

## **2.5 Cultural Resources**

This section analyzes cultural resources impacts from the Otay Ranch Village 14 and Planning Areas 16/19 (Proposed Project) that exist within the Project Area, including off-site improvement areas, based on available reports and site-specific studies. Information provided in this section was incorporated from the following sources: the Otay Ranch Final Program Environmental Impact Report (Otay Ranch PEIR) (City of Chula Vista and County of San Diego 1993a); County of San Diego (County) General Plan (County of San Diego 2011a); the County General Plan Update Final EIR (County of San Diego 2011b); and the cultural resources report prepared for the Proposed Project (Dudek 2018; Appendix 2.5-1 to this EIR). The Dudek 2018 study includes a Phase I inventory performed by Brian F. Smith and Associates and a Phase II evaluation performed by Dudek for the Proposed Project between May 2016 and December 2017. The Phase I and Phase II studies covered 3,127 acres, although the Proposed Project is limited to a 2,348-acre area of potential effects (APE). The area of direct impact (ADI) consists of 1,369 acres that constitutes the Project Area, which is composed of 1,283.6 acres owned by the applicant in Village 14 and Planning Areas 16/19 and 85.4 acres of off-site improvements. The remaining 979 acres within the APE, but outside the ADI, would be dedicated open space and would not be developed. The Phase II portion of the study evaluates those archaeological sites within the ADI. Confidential records and maps associated with Appendix 2.5-1 are on file at the County Planning & Development Services department and deposited with the South Coastal Information Center (SCIC).

This section tiers from the 1993 Otay Ranch PEIR because the Proposed Project is within the boundaries of the Otay Ranch General Development Plan/Subregional Plan (City of Chula Vista and County of San Diego 1993b), and development of the Project Area was analyzed in the Otay Ranch PEIR. The Otay Ranch PEIR determined that impacts to cultural resources would be potentially significant. Implementation of mitigation measures at the specific plan amendment level would ensure mitigation of Proposed Project–related impacts to below a level of significance.

Following the issuance of the Notice of Preparation for the Proposed Project, the lead agency, the County, received comment letters from public entities regarding cultural resources. Comments included a recommendation of consultation with all applicable California Native American tribes in accordance with Assembly Bill 52 and Senate Bill 18, as well as the preparation of a cultural resources assessment to be included in the EIR. Commenters also recommended that the Proposed Project include tribal cultural resources (TCRs) in the California Environmental Quality Act (CEQA) analysis. These resources are analyzed in Section 2.11, Tribal Cultural Resources, of this EIR. The analysis presented in this section addresses each cultural resources topic.

## 2.5.1 Existing Conditions

### 2.5.1.1 Environmental Setting

An initial records search was conducted by staff at the SCIC at San Diego State University in advance of the intensive pedestrian survey of the Project Area. Dudek performed an in-house records search of SCIC records in November 2016 for the APE and a 1-mile radius around the APE. The records search involved a review of previously recorded cultural resources, previous cultural resources investigations and their limits within the Project Area, historic addresses, and a historic maps database. Nine previous cultural reports were conducted within a 1-mile radius of the Project Area. All nine of the previous cultural reports address all or a portion of the APE. The records search indicated that 94 cultural resources were previously recorded within the records-search area. Of these, 8 are located outside the APE, 34 are in the APE (but outside the ADI), and 51 are located in the ADI. These previously recorded resources include 73 archaeological sites, 15 isolates, and six historic structures.

### 2.5.1.2 Methodology

The presence and significance of existing cultural resources associated with the Proposed Project were determined using the methodologies outlined below. Methodologies included a review of institutional records and reports for the Project Area and immediate vicinity; consultation with Native Americans; a field survey; surface mapping; artifact collection; bedrock-milling graphic and photographic documentation; historic structures assessment; and excavation of shovel test pits (STP), surface scrape units, and control units (CUs) to determine the extent, integrity, and constituents of site deposits. Site record forms (including updates) were prepared and submitted to the SCIC. As previously stated, an initial records search was conducted by staff at the SCIC at San Diego State University in advance of the intensive pedestrian survey of the ground surface of the Project Area. An in-house records search of SCIC records in November 2016 for the APE and a 1-mile radius around the APE was performed.

### Field Methods

A total of 109 cultural resources were encountered during the survey and evaluation efforts of Planning Areas 16/19. Of these identified resources, 17 sites are historic, 80 are prehistoric, and 12 contain both historic and prehistoric components. Of these sites, 94 were previously recorded. The survey also identified 18 new sites and 0 isolates. In spite of an intensive relocation effort, 21 sites that were previously recorded were not relocated during the current survey (i.e., seven isolates, five lithic scatters, one quarry, one bedrock milling station, one unknown prehistoric site, four historic structures, one historic refuse scatter with a rock feature, and one historic refuse scatter and bedrock milling station). These sites may have been lost as a result of

agricultural disturbances or illicit collection of artifacts, or they may have been mapped incorrectly and are located outside the Project Area. A description of sites is included in Tables 2.5-1 through 2.5-3.

### Phase I Inventory

An initial Phase I cultural resources inventory was completed on February 11, 2015, for the Proposed Project (Appendix 2.5-1). A pedestrian survey of the Project Area was performed between August 2014 and February 2015. For the pedestrian survey performed between August 2014 and February 2015, archaeological sites are defined as consisting of three or more artifacts in a 25-square-meter (approximately 270-square-foot) area or the presence of at least one feature, with sites delineated from each other by an absence of cultural materials over a distance of 30 meters (approximately 100 feet).

The pedestrian survey was conducted in intervals of 20 meters (approximately 66 feet) or less, with variations in actual survey transect spacing dependent on ground visibility. Areas with dense vegetation required shorter 10-meter (approximately 33-foot) transect spacing, and areas with excellent ground visibility at times allowed for a maximum transect width of 20 meters (approximately 66 feet).

Upon the identification of a site, visible artifacts were marked with pin flags to delineate the approximate size and boundaries of its surface deposit. Once artifacts and features were identified, crew members prepared field notes, recorded the approximate surface artifact inventory, identified features, photographed the site, and recorded Universal Transverse Mercator coordinates of site components. Each new site was assigned a temporary resource identifier for tracking during post-field data processing. No artifact collections were made during the inventory.

### Phase II Archaeological Evaluation

The Phase II evaluation was directed at sites located wholly or partially in the ADI, which comprises an area of approximately 1,369 acres. The Phase I inventory identified 109 cultural resources found within the study area, 57 of which are located within the ADI. Evaluation efforts were focused on the 57 cultural resources that fall within the ADI area because none of the cultural resources located outside the ADI would be directly or indirectly impacted by the development and would be preserved within the Multiple Species Conservation Program (MSCP) Preserve. The 57 evaluated resources consist of 11 isolates, two historic structures, and 44 sites (two isolates identified in the survey were upgraded to sites based on the identification of additional artifacts during the evaluation). A portion of one of the resources located within the ADI was not evaluated because access to the site was not possible at this time. The County has used its discretion to determine that the eastern portion of this site, CA-SDI-12397, is significant, and mitigation

measures to address this resource are presented below. Furthermore, testing efforts for each resource were conducted only within those portions of the site that fall within the ADI. Portions of cultural resources that fall outside the ADI were not evaluated because they would be preserved within the Otay Ranch RMP/MSCP Preserve.

Site evaluation included the relocation of artifact concentrations, features, and landforms as described in the original site forms and inventory letter report. Each site was subjected to an intensive surface survey with regular-interval sweeps of the site surface and pin flagging of artifacts, concentrations, and features to confirm the originally mapped items and site boundaries. After the site was defined with pin flags, the artifacts were collected, and their positions were recorded with a decimeter-accurate Trimble GPS unit and a third-generation iPad equipped with georeferenced Proposed Project maps.

Concentrations or areas where artifact density was relatively higher than other portions of the site were mapped and collected separately from any artifacts and materials collected at a non-specific location. Non-specific, site-wide surface collection was the minimal collection method conducted at every site where artifacts were still present. Some resources encountered in the ADI were previously collected, and no additional cultural materials were noted; therefore, no surface collections were made.

Three types of units were used for field evaluations for the Proposed Project. All units were excavated with square corners to enable their expansion to more thoroughly explore deposits. STPs are small (0.5-meter [approximately 1.6-foot] by 0.25-meter [approximately 0.8-foot] exploratory units excavated in 20-centimeter [approximately 8-inch] increments to depths of no more than 80 centimeters [approximately 31 inches]) and typically spaced at 10- to 20-meter (approximately 39-foot to 66-foot) intervals or subjectively placed. The second type of excavation unit, controlled surface collection (CSC), measures 5 meters by 5 meters (approximately 16 feet by 16 feet) and was divided into four individual 2.5-meter (approximately 8-foot) quadrants (quadrants A to D) where all cultural materials noted on the ground surface were mapped and then collected by quadrant, with close attention paid to any specific spatial distributions found within the CSC. CSCs were placed in areas identified through both re-survey and STP excavation as having higher concentrations of artifacts, and when possible, at least one CSC was placed in such concentrations. In cases where surface artifacts were present, but the STPs and other excavated units strongly suggested minimal subsurface cultural deposits, a third unit type, surface scrape units (SSU), typically measuring between 2 meters by 2 meters (approximately 6.5 feet by 6.5 feet) and 3 meters by 3 meters (approximately 10 feet by 10 feet), was excavated in one 10-centimeter (approximately 4-inch) level in an effort to collect the maximum artifact deposit with only minimal excavation locations where the potential for sediment accumulation was limited (e.g., areas of near-surface bedrock or erosional surfaces). When substantial quantities of artifacts were uncovered and identified during STP or SSU excavation, a 1-meter by 1-meter (approximately 3.3-foot by 3.3-foot) CU was used to explore

the feature. CUs are typically excavated in standard 10-centimeter (approximately 4-inch) levels. No CUs were excavated because no substantial subsurface deposits were identified.

