SDI-21861, and historic built resource P-37-35818.

Resource CA-SDI-13652, a Late Prehistoric campsite, was subject to subsurface testing to determine if the southern boundary of the site extends into the proposed project direct impact area. As a result of the subsurface testing, no cultural materials were identified within the proposed project direct impact area.

Detailed field documentation and archival research were also completed for CA-SDI-20798, CA-SDI-21861, and P-37-035818. The archival research focused on historic land and water development in San Diego County in order to assess the significance of the three resources, which consist of water conveyance features. The resources were determined to not be significant.

### **2.4.1.6 Regulatory Framework**

#### **Federal**

##### **Section 106 of the National Historic Preservation Act (NHPA)**

The NHPA was passed in 1966 and set the foundation for much of the more specific legislation that guides cultural resource protection and management in local jurisdictions such as the County of San Diego. The Act established an Advisory Council on Historic Preservation to help implement and monitor it.

Prior to implementing an “undertaking” (e.g., issuing a federal permit), Section 106 of the NHPA requires federal agencies to consider the effects of their undertakings on historic properties and to afford the Advisory Council on Historic Preservation and the State Historic Preservation Officer a reasonable opportunity to comment. The goal of the Section 106 process is to identify historic properties potentially affected by the undertaking, assess its effects and seek ways to avoid, minimize, or mitigate any adverse effects on historic properties.

##### **National Register of Historic Places (NRHP)**

Developed in 1981, the NRHP is an authoritative guide to be used by Federal, State, and local governments, private groups and citizens to identify the Nation’s cultural resources and to indicate what properties should be considered for protection from destruction or impairment. Listing in the NRHP provides formal recognition of a property’s historical, architectural, or archaeological significance based on national standards. Cultural resources may be considered eligible for listing if they possess integrity of location, design, setting, materials, workmanship, feeling, and association. The criteria for determining eligibility are essentially the same in content and order as those outlined in CEQA.

#### **State**

##### **California Environmental Quality Act (CEQA)**

Section 15064.5 of the CEQA Guidelines, as amended, state that a cultural resource would be considered significant if it is:

1. A resource listed in, or determined to be eligible by the State Historical Resources Commission for listing in, the California Register (PRC §5024.1; Title 14 California Code of Regulations [CCR], Section 4850 et seq.).
2. A resource included in the local register of historical resources, as defined in Section 5020.1(k) of the PRC or identified as significant in an historical resource survey meeting the requirements of Section 5024.1(g) of the PRC, 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 (PRC Section 5024.1, Title 14 CCR, 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 the California Register, determined not to be eligible for listing in the California Register, not included in a local register of historical resources (pursuant to Section 5020.1[k] of the PRC), and not identified in an historical resources survey (meeting the criteria in Section 5024.1[g] of the PRC) does not preclude a lead agency from determining that the resource may be an historical resource as defined in PRC Sections 5020.1(i) or 5024.1.

In accordance with CEQA, cultural resources must be assessed for project-related actions that could directly or indirectly impact them. Under this scenario, impacts to cultural resources not deemed important according to the above criteria would be considered less than significant. A summary of on-site and off-site cultural resources is provided below, along with a determination as to the significance of the impact pursuant to Section 15064.5 of the CEQA Guidelines.

#### *California Register of Historical Resources (CRHR)*

The California Register is an authoritative guide for use by state and local agencies, private groups, and citizens to identify the State's historical resources. An historical resource can include any object, building, structure, site, area, or

place that is determined to be historically or archaeologically significant. The CRHR also identifies historical resources for State and local planning purposes, determines eligibility for State historic preservation grant funding, and provides a certain measure of protection under CEQA, including Traditional Cultural Properties.

To be eligible for the California Register, a prehistoric or historic-period property must be significant at the local, state, and/or federal level under one or more of the following four criteria:

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

A resource eligible for the California Register must meet one of the criteria of significance described above, and retain enough of its historic character or appearance (integrity) to be recognizable as a historic resource and to convey the reason for its significance.

#### *California Health and Safety Code Section 7050.5*

California Health and Safety Code Section 7050.5 requires that, in the event human remains are discovered, the County Coroner be contacted to determine the nature of the remains. In the event the remains are determined to be Native American in origin, the Coroner is required to contact the NAHC within 24 hours to relinquish jurisdiction.

#### *California Public Resources Code Section 5097.98*

California PRC Section 5097.98, as amended by Assembly Bill 2641, provides procedures that become applicable in the event that human remains of Native American origin are discovered during project implementation. PRC Section 5097.98 requires that no further disturbances occur in the immediate vicinity of the discovery, that the discovery be adequately protected according to generally accepted cultural and archaeological standards, and that further activities take into account the possibility of multiple burials. PRC Section 5097.98 further requires the NAHC, upon notification by a County Coroner, designate and notify a Most Likely Descendant (MLD) regarding the discovery of Native American



human remains. Once the MLD has been granted access to the site by the landowner and inspected the discovery, the MLD then has 48 hours to provide recommendations to the landowner for the treatment of the human remains and any associated grave goods.

In the event that no descendant is identified, or the descendant fails to make a recommendation for disposition, or if the land owner rejects the recommendation of the descendant, the landowner may, with appropriate dignity, reinter the remains and burial items on the property in a location that will not be subject to further disturbance.

### Local

#### San Diego County Resource Protection Ordinance

The San Diego County RPO protects significant cultural resources and does not allow non-exempt activities or uses to damage significant prehistoric or historic lands on properties under County jurisdiction. However, pursuant to Section 86.605(d) of the RPO, the proposed project is exempt from RPO regulations because it is a sand mining project and requires a Major Use Permit, which must comply with specific mitigation relevant to cultural resources.

#### San Diego County Grading Ordinance

Section 87.429 of the County's Grading and Clearing Ordinance states that should human remains or Native American artifacts be encountered during grading, all operations will be suspended in the area of the discovery and the relevant County official shall be contacted. The requirements of Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.99 shall be complied with.

### **2.4.2 Analysis of Project Effects and Determination as to Significance**

For the purpose of this EIR, the identified significance thresholds are based on criteria provided in the County Guidelines for Determining Significance for Cultural Resources. 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 requires 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 resource is provided below along with a determination as to the significance of the resource, pursuant to Section 15064.5 of the CEQA Guidelines.

### **2.4.2.1 Issue 1: Historic Sites**

#### Guidelines for the Determination of Significance

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

- 1) The project, as designed, 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 not consistent with the Secretary of Interior Standards.

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

Guideline 1 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. Any project that would have an adverse impact (direct, indirect, or cumulative) on significant historic resources as defined by these guidelines would be considered a significant impact.

#### Analysis

As a result of the historic resources survey, five historic resources were documented and either evaluated for significance according to CEQA (Section 15064.5) or assumed to be significant in the absence of further evaluation. These resources include three water well stand pipes (P-37-034839, -034840, and -035818), the El Monte Pump Station (P-37-034482), and a concrete well pad (P-37-035816). 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 K).

#### Historic Resources – Less than Significant

One of the historic resources (P-37-035818) within the proposed project development was evaluated for significance according to CEQA (Section 15064.5). Resource P-37-035818 consists of a well stand pipe. Archival research and additional field documentation, which could not identify the age or association of the historic feature and confirmed the limited extent of the resource itself, indicate that the resource does not have the potential to yield information important to the water development history within San Diego County. According to the evaluation, the resource is not significant according to CEQA

criteria because it (1) is 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) is not associated with the lives of persons important to our past, including the history of San Diego County or its communities, (3) does 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) lacks the potential to further answer questions related to understanding the history of the area. Since the resource is evaluated as not significant, any impacts incurred through the implementation of the proposed project will be less than significant.

#### Historic Resources – Significant

Four historic resources are located outside the direct impact area; their analysis is described in the following sections.

##### *P-37-034482*

Resource P-37-034482 is a historic-period built resource that consists of the El Monte Pump Station, which was constructed in 1937. The resource has not been previously evaluated for the California Register but is assumed to be significant for the purposes of this project. Resource P-37-034482 is located outside of but immediately adjacent to the project site.

##### *P-37-034839*

Resource P-37-034839 is a historic built resource consisting of a metal standpipe associated with water wells located within the San Diego River channel. The age of the well is unknown. The resource has not been formally evaluated, but is assumed to be significant for the purposes of this project and impacts to the resource would be considered significant.

##### *P-37-034840*

Resource P-37-034840 is a historic built resource consisting of a metal standpipe associated with water wells located within the San Diego River channel. The age of the well is unknown. The resource has not been formally evaluated, but is assumed to be significant for the purposes of this project and impacts to the resource would be considered significant.

### *P-37-035816*

Resource P-37-35816 is a historic built resource consisting of a poured concrete well pad with a capped bore hole. The resource is located outside of the project's limits of disturbance. The resource has not been formally evaluated, but is assumed to be significant for the purposes of this project and impacts to the resource would be considered significant.

These resources were not evaluated for significance; however, CEQA significance is assumed. Implementation of the proposed project will have a less than significant impact on these sites because they are located outside of the direct impact area and will be avoided. Potential impacts would not exceed the guidelines of significance because mitigation will be implemented to ensure avoidance.

### Indirect Impacts to P-37-034482, P-37-034839, P-37-034840, and P-37-035816

The El Monte Sand Mining Project could indirectly impact historic resources P-37-034482, P-37-034839, P-37-034840, and P-37-035816 through the implementation of the project. These four resources are assumed eligible for the purposes of this project. While outside the area of direct impacts, indirect impacts could affect the sites as a result of vandalism or inadvertent damage during site preparation and mining activities due to increased vehicle traffic and visitation to the sites. These impacts are reduced to less than significant because the following mitigation measures will be made conditions of approval: delineation of environmentally sensitive areas, archaeological and Native American monitoring of work activities within 100 feet of the resources, and periodic archaeological monitoring throughout project implementation. With the inclusion of these mitigation measures, impacts are mitigated to less than significant because there will not be a substantial adverse change in the significance of the historical resource as defined in §15064.5 of the State CEQA Guidelines. **(Impact CR-1)**

### **2.4.2.2 Issue 2: Archaeological Resources**

#### Guidelines for the Determination of Significance

For the purposes of this EIR the following will be considered a significant impact to archaeological resources:

- 1) The project, as designed, 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.