All excavated matrix was screened through 1/8-inch mesh. Most of the excavation at prehistoric sites terminated between 20 and 40 centimeters (approximately 8 inches and 16 inches) below the surface, when either subcultural compact sediments or bedrock was typically encountered. Sediment profiles from STPs were recorded and photographed where appropriate, with small sediment samples taken for Munsell color and constituent classification.

The sites were mapped using a Trimble Pathfinder GPS receiver with real-time correction capabilities and down to 10-centimeter (4-inch) accuracy to plot all surface artifacts; excavation units (STPs, CSCs, and SSUs); and the boundaries of any defined loci, concentrations, and features. The GPS was also used to record site boundaries, landform edges, drainages, roads, and other relevant surface information. In addition to the mapping, a series of overview photographs were taken to show the site landscape situation and condition. Photographs were also taken of features or other site attributes when appropriate.

### Laboratory and Cataloging Procedures

Lab procedures included cleaning (as appropriate), sorting, and cataloging of all items. Each item was individually examined and cataloged according to class, subclass, and material; counted (except for bulk invertebrate and vertebrate remains); and weighed on a digital scale. All coded data were entered into a Microsoft Access database. Data manipulation of a coded master catalog combining all sites was performed in Microsoft Excel.

The cultural material was sorted during cataloging into the following potential categories: 13 classes of prehistoric artifacts; two classes of ecofacts; ethnohistoric, historic, and modern items; and organic samples. The prehistoric artifact classes include debitage, cores, core tools, simple flake tools, formal flake tools, retouched flakes, bifaces, percussing tools, groundstone, ceramics, bone artifacts, shell artifacts, and miscellaneous items.

When possible, cores were separated by platform variability into subclasses such as multidirectional, unidirectional, and bifacial types. Debitage, including flakes and debris, was sorted by material type and cortical variation (primary, secondary, and interior) during cataloging. Length, width, and thickness measurements were taken for all tools and cores using a sliding caliper.

Percussing tools, potentially including hammers and abraders, were defined based on their morphology and the type of macroscopic use-wear they exhibit. Groundstone artifacts were classified by type, including millings and handstones. Length, width, and thickness measurements were taken on complete groundstone items.

No historic artifacts were recovered and, therefore, not subject to laboratory procedures. After preliminary cataloging of material was completed, more detailed attribute analysis was performed. Stone artifacts (flaked and ground) were individually analyzed for selected morphological and technological attributes, as well as material and condition, in an attempt to gain insight into the period of occupation and the range of activities undertaken. All artifacts, ecofacts, and samples were subject to appropriate conservation in the field and laboratory, including proper packaging and handling. Artifact catalogs can be found in Appendix E of Appendix 2.5-1 to this EIR.

### Cultural Material Disposition

All materials recovered by Dudek from the Project Area were placed in 4-millimeter bags, along with artifact tags with the catalog number, an artifact description, and provenience information. All artifacts were then placed in archival-quality boxes. At the completion of the Proposed Project, all materials would be turned over for permanent curation to the San Diego Archaeological Center or a culturally affiliated tribal curation facility, or may be repatriated to a culturally affiliated tribe. All Department of Parks and Recreation forms and updates created by Dudek will be submitted to the SCIC at the completion of the Proposed Project.

### Native American Correspondence and Participation

The Native American Heritage Commission (NAHC) was contacted in June 2015 for a search of its Sacred Lands File for data relating to the Proposed Project and a list of persons and tribes that may have information related to the resources at the Project Area (Confidential Appendix C to Appendix 2.5-1). The Sacred Lands File request was resubmitted to the NAHC on May 9, 2016. The NAHC responded on May 16, 2016, stating that no resources are listed in the Sacred Lands File for this area, but they provided contact information for Native American tribes that may have additional information. Letters were sent to the tribes requesting information or concerns they may have related to the Proposed Project on July 21, 2016.

Although the current Proposed Project is located within the same APE as requested in previous searches, an additional request was submitted for the current Proposed Project in November 2016. The NAHC responded on December 2, 2016, stating that cultural sites are located in the APE. The NAHC recommended contacting the Campo Band of Diegueño Indians and provided a list of other tribal contacts that should be contacted regarding the Proposed Project. Letters were sent to each contact on the same day. To date, only the Jamul Indian Village responded. In a letter dated December 12, 2016, the Jamul Indian Village requested that it be informed of any resources discovered, and requested copies of reports, records searches, site records, and Sacred Lands File search results. The Jamul Indian Village also requested to participate in formal consultation for the Proposed Project.

Government-to-government consultation pursuant to Assembly Bill 52 and Senate Bill 18 was initiated on June 1, 2017, and June 2, 2017, respectively. Five tribes (Barona Band of Band of Mission Indians, Campo Band of Diegueño Indians, Jamul Indian Village, Ipay Nation of Santa Ysabel, and Viejas Band of Kumeyaay Indians) requested consultation. County staff met with these tribes to discuss Proposed Project components, impacts, and mitigation requirements. In addition, on September 12, 2017, a field visit was conducted with the tribes, County staff, applicant, and consultants. During consultation meetings and the field visit, it was requested that the tribes provide County staff with any issues or concerns. In addition, it was requested that they identify any TCRs that may be present within the APE. To date, no issues have been raised, and no information has been provided regarding TCRs. Refer to Section 2.11 for a discussion of Native American consultation pursuant to Assembly Bill 52 and Senate Bill 18. Tribal correspondence documents can be found in Confidential Appendix C to Appendix 2.5-1.

Red Tail Monitoring and Research Inc. provided Native American monitors during the inventory and evaluation phases of the Proposed Project. Gabe Kitchen and Justin Linton participated in the inventory. Mr. Kitchen, Mr. Linton, and Phillip Pena participated in the evaluation efforts. A specific concern was expressed to Dudek regarding the potential loss of data during the transfer of responsibilities between the two consulting companies. Dudek has worked with the applicant to obtain all available information from the survey to ensure no data are lost.

### **2.5.1.3 Results**

This section describes the results of the overall cultural resources study completed for the Proposed Project. The inventory results are presented first, focusing on resources identified in the APE but outside the ADI and sites identified during the inventory that are outside the APE, because these sites have been avoided by the Proposed Project design. The subsequent section presents the combined inventory and evaluation results of sites wholly or partially in the ADI.

#### **Inventory Results of the APE Outside the ADI**

During the Phase I inventory for the Proposed Project completed on February 11, 2015, Brian F. Smith and Associates identified 112 cultural resources within the 3,128-acre APE. Of these cultural resources, 94 were previously recorded sites, and 18 were newly discovered sites (Appendix 2.5-1). During the evaluation of one previously recorded historic structure, P-037-026524, historic-era foundations were identified along with a prehistoric artifact scatter that overlap a site identified during the survey as Temp-17. Following SCIC site recordation guidelines, P-37-026524 was merged with Temp-17 into one multicomponent resource. In addition, review of site records determined that the location of Temp-17 was previously recorded as Locus C of site CA-SDI-8086 (but was not mapped in the SCIC geographic information system database). During the evaluation, CA-SDI-11417 and CA-SDI-12378 were found to have

overlapping features and artifact scatters and were merged into one resource. As a result, the number of resources was reduced to 109. In total, 57 resources are located in or intersect the ADI, including 44 archaeological sites, 2 historic structures, and 11 isolates (each is discussed in detail in the following section). During the evaluation, no artifacts or resources were identified at seven of the previously recorded sites or at the one historic structure; these eight resources no longer qualify as sites, leaving 37 extant sites in the ADI.

Outside the ADI but within the APE, 34 resources were previously recorded, and 6 resources were newly identified, totaling 40 resources. Of these, 17 resources could not be relocated (nine sites, seven isolates, and two structures). An additional 13 resources (eight previously recorded, five newly recorded) have been recorded outside the APE, three of which were not relocated on the survey, leaving 33 resources that would be avoided and conserved within the Otay Ranch RMP/MSCP Preserve. Table 2.5-1, Evaluated Resources within the ADI, summarizes the results of the inventory study for resources located outside the ADI but within the APE. Table 2.5-2, Cultural Resources Identified in the APE but Outside the ADI, summarizes the resources located outside the APE. These resources can be seen on Figures 4-1a and 4-1b, Cultural Resource Results Map in Confidential Appendix D to Appendix 2.5-1.

### Evaluation Results of the APE Inside the ADI

A total of 57 cultural resources are located within the ADI (Appendix 2.5-1, Table 4-1, and Confidential Appendix E to Appendix 2.5-1, Figure 4-1). Due to the inability to access state-owned lands, 55 out of the 57 resources have been evaluated (in full or in part) during the current investigation, and one site (CA-SDI-12397) was not evaluated. Based on County Guidelines, in the absence of testing, the site was determined significant under CEQA Criterion 4 because of its scientific data potential. Based on surface characteristics, the portion of this site located within the ADI is not significant under the Otay Ranch Resource Management Plan (RMP) (it is not unique, does not contain human remains, is not formally listed on or determined eligible for the National Register of Historic Places (NRHP), does not have an H designator, and is not associated with religious or ceremonial uses). Because this resource cannot be avoided, mitigation measures would be incorporated to mitigate impacts to the resource.

As a result of the evaluation fieldwork, previously unidentified cultural materials and features (prehistoric and historic) were found in the vicinity of P-37-026524 that was originally recorded as a historic structure based on historic maps; these new artifacts connect P-37-026524 to a prehistoric site recorded by Brian F. Smith and Associates as Temp-17 on state-owned lands. According to SCIC site recordation guidelines, the overlapping prehistoric and historic-era deposits are treated as a single multicomponent site (with both historic and prehistoric materials). Further review of site records identified the location of Temp-17 as a previously recorded locus of site CA-SDI-8086 (Locus C); therefore, both the constituents of Temp-17 and P-37-026524

were re-designated as CA-SDI-8086C.<sup>1</sup> During the evaluation of P-37-015040 and P-37-015043, previously unrecorded artifacts were identified in sufficient quantities to qualify those resources as sites. The two sites were updated with the SCIC to establish trinomial numbers for the sites (CA-SDI-21924 and CA-SDI-21925, respectively). During the evaluation, sites CA-SDI-12313 and CA-SDI-12324 were downgraded from sites to isolates because insufficient artifacts were identified for them to retain their status as sites. Sites CA-SDI-11417 and CA-SDI-12378 were also merged into a single site during the evaluation because the artifact and features of each were found to overlap each other.

P-37-026522 and P-37-026526 were originally recorded based on the identification of single structures at these locations on the 1903 and 1912 topographic maps; no site visits were made at the time to confirm whether or not any structures, artifacts, or features were present. During the inventory phase of the Proposed Project, no evidence of these resources was identified. Because these resources no longer exist, they were evaluated as not significant/not eligible.

For the 57 resources (44 archaeological sites, two historic structures, and 11 isolates; Table 2.5-4, Management Summary) within the ADI, each resource is treated separately. Site assemblage compositions and distributions are detailed and used to assess the function and significance for each site. Sketch maps for each site showing excavation units, surface artifacts, and features are included in Confidential Appendix D to Appendix 2.5-1.

#### Evaluation Results of Isolates within the ADI

The Proposed Project design would not result in significant effects on isolated cultural resources. These isolated resources were evaluated to determine whether they are associated with additional cultural materials that might alter their “isolate” status. As previously discussed, the isolates were evaluated with the same methodology as the archaeological sites. Although STPs are not generally excavated for isolated cultural resources, the previously recorded locations of many of these isolates showed atypically larger boundaries than a normal point; therefore, one STP was excavated near the center of each isolate area. These STPs were excavated in an effort to determine if additional artifacts may be in the area because such large areas at the isolate implies more material may be present.

In total, 11 isolates identified within the ADI have been evaluated (P-37-12313 [downgraded from site CA-SDI-12313], P-37-13324 [downgraded from CA-SDI-12324], P-37-014834, P-37-015033, P-37-015035, P-37-015036, P-37-015038, P-37-015041, P-37-015042, P-37-015059, and P-37-015060). These neither meet the County Guidelines for significance (County of San

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<sup>1</sup> The two loci of CA-SDI-6695, A and B, are considered a single site. Additionally, the three loci of CA-SDI-8086, A B, and C, are considered a single site.

Diego 2007) nor are they eligible for listing in the California Register of Historical Resources (CRHR) or the local register. None are significant under CEQA or the Otay Ranch RMP.

The previously recorded isolates P-37-015040 and P-37-015043 are now considered sites (CA-SDI-21924 and CA-SDI-21925, respectively) as a result of the current investigation (see description above). However, these resources are not eligible for listing in the CRHR or local register, not eligible for protection under the Otay Ranch RMP guidelines, and not significant under CEQA. As sites, CA-SDI-21024 and CA-SDI-21925 are considered important under County Guidelines; however, impacts to those two sites can be reduced to less than significant through recordation and evaluation efforts described in this section, as well as curation of artifacts and monitoring of Proposed Project-related ground-disturbing activities. Updated site forms have been submitted to the SCIC for these resources. Two sites discussed previously (CA-SDI-12313 and CA-SDI-12324) were downgraded to isolates because they do not contain sufficient artifact quantities to qualify as sites. Updated Department of Parks and Recreation forms reflecting this change were submitted to the SCIC in August 2016.

#### **2.5.1.4 Regulatory Setting**

##### Federal Regulations

###### National Historic Preservation Act

The National Historic Preservation Act (16 U.S.C. 470 et seq.) establishes the nation's policy for historic preservation and sets in place a program for the preservation of historic properties by requiring federal agencies to consider effects to significant cultural resources (e.g., historic properties) prior to undertakings.

Section 106 of the National Historic Preservation Act requires federal agencies to take into account the effects of projects on historic properties, which are resources included in or eligible for the NRHP. It also gives the Advisory Council on Historic Preservation and the State Historic Preservation Offices an opportunity to consult. Federal agencies issuing permits for the Proposed Project would be required to comply with National Historic Preservation Act requirements.

###### National Register of Historic Places

The NRHP is the nation's official list of historic places. The NRHP is overseen by the National Park Service and requires that a property or resource eligible for listing in the NRHP meet one or more of the following four criteria at the national, state, or local level to ensure integrity and obtain official designation:

- The property is associated with events that have made a significant contribution to the broad patterns of our history.

- The property is associated with the lives of persons significant to our past. Eligible properties based on this criterion are generally those associated with the productive life of the individual in the field in which the person achieved significance.
- The property embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic value, or represents a significant and distinguishable entity whose components lack individual distinction.
- The property has yielded, or is likely to yield, information important to prehistory or history.

In addition to meeting at least one of these four criteria, listed properties must also retain sufficient physical integrity of those features necessary to convey historic significance. The register has identified the following seven aspects of integrity: (1) location, (2) design, (3) setting, (4) materials, (5) workmanship, (6) feeling, and (7) association.

Properties are nominated to the NRHP by the State Historic Preservation Officer of the state where the property is located, by the federal preservation officer for properties under federal ownership or control, or by the tribal preservation officer if on tribal lands. Listing in the NRHP provides formal recognition of a property's historic, architectural, or archaeological significance based on national standards. Once a property is listed in the NRHP, it becomes searchable in the NRHP database. Documentation of a property's historic significance helps encourage preservation of the resource.

### State Regulations

#### California Register of Historical Resources

The California Office of Historic Preservation maintains the CRHR. The CRHR is the authoritative guide to the state's significant historic and archaeological resources. The program provides for the identification, evaluation, registration, and protection of California's historic resources. The CRHR encourages public recognition and protection of resources of architectural, historic, archaeological, and cultural significance; identifies historic resources for state and local planning purposes; determines eligibility for state historic preservation grant funding; and affords certain protection to resources under CEQA.

The CRHR has established four criteria to be used when evaluating the eligibility of a property or resource for listing:

- 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.
- It is associated with the lives of persons important to local, California, or national history.
- It 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.

- It has yielded, or is likely to yield, information important to prehistory or history of the local area, California, or the nation.

Similar to the NRHP, eligibility for the CRHR requires establishment of physical integrity, including the seven aspects previously described. The CRHR's list of special considerations is less stringent than the NRHP's list, providing allowances for relocated buildings, structures, or objectives as reduced requirements for physical integrity.

### California Environmental Quality Act

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 that 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 the following:

1. A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code 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 a “historic resource” under CEQA Guidelines, Section 15164.5, it must be reviewed under CEQA Statutes, Section 21083.2(g), which 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 California 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 previously mentioned 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 is 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 from the deceased Native American.
  - iii. The most likely descendent (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 California Public Resources Code, Section 5097.98; or
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; or
  - 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, California 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.

### Local Regulations

#### San Diego County 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 for listing resources to the CRHR, but have been modified for local use to include a range of historical resources that specifically reflect the history and prehistory of the County. Only resources that meet the criteria set out below may be listed or formally determined eligible for listing in the local register:

1. The resource is associated with events that have made a significant contribution to the broad patterns of the County's history and cultural heritage

2. The resource is associated with the lives of persons important to the history of the County or its communities
3. The resource embodies the distinctive characteristics of a type, period, County region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values
4. The resource has yielded or may be likely to yield information important in prehistory or history

### San Diego County General Plan – Conservation and Open Space Element

The following goals and policies identified in the County General Plan (2011) Conservation and Open Space Element are applicable to the Proposed 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.
  - 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.