The significance guideline listed above has been selected for the following reasons:

Guideline 2 is derived directly from CEQA. Sections 21083.2 of the Public Resources Code and 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. Any project that would have an adverse impact (direct, indirect, cumulative) on significant archaeological resources as defined by these guidelines would be considered a significant impact.

### Analysis

As a result of the archaeological resources survey, nine archaeological resources (CA-SDI-13609, -13652, -17300, -20798, -20799, -20800, -21861, -21862, and -21863) were documented and evaluated for significance according to CEQA (Section 15064.5), or assumed to be significant in the absence of additional evaluation. These sites include two prehistoric habitation sites, two prehistoric lithic (including groundstone) scatters, two lithic and ceramic scatters, one prehistoric bedrock milling station, one historic period site containing several water well-related features, and one historic period site containing a water well stand pipe and a small artifact scatter. Each site is summarized below along with a determination as to the significance of the site. A detailed discussion of each site can be found in the archaeological resources study (Appendix K).

### Archaeological Resources – Not Significant

In addition to the archaeological sites, twenty-nine isolates (see Table 2.4-1) were identified during the cultural evaluation of the project site. The evaluation of these isolates included a survey assessment and artifact analysis. Isolates lack the potential to further answer questions related to the understanding of the prehistory of the area and thus, are not culturally significant resources as defined by CEQA and the County of San Diego guidelines. Since isolates are evaluated as not significant, any impacts incurred through the implementation of the proposed project will not be significant. Impacts do not exceed the guidelines of significance because the isolates have been removed (where relocated) and evaluated and it has been determined that there will not be an adverse change in the significance of the isolates.

### Archaeological Resources – Less Than Significant

Two archaeological resources were found to be less than significant.

*CA-SDI-20798*

Resource CA-SDI-20798 is a historic-period archaeological site consisting of a concrete block and cast iron watering trough, probable well, and two vertical metal poles. The trough is full of rusted barbed wire, sheet metal, rocks, red roof tiles, a colorless glass bottle and glass fragments. The glass bottle dates from 1930 to 1959 (Whitten 2011). Archival research and additional field documentation, which could not identify the age or association of the historic feature and confirmed the limited extent of the resource itself, indicate that the resource does not have the potential to yield information important to the water development history within San Diego County. As such, CA-SDI-21861 is recommended not eligible for the California Register and is not considered a historical resource.

*CA-SDI-21861*

This resource is a multi-component archaeological site consisting of one historic well stand pipe, two glass fragments, and two prehistoric lithic artifacts. Archival research and additional field documentation, which could not identify the age or association of the historic feature and confirmed the limited extent of the resource itself, indicates that the resource does not have the potential to yield information important to the water development history within San Diego County. As such, CA-SDI-21861 is recommended not eligible for the California Register and is not considered a historical resource. As an isolated occurrence, the prehistoric lithic artifacts (two volcanic flakes) are also not eligible for the California Register.

According to the evaluations, the resources are not significant according to CEQA 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 the resources are evaluated as not significant, any impacts incurred through the implementation of the proposed project will be less than significant.

### Archaeological Resources – Significant

Seven archaeological and historic resources either have been previously determined significant, or have not been evaluated and are assumed significant for the purposes of this project. They are described below.

### *CA-SDI-13609*

Resource CA-SDI-13609 is a prehistoric archaeological site consisting of one granitic bedrock outcrop with one milling slick and no associated artifacts. The site has not been previously evaluated for the California Register or RPO.

Resource CA-SDI-13609 is located outside of but immediately adjacent to the project site. The resource has not been formally evaluated, but is assumed to be significant for the purposes of this project and impacts to the resource would be considered significant.

### *CA-SDI-13652*

Resource CA-SDI-13652 is a prehistoric archaeological site consisting of a habitation site comprised of bedrock milling features, lithics, ground stone, and ceramics (Miller et al. 1977). The site includes three loci (A, B, and C): Locus A consists of a large midden area, over 10 bedrock milling features, a rock shelter, and hundreds of fragments of ceramics, ground stone, and lithics; Locus B consists of two bedrock milling features and a small concentration of ceramics; and Locus C consists of three bedrock milling features with more than 20 ceramic fragments, debitage, and a Desert Side-notched arrow point (Pigniolo et al. 1993).

In 1996, the site was subject to subsurface testing which revealed an extensive cultural deposit (Cook 1996). Based on the results of the testing, the site was determined to be a significant historical resource under CEQA and was capped in in 2003 as a protective measure. The capped portion of the site is located within the project site but outside the limits of disturbance. Site CA-SDI-13652 was relocated during the surveys within the north-central portion of the project area. The southern portion of the site overlaps the project and was relocated as a result of the surveys conducted for the project, and was subject to additional testing. Resource CA-SDI-13652 has been determined eligible for the California Register and qualifies as a historical resource. As such, impacts to the resource would be considered significant.