### Otay Ranch Resource Management Plan

The County and the City of Chula Vista adopted the Otay Ranch Phase I RMP in 1993 for the entirety of the approximately 23,000-acre Otay Ranch to function as the equivalent protective measure to the County Resource Protection Ordinance. The Otay Ranch Phase I RMP provides objectives and policies that guide its implementation. The Otay Ranch Phase I RMP also identified an 11,375-acre Preserve to protect and enhance the multiple resources present within Otay Ranch based on the information available at the time of its adoption. The Otay Ranch Phase I RMP acknowledged that the subsequent Otay Ranch Phase II RMP would include additional studies and research that would ultimately refine the preserve boundary (City of Chula Vista and County of San Diego 2015). The Otay Ranch Phase II RMP was adopted by the City of Chula Vista, and elements were adopted by the County. The Otay Ranch Phase II RMP is currently being jointly updated to reflect the latest development activities and address changes to restoration and conservation programs. The County's Resource Protection Ordinance is implemented on a project-by-project basis, but the Otay Ranch RMP provides a guiding document for the long-term, phased construction of Otay Ranch and is implemented on a continual basis. All Otay Ranch projects are specifically exempted from the County's Resource Protection Ordinance (Article V, Section 9) if they are consistent with the Otay Ranch RMP.

Phase I of the Otay Ranch RMP requires identification of sensitive biological, cultural, paleontological, and scenic resources within Otay Ranch and identification of a preserve to protect the most-sensitive resources. The Phase I of the Otay Ranch RMP also establishes objective, policies, and guidelines for the preservation of said resources. Phase 2 of the Otay Ranch RMP is more direct, requiring resource-specific studies to implement the policies of Phase I of the Otay Ranch RMP (City of Chula Vista and County of San Diego 2015).

Policies 1.3 and 2.12, as described below, of the Otay Ranch Phase I RMP refer specifically to cultural resources:

**Policy 1.3** (A/B/C) requires cultural resource surveys under the following guidelines (City of Chula Vista and County of San Diego 2015):

1. Survey of the remaining unsurveyed area within each parcel shall be completed at the site of the first SPA [Sectional Planning Area] approval.
2. Following completion of the systematic survey, sites recommended for testing within SPAs shall be tested on a SPA-by-SPA basis for their importance pursuant to CEQA.
3. The testing program shall be conducted in accordance with County of San Diego Guidelines on a SPA-by-SPA basis.

**Policy 2.12** in the Otay Ranch RMP requires preservation of significant cultural resources. Potential impacts to sites that meet the significance definition under the County's Resource Protection Ordinance must be assessed and mitigation measures should be implemented. Avoidance is the preferred mitigation, but capping, landscaping, or other measures may be used, as appropriate. For sites that do not meet the Resource Protection Ordinance significance threshold, but are significant under CEQA, data recovery and salvage may be appropriate.

### County of San Diego Grading Ordinance

The County 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 the California Health and Safety Code, Section 7050.5, and California 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 area has been to evaluate the likelihood that these classes of items are present in areas that would be affected by the Proposed Project.

Potentially relevant to prehistoric archaeological sites is the category termed traditional cultural properties (TCP) in discussions of cultural resource management 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. Therefore, the traditional cultural significance of a historic property is derived from the role the property plays in a community’s historically rooted beliefs, customs, and practices.

The County Guidelines state that cultural resources can also include TCPs, such as gathering areas, landmarks, and ethnographic locations, in addition to archaeological districts (County of San Diego 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 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, a TCR incorporates consideration of local and state significance and required mitigation under CEQA. A TCR may be significant if it is included in a local or state register of historical resources; determined by the lead agency to be significant pursuant to criteria set forth in the California Public Resources Code, Section 5024.1; considered a geographically defined cultural landscape that meets one or more of these criteria; considered a historical resource described in California Public Resources Code, Section 21084.1; considered a unique archaeological resources described in California Public Resources Code, Section 21083.2; or considered a non-unique archaeological resource if it conforms with the above criteria.

In 1990, the National Park Service and Advisory Council for Historic Preservation introduced the term “TCP” through National Register Bulletin 38 (Parker and King 1998). A TCP may be 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, p. 1). Strictly speaking, TCPs 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, p. 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 to only be important to community members and not to the general outside population as a whole. In this way, a TCP boundary, as described by National Register Bulletin 38 (Parker and King 1998), 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.

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

According to Appendix G of the CEQA Guidelines (14 CCR 15064.5b), a project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment. CEQA defines a substantial adverse change as follows:

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

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

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

Section 15064.5(c) of the CEQA Guidelines applies to effects on archaeological sites and contains the following additional provisions regarding archaeological sites:

- When a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource, as defined in subsection (a).
- If a lead agency determines that the archaeological site is an historical resource, it shall refer to the provisions of Section 21084.1 of the Public Resources Code, and this section, Section 15126.4 of the Guidelines, and the limits contained in Section 21083.2 of the Public Resources Code do not apply.
- If an archaeological site does not meet the criteria defined in subsection (a), but does meet the definition of a unique archaeological resource in Section 21083.2 of the Public Resources Code, the site shall be treated in accordance with the provisions of section 21083.2. The time and cost limitations described in Public Resources Code Section 21083.2 (c–f) do not apply to surveys and site evaluation activities intended to determine whether the project location contains unique archaeological resources.
- If an archaeological resource is neither a unique archaeological nor an historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment. It shall be sufficient that both the resource and the effect on it are noted in the Initial Study or EIR, if one is prepared to address impacts on other resources, but they need not be considered further in the CEQA process.

Sections 15064.5(d) and 15064.5(e) of the CEQA Guidelines contain additional provisions regarding human remains. Regarding Native American human remains, Section 15064.5(d) states the following:

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

- The general prohibition on disinterring, disturbing, or removing human remains from any location other than a dedicated cemetery (Health and Safety Code Section 7050.5); and the requirements of CEQA and the Coastal Act.

### Guidelines for the Determination of Significance

According to the County's Guidelines for Determining Significance – Cultural Resources (County of San Diego 2007, pp. 21–22), any of the following would be a potentially significant impact to cultural resources:

1. The Project, as designed, causes a substantial adverse change in the significance of a historic 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.
2. The project causes a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the State CEQA Guidelines. This shall include the destruction or disturbance of an important archaeological site or any portion of an important archaeological site that contains or has the potential to contain information important to history or prehistory.
3. The project 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 that is important to local tribal communities. [See Section 2.11 of this EIR.]
4. The project disturbs any human remains, including those interred outside of formal cemeteries.

Guidelines 1 and 2 are derived directly from CEQA. Sections 21083.2 of CEQA and 15064.5 of the CEQA Guidelines recommend evaluating historical and archaeological resources to determine whether or not a proposed action would have a significant effect on unique historical or archaeological resources. Guideline 4 is included because human remains must be treated with dignity and respect, and CEQA requires consultation with the MLD as identified by the NAHC for any project in which human remains have been identified.

All discretionary projects are required to conform to applicable County standards related to cultural resources. These include the Otay Ranch General Development Plan/Subregional Plan and requirements listed in the Zoning Ordinance; General Plan; and the Grading, Clearing and Watercourses Ordinance (Section 87.429). Non-compliance would result in a project that is inconsistent with County standards, which is itself a significant impact under CEQA.

#### **2.5.2.1 Historical Resources**

No evidence of historical resources (e.g., structure, features) was discovered during the records search or field survey. Therefore, implementation of the Proposed Project would have **no impact** on historical resources.

### 2.5.2.2 Archaeological Resources

The analysis below evaluates the Proposed Project's potential impacts to archaeological sites within the Project Area. Prehistoric site types identified during the field survey and evaluation include habitation sites, temporary camps, bedrock milling, lithic scatters, and quarries. Historic-period site types include rock features, structures and/or foundations, refuse scatters, and sites with combinations of these components. Numerous multicomponent sites are also present that contain both historic- and prehistoric-period elements.

#### Construction

The Proposed Project development could adversely affect archaeological resources through ground-disturbing activities, such as excavation and grading, which have the potential to damage or destroy known and unknown cultural resources that may be present on or below the ground surface, particularly in undeveloped areas.

A total of 34 extant resources are present outside the ADI. None of these resources would be impacted by Proposed Project implementation and would be conserved within the Otay Ranch RMP/MSCP Preserve. Avoided resources within 50 feet of the ADI would be protected during construction (see Mitigation Measure (M) **CR-1** in Section 2.5.5, Mitigation). Therefore, impacts would be less than significant with implementation of **M-CR-1 (Impact CR-1)**.