### *CA-SDI-17300*

Resource CA-SDI-17300 is a prehistoric habitation site discovered in 2005 during construction grading and is comprised of a 130-centimeter (cm) deep deposit that contains ground stone, lithics, ceramics, fire-affected rock, faunal bone, marine shell, and charcoal. This resource was previously determined to be eligible for the California Register and the RPO, and is a historical resource pursuant to CEQA. The resource is located outside of but immediately adjacent to the project's area of direct and will be avoided. As such, no impacts to this resource are anticipated.

### *CA-SDI-20799*

CA-SDI-20799 is a prehistoric archaeological site consisting of six groundstone and lithic artifacts located outside of the project's limits of disturbance. The resource has not been formally evaluated, but is assumed to be significant for the purposes of this project and impacts to the resource would be considered significant.

### *CA-SDI-20800*

CA-SDI-20800 is a prehistoric archaeological site consisting of five groundstone artifacts located outside of the project's limits of disturbance. The resource has not been formally evaluated, but is assumed to be significant for the purposes of this project and impacts to the resource would be considered significant.

### *CA-SDI-21862*

Resource CA-SDI-21862 is a prehistoric archaeological site consisting of a sparse ceramic and lithic scatter located within the San Diego River bed. The resource is located outside of the project's limits of disturbance. The resource has not been formally evaluated, but is assumed to be significant for the purposes of this project and impacts to the resource would be considered significant.

### *CA-SDI-21863*

The resource is a small prehistoric archaeological site consisting of a ceramic and lithic scatter. The resource is located outside of the project's limits of disturbance. The resource has not been formally evaluated, but is assumed to be significant for the purposes of this project and impacts to the resource would be considered significant.

The project design places five archaeological sites (CA-SDI-13609, -20799, -20800, -21862, and 21863) outside the limits of disturbance. These resources were not evaluated for significance; therefore, CEQA significance is assumed. These archaeological resources are identified as a bedrock milling feature, two prehistoric lithic scatters, and two prehistoric lithic and ceramic scatters. Implementation of the proposed project would have a less than significant impact on these sites because they will be preserved by their placement in dedicated open space; therefore, there will not be a substantial adverse change in the significance of the resources.

Indirect Impacts to CA-SDI-13609, -13652, -17300, -20799, -20800, -21862, and -21863



The El Monte Sand Mining Project could indirectly impact sites CA-SDI-13609, -13652, -17300, -20799, -20800, -21862, and -21863 through the implementation of this project. These seven resources have either been found significant or are assumed significant for the purposes of this project. While outside the area of direct impacts, indirect impacts could affect the sites as a result of vandalism or inadvertent damage during site preparation and mining activities due to increased vehicle traffic and visitation to the sites. These impacts are reduced to less than significant because the following mitigation measures will be made conditions of approval: delineation of environmentally sensitive areas, archaeological and Native American monitoring of work activities within 100 feet of the resources, and periodic archaeological monitoring throughout project implementation. With the inclusion of these mitigation measures, impacts are mitigated to less than significant because there will not be a substantial adverse change in the significance of the archaeological resource as defined in §15064.5 of the State CEQA Guidelines (**Impact CR-2**).

In addition, given the high number of archaeological resources located within or near the project site, there is potential for the presence of previously undiscovered, buried archaeological resources. Project implementation, including grading and excavation, could directly impact buried archaeological resources. If the archaeological resources are determined to be significant, impacts would be significant. These impacts are reduced to less than significant because the following mitigation measures will be made conditions of approval: delineation of environmentally sensitive areas, archaeological and Native American monitoring of work activities within 100 feet of the resources, and periodic archaeological monitoring throughout project implementation. With the inclusion of these mitigation measures, impacts are mitigated to less than significant because there will not be a substantial adverse change in the significance of the archaeological resource as defined in §15064.5 of the State CEQA Guidelines. (**Impact CR-3**)

### **2.4.2.3 Issue 3: Human Remains**

#### Guidelines for the Determination of Significance

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

- 2) The project, as designed, disturbs any human remains, including those interred outside of formal cemeteries.

The significance guideline listed above has been selected for the following reasons:

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. Any project that would have an adverse impact (direct, indirect, cumulative) on human remains as defined by this guideline would be considered a significant impact.

### Analysis

No evidence of human remains, including those interred outside of formal cemeteries, was discovered during the records search, literature review, field survey, or site testing and evaluation. 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.

#### **2.4.3 Cumulative Impact Analysis**

According to CEQA, the importance of cultural resources comes from the research value and the information that they contain. Therefore, the issue that must be explored in a cumulative analysis is the cumulative loss of 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 or avoided to avoid impacts also preserve the data.

The cumulative study area includes the El Monte Valley surrounding the project site and was selected because the similarity in types of natural resources, topography, and patterns of prehistoric and historic land use suggests that similar types of cultural resources would occur within the area. Within the cumulative study area, it is assumed that numerous sites are CEQA significant, including the two known resources within the proposed project area. Prehistoric and historic settlement patterns can be very broad; therefore, it is prudent to consider a large study area when evaluating cumulative impacts.

The cumulative projects in the vicinity of the El Monte Sand Mining Project are listed in Table 1-11 in the Project Description and are shown on Figure 1-12. Projects within the cumulative study area for cultural resources include primarily residential and commercial development projects, as well as two sand mining projects. One, the Greenhills Ranch residential development, identifies a potential for impacts to cultural resources, but many of the others do not have environmental data available. Given the confidential nature of archaeological resources, details on the resources that might occur within the projects are not known. Regardless, it can be assumed that projects in the study area have the potential to impact both known and unknown cultural resources that are or would be considered significant. However, because these projects would be subject to

the same state and County requirements as the current project, similar mitigation would be required to reduce impacts to less than significant.

Further, the proposed project's impacts to cultural resources would be reduced to less than significant through mitigation measures that include protective measures to ensure avoidance, monitoring of ground disturbing activities, and protocols for the treatment of unanticipated discoveries. As outlined above, the cultural resources located within the cumulative projects would be mitigated through similar measures, as well as dedication in open space easements, capping, and data recovery excavation, reporting and curation.

Because the proposed project and those projects identified within the cumulative impact study area are primarily mitigated by avoidance or the collection and curation of information and the preservation of the most important resources, adequate mitigation has occurred for in situ appreciation of and access to curated research materials for future generations. This reduces the potential for cumulative effects and the proposed project's cumulative cultural resources impact would be **less than significant**.

#### **2.4.4 Significance of Impacts Prior to Mitigation**

A total of 43 cultural resources would be impacted with the implementation of the proposed project. Of those, 29 isolates were determined to be not significant, two archaeological sites and one historic resources were determined to be not significant, and eleven were determined or assumed to be significant. Of these eleven significant resources, seven (CA-SDI-13652, CA-SDI-17300, CA-SDI-20799, CA-SDI-20800, CA-SDI-21862, CA-SDI-21863, P-37-35816) are located within the project area and four (CA-SDI-13609, P-37-034482, P-37-034839, and P-37-034840) are located adjacent to the project. The following significant impacts could occur with project implementation:

**Impact CR-1:** The proposed project could indirectly impact historic sites P-37-034482, P-37-034839, P-37-034840, and P-37-035816 as a result of site preparation and mining activities.

**Impact CR-2:** The proposed project could indirectly impact archaeological sites CA-SDI-13609, CA-SDI-13652, CA-SDI-17300, CA-SDI-20799, CA-SDI-20800, CA-SDI-21862, and CA-SDI-21863 as a result of site preparation and mining activities.

In addition, the following significant impact could occur to previously unknown archaeological resources.

**Impact CR-3:** The proposed project could directly impact previously undocumented, buried archaeological resources as a result of site preparation and mining activities.

### 2.4.5 Mitigation

The following mitigation measures will reduce direct and indirect impacts to significant, or assumed significant, cultural resources discussed above, including historic sites (Impact CR-1), archaeological sites (Impact CR-2), and undocumented archaeological sites (Impact CR-3). This is summarized in Table 2.4.2. The measures will also reduce impacts to any previously unidentified archaeological resources encountered during implementation of the proposed project.

#### ***M-CR-1: Open Space Easements***

CA-SDI-13562 and CA-SDI-17300 are archaeological resources that occur within the project area and have previously been determined significant. The Project proponent shall formally dedicate those portions of significant cultural resources CA-SDI-13652 and CA-SDI-17300 within the project area as Open Space (OS). Temporary protective fencing and/or other markers shall be erected around OS prior to any ground disturbing activities nearby (see M-CR-2); however, such OS shall not be identified specifically as cultural resources, in order to protect sensitive information and to discourage unauthorized disturbance or collection of artifacts. OS shall be identified as an “Environmentally Sensitive Open Space”.

#### ***M-CR-2: Environmentally Sensitive Areas/Temporary Fencing***

The Project proponent shall avoid sites CA-SDI-13609, CA-SDI-20799, CA-SDI-20800, CA-SDI-21862, CA-SDI-21863, P-37-034482, P-37-034839, P-37-034840, and P-37-035816 through the delineation of Environmentally Sensitive Areas (ESAs). The ESAs shall include a 50-foot buffer around each resource. Temporary protective fencing and/or other markers shall be erected around ESAs within the project area prior to any ground disturbing activities; however, such ESAs shall not be identified specifically as cultural resources, in order to protect sensitive information and to discourage unauthorized disturbance or collection of artifacts.

#### ***M-CR-3: Archaeological and Native American Monitoring***

A County-approved archaeologist (Project Archaeologist) shall be retained to carry out all mitigation measures related to archaeological resources. The County approved Project Archaeologist shall provide the contract or letter of acceptance to the County. It shall include an agreement that the archaeological monitoring will be completed, and a Memorandum of Understanding (MOU) between the Project Archaeologist and the County of San Diego shall be executed. The contract or letter of acceptance shall include a cost estimate for the monitoring work and reporting. The Project Archaeologist shall provide evidence that a Kumeyaay Native American has been contracted to perform Native American Monitoring for the project. The Project Archaeologist and Kumeyaay Native

American monitor shall attend the preconstruction meeting with the contractors to explain and coordinate the requirements of the archaeological monitoring program.