Of the 57 archaeological resources (44 sites, 11 isolates; 2 historic structures; including portions of sites) evaluated during the current investigation within the Proposed Project ADI, 55 of the evaluated archaeological sites are not significant under CEQA or the Otay Ranch RMP, and none of the 55 sites are eligible for listing in the CRHR or local register (County of San Diego 2007) (Table 2.5-4). However, under County Guidelines, all archaeological sites are important. The importance of the sites is mitigated through the application of measures that include curation or repatriation of all collected artifacts and documentation, construction monitoring, and erection of temporary fencing around non-impacted portions of the 13 sites (CA-SDI-6695B West, CA-SDI-8086C West, CA-SDI-11397 West, CA-SDI-12332 West, CA-SDI-12333 West, CA-SDI-12373, CA-SDI-12377 West, CA-SDI-12384 East, CA-SDI-12397 West, CA-SDI-21911 North, CA-SDI-21912 North, and CA-SDI-21916), which are partially located in the Otay Ranch RMP/MSCP Preserve to prevent direct and indirect impacts during Proposed Project construction, and temporary fencing along the ADI limits where sites are within 50 feet of the ADI (CA-SDI-12323, CA-SDI-12326, CA-SDI-12393, CA-SDI-12394, and CA-SDI-12395) (**M-CR-1** through **M-CR-2**). The artifacts collected during the current testing program would be curated at the San Diego Archaeological Center or a culturally affiliated tribal curation facility, or alternatively may be repatriated to a culturally affiliated tribe. Implementation of mitigation measures **M-CR-1** and **M-CR-2** would reduce impacts to these sites to **less than significant**

(**Impact CR-2**). For a detailed summary of **M-CR-1** through **M-CR-2** and the cultural sites for which they are applied, refer to Table 2.5-5, Resource Mitigation Measures.

Consistent with the preservation-in-place provisions of CEQA Guidelines, Section 15125.4(b)(3), the Proposed Project is unable to avoid all of the significant archaeological deposits located at CA-SDI-12397 through redesigning the Proposed Project (preservation-in-place option 1), incorporating the site into a park or greenspace (preservation-in-place option 2), capping the site with chemically sterile soil (preservation-in-place option 3), or deeding the site into a conservation easement (preservation-in-place option 4). Preservation in place of all significant deposits at this site is not feasible because the site is located within an area that is identified for improvements to Proctor Valley Road, a major traffic circulation element, which precludes complete avoidance, incorporation of greenspace or parks, or capping. Moreover, the road design is restricted by other Proposed Project–related constraints and cannot be redesigned to avoid impacts to the significant portion of the site. Impacts to the significant portion of the site can be mitigated in the form of a data recovery excavation (**M-CR-3**). Because this site is also important under County Guidelines, this mitigation, in conjunction with **M-CR-1** and **M-CR-2**, would reduce impacts to this site to **less than significant (Impact CR-3)**. The remaining significant portions of CA-SDI-12397 are avoided and already included in the Otay Ranch RMP/MSCP Preserve (preservation-in-place option 2). Additionally, there is still the potential for the discovery of unknown archaeological deposits during earth-moving activities, and there is still the potential for significant impacts to cultural deposits, if discovered. This impact would be **potentially significant**. Implementation of mitigation measures **M-CR-1** and **M-CR-2** would reduce impacts to these sites to **less than significant (Impact CR-4)**. Refer to Table 2.5-4 for a detailed summary of mitigation measures.

Implementation of the Preserve Trails Option, as described in Chapter 1, Project Description, Location, and Environmental Setting, could potentially impact site CA-SDI-12373. Site CA-SDI-12373, which was determined to be significant, is located in the trail easement. No ground disturbance or other construction activities would occur at this location; therefore, there would be no direct impacts to the site. Increased pedestrian/public access to the site may increase the potential for looting at the site, which would be a potential indirect impact to the site (**Impact CR-5**). If the trail easement is selected, a data recovery program consisting of a surface collection of artifacts would be implemented prior to construction (**M-CR-3**). The surface collection would reduce the potential for looting at the site; therefore, the potential for impacts to the site is **less than significant**.

### Operation

Once in operation, the Proposed Project would not involve additional ground-disturbing activities that could impact potential archaeological resources. Therefore, impacts during operation would be **less than significant**.

### 2.5.2.3 *Human Remains*

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 Area was used by Native Americans for religious, ritual, or other special activities; therefore, **no impacts** to Native American burial sites are expected.

### 2.5.3 **Cumulative Impact Analysis**

According to CEQA, the importance of cultural resources comes from the research value and the information they contain. Therefore, the issue that must be explored in a cumulative analysis is the cumulative loss of that information. For sites that are less than significant, the information is preserved through recordation and test excavations. Significant sites that are placed in open space easements avoid impacts to cultural resources and 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 and SCIC. The artifact collections from any potentially significant site would also be curated at a facility within the County or with an affiliated tribal curation facility. Alternatively, the collections may be repatriated to a tribe of appropriate affiliation.

Cumulative impacts to cultural resources are the result of the aggregate effect of land use development or use associated with changes to the landscape since the historic settlement of the area in the 1800s. Changes in land use over the past 150 years in the southwestern area of the County have been driven by water and desirable land forms. Agriculture was focused first on the coastal plain and river valleys and then gradually into the coastal mesas and foothills. In the vicinity of the Project Area, the agribusiness that flourished at Otay Ranch in the twentieth century greatly affected cultural resources through cultivation and grazing. Archaeological sites most affected by agricultural use are smaller, superficial sites that could be easily dispersed or plowed under by seasonal planting and harvesting.

Pressures from residential and commercial development began primarily after 1960. With the sale of Otay Ranch from United Enterprises Inc. to the Baldwin Brothers Inc., a large development company, in 1988, the potential for substantial land use change was established. Development of Otay Ranch, Rolling Hills Ranch (formerly known as Salt Creek Ranch), Eastlake, and Bella Lago have changed hundreds of acres of farm and grazing land to housing tracts and commercial property. Impacts to cultural resources generated by this development were assessed based on a review of the EIRs prepared for each project.

Cultural resources studies conducted for the Otay Ranch PEIR included records searches for the entire approximately 23,000-acre property and more intensive field surveys of approximately

6,000 acres planned to experience intensive development. A total of 213 prehistoric sites, 49 historic sites, and 30 multicomponent sites were recorded on Otay Ranch. The cumulative impact analysis in the Otay Ranch PEIR identified 469 cultural resources sites based on a review of 25 cumulative project EIRs. The Otay Ranch PEIR found that cumulative impacts for the region would reduce cultural resources by approximately 86%, 61% of which Otay Ranch would be responsible for (Otay Ranch Joint Planning Project 1992).

Rolling Hills Ranch, Eastlake, and Bella Lago were cumulatively found to result in impacts to 23 cultural resource sites; however, all were able to mitigate impacts to less than significant (City of Chula Vista 1982).

Development associated with the Proposed Project would contribute to the cumulative impacts to cultural resources because cultural resources are characterized as nonrenewable resources. Although cumulative impacts are unavoidable, these impacts can be mitigated.

A records search and field survey identified 109 archaeological resources within the study area, 57 of which are located within the Proposed Project's ADI. All resources within the ADI were evaluated, and 55 were found to be not significant under CEQA or the Otay Ranch RMP; however, these resources are important. The Proposed Project's impacts to these cultural resources would be reduced to less than significant through documentation of all the sites and through mitigation measures that include preservation of 34 sites in an open space preserve, temporary fencing to avoid potential indirect impacts to resources within 50 feet of potential disturbance areas (**M-CR-1**), and archaeological monitoring during on- and off-site grading activities by a County-approved archaeologist and a Kumeyaay Native American monitor (**M-CR-2**). Impacts to the significant portion of site CA-SDI-12397 would be reduced to less than significant through **M-CR-1**, **M-CR-2**, and a data recovery excavation (**M-CR-3**). Impacts to any undiscovered or buried potentially significant cultural resources located within the cumulative projects' boundaries would be reduced to below a level of significance through the implementation of the archaeological monitoring program.

Because the Proposed Project and the projects within the cumulative impact area have been examined for their significance of impacts to cultural resources, there would be no cumulative loss of information associated with development in the area. Additionally, if new resources are discovered during development within the cumulative impact area, site-specific measures necessary to evaluate and collect relevant information would occur. The Proposed Project would not cumulatively contribute to a significant impact. Therefore, cumulative impacts would be **less than significant**.

### 2.5.4 Significance of Impacts Prior to Mitigation

Based on the analysis above, the Proposed Project would have the following **potentially significant impacts** prior to mitigation:

**Impact CR-1** The Proposed Project's development activities could affect cultural resources within 50 feet of the ADI or within resource-specific, predetermined buffers.

**Impact CR-2** The Proposed Project has the potential to affect 57 cultural resources that, although they are not recommended as eligible for listing in the CRHR or the local register, are significant under the County CEQA Guidelines.

**Impact-CR-3** The Proposed Project has the potential to affect one cultural resource (CA-SDI-12397 East) that has been determined to be significant under CEQA and County Guidelines and eligible for listing in the CRHR and local register.

**Impact CR-4** The Proposed Project has the potential to affect undiscovered cultural resources that may qualify as significant under the County Guidelines.

**Impact CR-5** If the Preserve Trails Option is selected, the Proposed Project has the potential to indirectly affect one cultural resource (CA-SDI-12373, Locus A) that has been determined to be significant under CEQA and County Guidelines and eligible for listing in the CRHR and local register.