A monitoring plan shall be prepared prior to the issuance of grading or excavation permits and prior to any project-related ground disturbing activities. The monitoring plan shall be prepared and implemented by the qualified archaeologist, and shall include measures designed to avoid and protect known archaeological resources, and for the treatment of unknown archaeological resources that may be encountered during project implementation. The monitoring plan shall address, at a minimum, the measures outlined below:

1. Avoidance and Protection of Known Significant Resources

Two resources (CA-SDI-13609 and P-37-034482) are located adjacent to the limits of disturbance and will be established as OS (M-CR-1). The monitoring plan shall outline measures designed to insure that no direct or indirect impacts occur to these two resources. The monitoring plan shall include, at a minimum, the following measures:

a) Monitoring of Ground Disturbance adjacent to the Resources

Archaeological and Native American monitoring shall be conducted for any ground disturbance within the portion of the limits of disturbance that is adjacent to resources CA-SDI-13609 and P-37-034482. The archaeological monitor shall work under the direction of the qualified archaeologist. In the event that cultural materials are discovered, the provisions for unanticipated discoveries of archaeological materials and/or human remains, as outlined below under the heading "Protection of Unknown Resources," shall be implemented.

2. Avoidance and Protection of Assumed Significant Resources

Full-time archaeological and Native American monitoring of ground disturbance within *100 feet (30 meters)* of ESAs shall be conducted to insure that the sites are not inadvertently impacted (M-CR-2). The archaeological monitor shall work under the direction of the qualified archaeologist. In the event that cultural materials are discovered, the provisions for unanticipated discoveries of archaeological materials and/or human remains, as outlined below under the heading "Protection of Unknown Resources," shall be implemented.

a) Monitoring of ESAs throughout Project Implementation

In addition to the measure above, periodic archaeological monitoring of ESAs shall be conducted at times when no ground disturbance is

scheduled to occur. The archaeological monitor shall work under the direction of the qualified archaeologist, who shall determine the timing of monitoring, in consultation with the County. The monitor shall inspect the ESAs and general vicinity to verify that: (1) protective fencing or other markers are intact; (2) no unplanned ground disturbance is taking place; and (3) the site is not being inadvertently impacted by project-related activities, such as increased foot and vehicular traffic.

b) **Development of Long Term Management Plan**

As a component of the monitoring plan, a long-term management plan shall also be developed for those resources or portion(s) of resources that can be avoided during project construction, in order to minimize future impacts during project operation and maintenance. The management plan shall require that the boundaries of significant sites be appropriately delineated on project maps with prohibitions against future excavation and/or disturbance.

3. **Avoidance and Protection of Unknown Resources**

- a) The Project Archaeologist and Native American Monitor shall monitor all areas identified for development including off-site improvements.
- b) An adequate number of monitors (archaeological/historical/Native American) shall be present to ensure that all earth moving activities are observed and shall be on-site during all grading activities for areas to be monitored.
- c) During the original cutting of previously undisturbed deposits, the archaeological monitor(s) and Native American monitor(s) shall be onsite. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and locations of inspections will be determined by the Project Archaeologist in consultation with the Kumeyaay Native American monitor. Monitoring of cutting of previously disturbed deposits will be determined by the Project Archaeologist in consultation with the Kumeyaay Native American monitor.
- d) In the event that previously unidentified potentially significant cultural resources are discovered:
  - i) The Project Archaeologist or the Kumeyaay Native American monitor shall have the authority to divert or temporarily halt ground disturbance operations in the area of discovery to allow evaluation of potentially significant cultural resources.

- ii) At the time of discovery, the Project Archaeologist shall contact the PDS Staff Archaeologist.
  - iii) The Project Archaeologist, in consultation with the PDS Staff Archaeologist and the Kumeyaay Native American Monitor, shall determine the significance of the discovered resources.
  - iv) Construction activities will be allowed to resume in the affected area only after the PDS Staff Archaeologist has concurred with the evaluation.
  - v) Isolates and clearly non-significant deposits shall be minimally documented in the field. Should the cultural materials for isolates and non-significant deposits not be collected by the Project Archaeologist, then the Kumeyaay Native American monitor may collect the cultural material for transfer to a Tribal Curation facility or repatriation program.
  - vi) A Research Design and Data Recovery Program to mitigate impacts to significant cultural resources shall be prepared by the Project Archaeologist in coordination with the Kumeyaay Native American Monitor. The Research Design and Data Recovery Program shall include (1) reasonable efforts to preserve (avoidance) "unique" cultural resources or Sacred Sites; (2) the capping of identified Sacred Sites or unique cultural resources and placement of development over the cap, if avoidance is infeasible; and (3) data recovery for non-unique cultural resources.
  - vii) The County Archaeologist shall review and approve the Program, which shall be carried out using professional archaeological methods.
- e) If any human remains are discovered:
- i) The Property Owner or their representative shall contact the County Coroner and the PDS Staff Archaeologist.
  - ii) 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.
  - iii) If the remains are determined to be of Native American origin, the NAHC shall immediately contact the Most Likely Descendant (MLD).