### 2.5.5 Mitigation

The following mitigation measures, if implemented, would reduce the identified significant impacts on cultural resources to less than significant:

**M-CR-1 Temporary Fencing.** To prevent inadvertent disturbance of archaeological sites within the avoidance areas (open space), temporary fencing shall be installed where resources are located within 50 feet of the area of direct impact (ADI). The temporary fencing shall include the following requirements:

- Prior to the commencement of any grading and/or clearing in association with the grading and/or improvement plan, temporary orange construction fencing shall be placed to protect archaeological sites from inadvertent disturbance within the avoidance areas (open space) and the unimpacted portions of sites outside of the ADI during earth-disturbing activities. Temporary fencing shall be installed prior to the pre-construction meeting and any clearing, grubbing,

trenching, grading, or land disturbances; remain for the duration of earth-disturbing activities; and include the following:

- Temporary fencing is required in all locations of the Proposed Project where proposed grading or clearing is within 50 feet of any archaeological site within avoidance areas (open space) or the unaffected portions of sites outside of the ADI.
- The placement of such fencing shall be approved by the County of San Diego (County). Upon approval, the fencing shall remain in place until the conclusion of grading activities, after which the fencing shall be removed.

**M-CR-2** In total, 57 sites are located within the area of direct impact (ADI) and would be impacted during development of the Proposed Project (**Impact CR-2**). There is also the potential for the discovery of unknown cultural resources during ground-disturbing activities associated with construction of the Proposed Project (**Impact CR-4**). The mitigation measures described below would reduce potentially significant impacts to less than significant:

**Archaeological Monitoring.** To mitigate for potential impacts to undiscovered, buried archaeological resources in the Project Area, an archaeological monitoring program and potential data recovery program shall be implemented pursuant to the County of San Diego's (County's) Guidelines for Determining Significance and Report Format and Requirements for Cultural Resources and the California Environmental Quality Act (CEQA) and shall include the following requirements:

a. Pre-Construction

- The applicant shall contract with a County-approved archaeologist to perform archaeological monitoring. The project archaeologist shall contract with a Kumeyaay monitor to conduct Native American monitoring for the Proposed Project.
- The pre-construction meeting shall be attended by the project archaeologist and the Kumeyaay Native American monitor.

b. Construction

- **Monitoring.** Both the project archaeologist and Kumeyaay Native American monitor are to be on site during all earth-disturbing activities. The frequency and location of monitoring of native soils shall be determined by the project archaeologist and the Kumeyaay Native American monitor. The project archaeologist and the Kumeyaay Native

American monitor shall evaluate fill soils to ensure that they are negative for cultural resources.

- Inadvertent Discoveries
  - The project archaeologist and the Kumeyaay 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 the Kumeyaay Native American monitor, shall determine the significance of discovered resources.
  - Construction activities shall be allowed to resume after the County archaeologist has agreed with the significance evaluation.
  - Isolates and non-significant deposits shall be minimally documented in the field. If the isolates and non-significant deposits are not be collected by the project archaeologist, the Kumeyaay 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 Kumeyaay Native American monitor and approved by the County archaeologist. The program shall include reasonable efforts to preserve (avoid) unique cultural resources of sacred sites, to cap identified sacred sites or unique cultural resources and to place development over the cap if avoidance is infeasible; and to perform data recovery for non-unique cultural resources. The preferred option is preservation (avoidance).

c. Human Remains

- The property owner or their representative shall contact the County coroner and the County Planning & Development Services 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 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 California Public Resources Code, Section 5097.98, has been conducted.
- California Public Resources Code, Section 5097.98; CEQA Guidelines, Section 15064.5; and California Health and Safety Code, Section 7050.5, shall be followed in the event that human remains are discovered.

d. Rough Grading

- Upon completion of rough grading, a monitoring report identifying whether resources were encountered shall be prepared. A copy of the monitoring report shall be provided to any culturally affiliated tribe that requests a copy.

e. Final Grading

- A final report substantiating that earth-disturbing activities are completed and whether cultural resources were encountered shall be prepared. A copy of the final report shall be submitted to the South Coastal Information Center (SCIC) and any culturally affiliated tribe that requests a copy.

f. Disposition of Cultural Material

The final report shall include the following:

- Evidence that all prehistoric materials have been curated at a San Diego curation facility or tribal curation facility that meets federal standards according to Title 36, Part 79, of the Code of Federal Regulations or alternatively have been repatriated to a culturally affiliated tribe.
- Evidence that historic materials have been curated at a San Diego curation facility that meets federal standards according to Title 36, Part 79, of the Code of Federal Regulations.

**M-CR-3**

**Data Recovery.** To mitigate potential impacts to the eastern portion of sites CA-SDI-12397 and CA-SDI-12373, a phased data recovery program shall be implemented prior to construction by a County of San Diego (County)-approved archaeologist. The phased data recovery (prepared as a separate document) would involve either surface collection and curation/repatriation to prevent looting (CA-SDI-12373 (Locus A), or excavation of a series of shovel test pits (STPs) to identify subsurface deposits and then excavation of control units (CUs) within

those areas where subsurface deposits are identified. The number of CUs to be excavated would depend on the quantity and variety of artifacts and features identified and the presence/absence of a midden deposit because the data potential of the site is contained within those components of the site. Archaeological materials recovered during the data recovery efforts shall be cleaned, sorted, cataloged, and analyzed following standard archaeological procedures and shall be documented in a data recovery report. Upon completion of fieldwork, the County-approved archaeologist shall submit a letter report summarizing the field work efforts and stating that the scientifically significant sample of the site has been recovered. Upon approval from the County archaeologist, construction may begin at this location.

### 2.5.6 Conclusion

Cultural resources located within the Project Area but outside of the ADI would be avoided and conserved in the Otay Ranch RMP/MSCP Preserve. Temporary fencing and establishment of environmentally sensitive area buffers around sites located within 50 feet of potential disturbance areas (**M-CR-1**) would reduce potential impacts to **less than significant**. Temporary fencing around unimpacted portions of the sites that are partially located in the Preserve lands would prevent direct and indirect impacts during Proposed Project activities, reducing potential impacts to **less than significant**.

The importance of the sites would be mitigated through the inclusion of archaeological monitoring by a County-approved archaeologist and a Kumeyaay Native American monitor during on- and off-site grading activities (**M-CR-2**). Monitoring would also mitigate potential impacts to unknown cultural resources to **less than significant**.

The eastern portion of site CA-SDI-12397 is significant under CEQA and County Guidelines, and therefore, impacts to the site would also be significant. Similarly, site CA-SDI-12373 (Locus A) is significant under CEQA and County Guidelines, and therefore, impacts to this site would also be significant. The impacts would be reduced to **less than significant** through implementation of a data recovery excavation (**M-CR-3**). As shown in Table 2.5-3, Cultural Resources Recorded Outside the APE, implementation of the mitigation measures would reduce impacts to cultural sites to **less than significant**.

**Table 2.5-1  
Evaluated Resources within the ADI**

Primary	Trinomial	Period	Dimensions (meters)
P-37-006695	CA-SDI-6695A <sup>a</sup>	Multicomponent	600 x 500
	CA-SDI-6695B East <sup>a,b</sup>	Prehistoric	200 x 75
P-37-008086	CA-SDI-8086C (East; previously P-37-026524) <sup>c</sup>	Multicomponent	N/A
	CA-SDI-8086C (West; previously Temp-17) <sup>c, d</sup>	Multicomponent	100 x 90
P-37-011394	CA-SDI-11394	Prehistoric	100 x 100
P-37-011396	CA-SDI-11396	Multicomponent	200 x 200
P-37-011397	CA-SDI-11397 East	Prehistoric	30 x 30
P-37-011399	CA-SDI-11399	Multicomponent	175 x 150
P-37-011401	CA-SDI-11401	Prehistoric	10 x 10
P-37-011417	CA-SDI-11417/CA-SDI12378	Multicomponent	75 x 200
P-37-011421	CA-SDI-11421	Historic	20 x 20
P-37-012313	CA-SDI-12313	P. Isolate	10 x 5
P-37-012314	CA-SDI-12314	Prehistoric	50 x 50
P-37-012315	CA-SDI-12315	Prehistoric	60 x 30
P-37-012316	CA-SDI-12316	Prehistoric	15 x 5
P-37-012317	CA-SDI-12317	Prehistoric	300 x 50
P-37-012318	CA-SDI-12318	Historic	5 x 5
P-37-012319	CA-SDI-12319	Prehistoric	15 x 10
P-37-012320	CA-SDI-12320	Prehistoric	300 x 150
P-37-012322	CA-SDI-12322	Prehistoric	8 x 5
P-37-012324	CA-SDI-12324	P. Isolate	25 x 25
P-37-012328	CA-SDI-12328	Multicomponent	100 x 100
P-37-012329	CA-SDI-12329	Prehistoric	30 x 20
P-37-012330	CA-SDI-12330	Prehistoric	10 x 10
P-37-012332 <sup>b</sup>	CA-SDI-12332	Prehistoric	120 x 100
P-37-012333	CA-SDI-12333	Prehistoric	10 x 10
P-37-012335	CA-SDI-12335	Prehistoric	10 x 10
P-37-012373	CA-SDI-12373	Multicomponent	75 x 200
P-37-012377 <sup>b</sup>	CA-SDI-12377 East	Prehistoric	150 x 600
P-37-012379	CA-SDI-12379	Prehistoric	40 x 80
P-37-012380	CA-SDI-12380	Prehistoric	100 x 60
P-37-012381	CA-SDI-12381	Prehistoric	15 x 5
P-37-012382	CA-SDI-12382	Multicomponent	40 x 150
P-37-012383	CA-SDI-12383	Prehistoric	20 x 120
P-37-012384	CA-SDI-12384	Prehistoric	70 x 100
P-37-012385	CA-SDI-12385	Prehistoric	30 x 50
P-37-012391	CA-SDI-12391	Prehistoric	40 x 20
P-37-012392 <sup>b</sup>	CA-SDI-12392	Prehistoric	40 x 40