- iv) 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.
  - v) The MLD may, with the permission of the landowner, or their authorized representative, inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site.
  - vi) 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.
- f) In the event that previously unidentified cultural resources are discovered, all prehistoric archaeological materials collected during the archaeological monitoring program shall be submitted and curated at a San Diego curation facility or a culturally affiliated Native American Tribal curation 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, including title, shall be transferred to the San Diego curation facility or culturally affiliated Native American Tribal curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility stating that the prehistoric archaeological materials have been received and that all fees have been paid.

or

Evidence that all prehistoric materials collected during the grading monitoring program have been repatriated to a Native American group of appropriate tribal affinity. Evidence shall be in the form of a letter from the Native American tribe to whom the cultural resources have been repatriated identifying that the archaeological materials have been received.

Historic materials shall be curated at a San Diego curation facility, as identified above, and shall not be curated at a Tribal curation facility or



repatriated. The collections and associated records, including title, shall be transferred to the San Diego curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility stating that the historic materials have been received and that all fees have been paid.

- g) In the event that previously unidentified cultural resources are discovered, a report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed and submitted to the satisfaction of the Director of PDS prior to the issuance of any building permits. The report shall include Department of Parks and Recreation Primary and Archaeological Site forms.
- h) In the event that no cultural resources are discovered, a brief letter to that effect shall be sent to the Director of PDS by the consulting archaeologist that the grading monitoring activities have been completed.

#### 2.4.6 Conclusion

A total of 29 isolates (P-37-032964, -032965, -032966, -032967, -032968, -032969, -032970, -032971, -032972, -032973, -032974, -032975, -032976, -035821, -035822, -035823, -035824, -035825, -035826, -035827, -035828, -035829, -035830, -035831, -035832, -035833, -035877, -035878, and -035879) were identified during the survey for the El Monte San Mining project. Isolates do not meet the eligibility criteria and are not unique resources per CEQA Section §15064.5. Therefore, they are not significant resources. Because these isolates are not significant, mitigation is not required.

A total of three cultural resources (CA-SDI-21861, CA-SDI-20798, and P-37-035818) were identified and evaluated for the El Monte Sand Mining project. These sites were documented and researched and determined to be not significant. Site documentation prepared during the survey and testing phase will be archived at a local repository. No artifacts were collected. The evaluation and recordation will exhaust all resource potential. Mitigation is not required.

Two sites (CA-SDI-13652 and CA-SDI-17300) were determined CEQA significant during previous investigations. Mitigation in the form of avoidance through establishment of open space easement (**M-CR-1**) will be implemented; therefore, no adverse change in the sites' significance will occur as a result of project implementation. There is potential for indirect impacts during project grading. In addition to the establishment of open space easements, additional mitigation for these indirect impacts will be implemented through the requirements of temporary fencing and grading monitoring during project construction (**M-CR-2**

and **M-CR-3**). Site documentation prepared during the survey and testing phase will be archived at a local repository. Artifacts collected will either be curated or repatriated. With the inclusion of these mitigation measures, project impacts will be reduced to less than significant.

Significance is assumed for nine sites (CA-SDI-13609, CA-SDI-20799, CA-SDI-20800, CA-SDI-21862, CA-SDI-21863, P-37-034482, P-37-034839, P-37-034840, and P-37-035816). These sites were not tested but will not be directly impacted by the project. Because of the potential for indirect impacts during project grading, mitigation in the form of establishment of environmentally sensitive areas, with temporary fencing and grading monitoring during project construction (**M-CR-2** and **M-CR-3**), will be made a condition of approval. Site documentation prepared during the survey and testing phase will be archived at a local repository. Any artifacts collected will either be curated or repatriated. With the inclusion of these mitigation measures, project impacts will be reduced to less than significant.

There is also potential for direct impacts to undocumented archaeological resources inadvertently discovered during project implementation. Mitigation for these direct impacts will be implemented through the requirement of monitoring during project construction (**M-CR-3**).

**Table 2.4-1: Resources in or Adjacent to the Project Area**

Resource No.	Resource Type	Description
CA-SDI-13609	Prehistoric Archaeological site	Bedrock Milling Station
CA-SDI-13652	Prehistoric Archaeological site	Bedrock Milling, Habitation & Rock Shelter
CA-SDI-17300	Prehistoric Archaeological site	Habitation Site
CA-SDI-20798	Historic archaeological site/features	Historic Trough and Well
CA-SDI-20799	Prehistoric Archaeological site	Lithic Scatter and Manos
CA-SDI-20800	Prehistoric Archaeological site	Manos (5)
CA-SDI-21861	Multicomponent site	Multi-component Site: Well Standpipe and Flake
CA-SDI-21862	Prehistoric Archaeological site	Sparse Artifact Scatter
CA-SDI-21863	Prehistoric Archaeological site	Prehistoric Site (2 flakes and 1 ceramic sherd)
P-37-035816	Historic feature	Historic Concrete Well Foundation
P-37-035818	Historic feature	Historic Well Standpipe