**Table 2.5-1  
Evaluated Resources within the ADI**

Primary	Trinomial	Period	Dimensions (meters)
P-37-012396 <sup>b</sup>	CA-SDI-12396	Historic	300 x 20
P-37-012397 <sup>b</sup>	CA-SDI-12397 East	Prehistoric	150 x 150
P-37-014834	N/A	P. Isolate	N/A
P-37-015033	N/A	P. Isolate	N/A
P-37-015035	N/A	P. Isolate	N/A
P-37-015036	N/A	P. Isolate	N/A
P-37-015038	N/A	P. Isolate	N/A
P-37-015040	CA-SDI-21924	Prehistoric	N/A
P-37-015041	N/A	P. Isolate	N/A
P-37-015042	N/A	P. Isolate	N/A
P-37-015043	CA-SDI-21925	Prehistoric	N/A
P-36-015059	N/A	P. Isolate	N/A
P-37-015060	N/A	P. Isolate	N/A
P-37-026522	N/A	Historic	N/A
P-37-026526	N/A	Historic	N/A
P-37-034768 (Temp-7)	CA-SDI-21630	Prehistoric	10 x 10
P-37-034770 (Temp 12)	CA-SDI-21632	Prehistoric	15 x 15
P-37-034771 (Temp 18)	CA-SDI-21633	Prehistoric	5 x 5
P-37-035970 (Temp 9)	CA-SDI-21911	Prehistoric	23 x 21
P-37-035971 (Temp 10)	CA-SDI-21912	Prehistoric	32 x 20
P-37-035975 (Temp-15)	CA-SDI-21916	Prehistoric	65 x 45

N/A = not applicable

<sup>a</sup> The loci (A and B) of CA-SDI-6695 are listed and discussed separately, but they are constituents of the same resource.

<sup>b</sup> Resource partially overlaps the ADI of the Proposed Project; full evaluation results are contained in Appendix 2.5-1.

<sup>c</sup> The loci (A, B, and C) of CA-SDI-8086 are listed and discussed in the same manner as CA-SDI-6695.

<sup>d</sup> Temp-17 from the inventory phase has been combined with P-37-026524 as CA-SDI-8086C.

**Table 2.5-2  
Cultural Resources Identified in the APE but Outside the ADI**

Primary	Trinomial	Period	Type	Dimensions (meters)	Relocated?
<i>Previously Recorded Resources</i>					
P-37-06965	CA-SDI-6965	Historic	Historic habitation	300 x 250	Yes
P-37-08086 <sup>a</sup>	CA-SDI-8086A	Prehistoric	Lithic scatter	7 x 7	Yes
	CA-SDI-8086B	Prehistoric	Temporary camp	60 x 40	Yes
P-37-11395	CA-SDI-11395	Prehistoric	Lithic scatter	N/A	Yes
P-37-11398	CA-SDI-11398	Multicomponent	Lithic scatter; historic foundation and features	5 x 5	Yes
P-37-11411	CA-SDI-11411	Multicomponent	Bedrock milling; historic refuse	20 x 20	No

**Table 2.5-2  
Cultural Resources Identified in the APE but Outside the ADI**

Primary	Trinomial	Period	Type	Dimensions (meters)	Relocated?
P-37-11418	CA-SDI-11418	Historic	Historic camp	N/A	Yes
P-37-11422	CA-SDI-11422	Historic	Historic structure and refuse	N/A	Yes
P-37-12321	CA-SDI-12321	Prehistoric	Sparse lithic scatter	45 × 20	Yes
P-37-12323	CA-SDI-12323	Historic	Historic rock feature	20 × 10	Yes
P-37-12326	CA-SDI-12326	Prehistoric	Lithic scatter	20 × 20	Yes
P-37-12331	CA-SDI-12331	Prehistoric	Bedrock milling; lithic scatter	250 × 75	Yes
P-37-12334	CA-SDI-12334	Prehistoric	Habitation site	75 × 40	Yes
P-37-12374	CA-SDI-12374	Prehistoric	Quarry	20 × 20	No
P-37-12375	CA-SDI-12375	Prehistoric	Lithic scatter	120 × 40	Yes
P-37-12376	CA-SDI-12376	Historic	Historic cairn	1 × 1	Yes
P-37-12386	CA-SDI-12386	Prehistoric	Lithic scatter	100 × 75	No
P-37-12387	CA-SDI-12387	Prehistoric	Lithic scatter	20 × 20	No
P-37-12388	CA-SDI-12388	Prehistoric	Lithic scatter	20 × 10	No
P-37-12389	CA-SDI-12389	Prehistoric	Bedrock milling	150 × 50	Yes
P-37-12390	CA-SDI-12390	Prehistoric	Lithic scatter	120 × 50	No
P-37-12393	CA-SDI-12393	Multicomponent	Lithic scatter; historic rock feature	N/A	Yes
P-37-12394	CA-SDI-12394	Prehistoric	Bedrock milling	N/A	No
P-37-12395	CA-SDI-12395	Historic	Historic refuse and rock feature	N/A	No
P-37-12398	CA-SDI-12398	Prehistoric	Lithic scatter; milling; quarry	N/A	Yes
P-37-12635	CA-SDI-12635	Prehistoric	Lithic scatter	N/A	No
P-37-12937	CA-SDI-12937	Prehistoric	Habitation site; milling; artifacts	N/A	Yes
P-37-015037	None	Prehistoric	Isolate	N/A	No
P-37-015039	None	Prehistoric	Isolate	N/A	No
P-37-015053	None	Prehistoric	Isolate	N/A	No
P-37-015055	None	Prehistoric	Isolate	N/A	No
P-37-015056	None	Prehistoric	Isolate	N/A	No
P-37-015057	None	Prehistoric	Isolate	N/A	No
P-37-015058	None	Prehistoric	Isolate	N/A	No
P-37-026525	None	Historic	Historic structure	N/A	No
<i>Newly Recorded Resources</i>					
P-37-034767	CA-SDI-21628	Prehistoric	Lithic scatter	20 × 15	N/A
P-37-034769	CA-SDI-21631	Prehistoric	Lithic scatter	15 × 15	N/A
P-37-035972	CA-SDI-21913	Historic	Foundation; trough; pipe	20 × 10	N/A

**Table 2.5-2**  
**Cultural Resources Identified in the APE but Outside the ADI**

Primary	Trinomial	Period	Type	Dimensions (meters)	Relocated?
P-37-035973	CA-SDI-21914	Prehistoric	Bedrock milling	20 × 15	N/A
P-37-035974	CA-SDI-21915	Multicomponent	Foundation; trough; temporary camp	60 × 40	N/A
P-37-035976	CA-SDI-21917	Prehistoric	Lithic scatter	33 × 20	N/A

ADI = area of direct impact; APE = area of potential effects; N/A = not applicable

<sup>a</sup> Loci A and B of CA-SDI-8086 are listed here as outside the ADI; however, since Locus C is partially in the ADI, the site is located in the ADI.

**Table 2.5-3**  
**Cultural Resources Recorded Outside the APE**

Primary	Trinomial	Period	Type	Dimensions (meters)	Relocated?
<i>Previously Recorded Resources</i>					
P-37-6694	CA-SDI-6694	Prehistoric	Lithic scatter	20 × 20	Yes
P-37-11392	CA-SDI-11392	Multicomponent	Adobe structure; rock features; water tank; lithic scatter	30 × 30	Yes
P-37-11400	CA-SDI-11400	Prehistoric	Lithic scatter	5 × 5	Yes
P-37-11416	CA-SDI-11416	Historic	Stone wall	2 × 2	Yes
P-37-12325	CA-SDI-12325	Prehistoric	Habitation	250 × 150	Yes
P-37-12327	CA-SDI-12327	Prehistoric	N/A	N/A	No
P-37-026523	None	Historic	Historic structure	50 × 50	No
P-37-026532	None	Historic	Historic structure	25 × 20	No
<i>Newly Recorded Resources</i>					
P-37-034762	CA-SDI-21624	Prehistoric	Quarry/lithic scatter	25 × 15	N/A
P-37-034763	CA-SDI-21625	Prehistoric	Quarry/lithic scatter	65 × 30	N/A
P-37-034764	CA-SDI-21626	Prehistoric	Lithic scatter	20 × 20	N/A
P-37-034765	CA-SDI-21627	Prehistoric	Lithic scatter	20 × 20	N/A
P-37-034767	CA-SDI-21629	Historic	Rock feature and refuse scatter	10 × 10	N/A