<b>Resource No.</b>	<b>Resource Type</b>	<b>Description</b>
P-37-034839	Historic feature	Historic Well Standpipe
P-37-034840	Historic feature	Historic Well Standpipe
P-37-034482	Historic feature	Historic Pump Station
P-37-032964	Prehistoric isolate	Isolate Flake
P-37-032965	Prehistoric isolate	Isolate Mano and Flake
P-37-032966	Prehistoric isolate	Isolate Mano
P-37-032967	Prehistoric isolate	Isolate Shell and Bone (modern?)
P-37-032968	Prehistoric isolate	Isolate Metate and Ceramic Sherd
P-37-032969	Prehistoric isolate	Isolate Core
P-37-032970	Prehistoric isolate	Isolate Mano
P-37-032971	Prehistoric isolate	Isolate Shell
P-37-032972	Prehistoric isolate	Isolate Mano
P-37-032973	Prehistoric isolate	Isolate Mano
P-37-032974	Prehistoric isolate	Isolate Manos
P-37-032975	Prehistoric isolate	Isolate Mano
P-37-032976	Prehistoric isolate	Isolate Flake
P-37-035821	Prehistoric isolate	Isolate Flake
P-37-035822	Prehistoric isolate	Isolate Mano
P-37-035823	Prehistoric isolate	Isolate Flake
P-37-035824	Prehistoric isolate	Isolate Flake
P-37-035825	Prehistoric isolate	Isolate Flake
P-37-035826	Prehistoric isolate	Isolate Projectile Point
P-37-035827	Prehistoric isolate	Isolate Flake
P-37-035828	Prehistoric isolate	Isolate Flake
P-37-035829	Prehistoric isolate	Isolate Flake
P-37-035830	Prehistoric isolate	Isolate Flake
P-37-035831	Prehistoric isolate	Isolate Flake and Hammerstone
P-37-035832	Prehistoric isolate	Isolate Scraper
P-37-035833	Prehistoric isolate	Isolate Groundstone and Flake
P-37-035877	Prehistoric isolate	Isolate Flake
P-37-035878	Historic-period isolate	Ceramic Sherd
P-37-035879	Multicomponent isolate	Isolate Metate and Historic Ceramic Sherd

**Table 2.4-2: Impacts to Significant Resources Within and Immediately Adjacent to Project Area**

<b>Primary # (P-37-)</b>	<b>Trinomial (CA-SDI-)</b>	<b>Other Identifier</b>	<b>Description</b>	<b>Resource Significance</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Impact Significance after Mitigation</b>
-	13609*	-	Prehistoric; BRM	Assumed significant in absence of testing	CR-2	M-CR-2; M-CR-3	None
-	13652	-	Prehistoric; Habitation Site	Previously Recommended Significant	CR-2	M-CR-1; M-CR- 2; M-CR-3	Less than significant with mitigation
-	17300	-	Prehistoric; Habitation Site	Previously Recommended Significant	CR-2	M-CR-1; M-CR- 2; M-CR-3	Less than significant with mitigation
032957	20799	Helix-3	Prehistoric; Lithic Scatter	Assumed significant in absence of testing	CR-2	M-CR-2; M-CR-3	Less than significant with mitigation
032958	20800	Helix-4	Prehistoric; Groundstone	Assumed significant in absence of testing	CR-2	M-CR-2; M-CR- 32	Less than significant with mitigation
034482*	-	El Monte Pump Station	Historic; El Monte Pump Station	Assumed significant in absence of testing	CR-1	M-CR-2; M-CR-3	None
034839	-	Well 1	Historic well	Assumed significant in absence of testing	CR-1	M-CR-2; M-CR-3	Less than significant with mitigation
034840	-	Well 2	Historic well	Assumed significant in absence of testing	CR-1	M-CR-2; M-CR-3	Less than significant with mitigation
035816	-	EIMonte-MDV- 001-H	Historic; Poured-Concrete Well Foundation	Assumed significant in absence of testing	CR-1	M-CR-2; M-CR-3	Less than significant with mitigation

**Table 2.4-2: Impacts to Significant Resources Within and Immediately Adjacent to Project Area**

<b>Primary # (P-37-)</b>	<b>Trinomial (CA-SDI-)</b>	<b>Other Identifier</b>	<b>Description</b>	<b>Resource Significance</b>	<b>Impact</b>	<b>Mitigation</b>	<b>Impact Significance after Mitigation</b>
035819	21862	EIMonte-MDV-006-P	Prehistoric; Artifact Scatter	Assumed significant in absence of testing	CR-2	M-CR-2; M-CR-3	Less than significant with mitigation
035820	21863	EIMonte-MDV-007-P	Prehistoric; Artifact Scatter	Assumed significant in absence of testing	CR-2	M-CR-2; M-CR-3	Less than significant with mitigation

\*Indicates resource is located immediately adjacent to project area

SOURCE: ESA, 2016.

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