APE = area of potential effect; N/A = not applicable

**Table 2.5-4  
Management Summary**

Site Number	Period	Significance/ Eligibility Status	Impact	Recommendations/ Mitigation Measures	Impact Significance After Mitigation
<i>Resources Completely or Partially Intersecting ADI</i>					
CA-SDI-6695A	Multicomponent	County: Important; CEQA: Not significant; CRHR: Not eligible; Otay Ranch RMP: Not significant; Local Register: Not eligible	Significant	Evaluation, research, collection, curation or repatriation, monitoring	Less than Significant
CA-SDI-6695B East	Prehistoric	County: Important; CEQA: Not significant; CRHR: Not eligible; Otay Ranch RMP: Not significant; Local Register: Not eligible	Significant	Evaluation, research, collection, curation or repatriation, monitoring	Less than Significant
CA-SDI-6695B West	Prehistoric	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation or repatriation, monitoring, temporary fencing	Less than Significant
CA-SDI-8086A	Prehistoric	County: Important; CEQA: Significant; CRHR: Eligible; Otay Ranch RMP; Significant; Local Register: Eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation or repatriation, monitoring	Less than significant
CA-SDI-8086B	Prehistoric	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation or repatriation, monitoring	Less than Significant
CA-SDI-8086C East (including P-37-026524)	Multicomponent	County: Important; CEQA: Not significant; CRHR: Not eligible; Otay Ranch RMP: Not significant; Local Register: Not eligible	Significant	Evaluation, research, collection, curation or repatriation, monitoring	Less than significant
CA-SDI-8086C West (Including Temp-17)	Multicomponent	County: Important; CEQA: Significant; CRHR: Eligible; Otay Ranch RMP: Significant; Local Register: Significant	Avoided/not significant	Avoidance; evaluation; research, data recovery, collection, curation or repatriation, monitoring, temporary fencing	Less than significant
CA-SDI-11394	Prehistoric	County: Important; CEQA: Not significant; CRHR: Not eligible; Otay Ranch RMP: Not significant; Local Register: Not eligible	Significant	Evaluation, research, collection, curation or repatriation, monitoring	Less than Significant

**Table 2.5-4  
Management Summary**

Site Number	Period	Significance/ Eligibility Status	Impact	Recommendations/ Mitigation Measures	Impact Significance After Mitigation
CA-SDI-11396	Multicomponent	County: Important; CEQA: Not significant; CRHR: Not eligible; Otay Ranch RMP: Not significant; Local Register: Not eligible	Significant	Evaluation, research, collection, curation or repatriation, monitoring	Less than Significant
CA-SDI-11397 East	Prehistoric	County: Important; CEQA: Not significant; CRHR: Not eligible; Otay Ranch RMP: Not significant; Local Register: Not eligible	Significant	Evaluation, research, collection, curation or repatriation, monitoring	Less than Significant
CA-SDI-11397 West	Prehistoric	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring, temporary fencing	Less than Significant
CA-SDI-11399	Multicomponent	County: Important; CEQA: Not significant; CRHR: Not eligible; Otay Ranch RMP: Not significant; Local Register: Not eligible	Significant	Evaluation, research, collection or repatriation, curation, monitoring	Less than Significant
CA-SDI-11401	Prehistoric	Not relocated	Not significant	N/A	Not significant
CA-SDI-11417/12378	Multicomponent	County: Important; CEQA: Not significant; CRHR: Not eligible; Otay Ranch RMP: Not significant; Local Register: Not eligible	Significant	Evaluation, research, collection, curation or repatriation, monitoring	Less than Significant
CA-SDI-11421	Historic	Not relocated	Not significant	N/A	Not significant
CA-SDI-12313/P-37-012313	Prehistoric Isolate	County: Not important; CEQA: Not significant; CRHR: Not eligible; Otay Ranch RMP: Not significant; Local Register: Not eligible	Not significant	N/A	Not Significant
CA-SDI-12314	Prehistoric	County: Important; CEQA: Not significant; CRHR: Not eligible; Otay Ranch RMP: Not significant; Local Register: Not eligible	Significant	Evaluation, research, collection, curation or repatriation, monitoring	Less than Significant

**Table 2.5-4  
Management Summary**

Site Number	Period	Significance/ Eligibility Status	Impact	Recommendations/ Mitigation Measures	Impact Significance After Mitigation
CA-SDI-12315	Prehistoric	County: Important; CEQA: Not significant; CRHR: Not eligible; Otay Ranch RMP: Not significant; Local Register: Not eligible	Significant	Evaluation, research, collection, curation or repatriation, monitoring	Less than Significant
CA-SDI-12316	Prehistoric	County: Important; CEQA: Not significant; CRHR: Not eligible; Otay Ranch RMP: Not significant; Local Register: Not eligible	Significant	Evaluation, research, collection, curation or repatriation, monitoring	Less than Significant
CA-SDI-12317	Prehistoric	County: Important; CEQA: Not significant; CRHR: Not eligible; Otay Ranch RMP: Not significant; Local Register: Not eligible	Significant	Evaluation, research, collection, curation or repatriation, monitoring	Less than Significant
CA-SDI-12318	Historic	County: Important; CEQA: Not significant; CRHR: Not eligible; Otay Ranch RMP: Not significant; Local Register: Not eligible	Significant	Evaluation, research, collection, curation, monitoring	Less than Significant
CA-SDI-12319	Prehistoric	Not relocated	Not significant	N/A	Not significant
CA-SDI-12320	Prehistoric	County: Important; CEQA: Not significant; CRHR: Not eligible; Otay Ranch RMP: Not significant; Local Register: Not eligible	Significant	Evaluation, research, collection, curation or repatriation, monitoring	Less than Significant
CA-SDI-12322	Prehistoric	Not relocated	Not significant	N/A	Not significant
CA-SDI-12324/P-37-012324	Prehistoric Isolate	County: Not important; CEQA: Not significant; CRHR: Not eligible; Otay Ranch RMP: Not significant; Local Register: Not eligible	Not significant	N/A	Not Significant
CA-SDI-12328	Multicomponent	County: Important; CEQA: Not significant; CRHR: Not eligible; Otay Ranch RMP: Not significant; Local Register: Not eligible	Significant	Evaluation, research, collection, curation or repatriation, monitoring	Less than Significant

**Table 2.5-4  
Management Summary**

Site Number	Period	Significance/ Eligibility Status	Impact	Recommendations/ Mitigation Measures	Impact Significance After Mitigation
CA-SDI-12329	Prehistoric	County: Important; CEQA: Not significant; CRHR: Not eligible; Otay Ranch RMP: Not significant; Local Register: Not eligible	Significant	Evaluation, research, collection, curation or repatriation, monitoring	Less than Significant
CA-SDI-12330	Prehistoric	County: Important; CEQA: Not significant; CRHR: Not eligible; Otay Ranch RMP: Not significant; Local Register: Not eligible	Significant	Evaluation, research, collection, curation or repatriation, monitoring	Less than Significant
CA-SDI-12332 East	Prehistoric	County: Important; CEQA: Not significant; CRHR: Not eligible; Otay Ranch RMP: Not significant; Local Register: Not eligible	Significant	Evaluation, research, collection, curation or repatriation, monitoring	Less than Significant
CA-SDI-12332 West	Prehistoric	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring, temporary fencing	Less than Significant
CA-SDI-12333 East	Prehistoric	County: Important; CEQA: Not Significant; CRHR: Not Eligible; Otay Ranch RMP: Not Significant; Local Register: Not Eligible	Significant	Evaluation, research, collection, curation or repatriation, monitoring	Less than Significant
CA-SDI-12333 West	Prehistoric	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring, temporary fencing	Less than Significant
CA-SDI-12335	Prehistoric	Not relocated	Not significant	N/A	Not significant
CA-SDI-12373 (Locus A)	Prehistoric	County: Important; CEQA: Significant; CRHR: Eligible; Otay Ranch RMP: Not significant; Local Register: Eligible	Significant	Avoidance – open space, evaluation, research, collection, curation or repatriation, monitoring, data recovery	Less than Significant
CA-SDI-12373 (Locus B)	Historic	County: Important; CEQA: Not significant; CRHR: Not eligible; Otay Ranch RMP: Not significant; Local Register: Not eligible	Not significant	Evaluation, research, collection, curation or repatriation, monitoring	Less than significant

**Table 2.5-4  
Management Summary**

Site Number	Period	Significance/ Eligibility Status	Impact	Recommendations/ Mitigation Measures	Impact Significance After Mitigation
CA-SDI-12377 East	Prehistoric	County: Important; CEQA: Not significant; CRHR: Not eligible; Otay Ranch RMP: Not significant; Local Register: Not eligible	Significant	Evaluation, research, collection, curation or repatriation, monitoring	Less than Significant
CA-SDI-12377 West	Prehistoric	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring, temporary fencing	Less than significant
CA-SDI-12379	Prehistoric	County: Important; CEQA: Not significant; CRHR: Not eligible; Otay Ranch RMP: Not significant; Local Register: Not eligible	Significant	Evaluation, research, collection, curation, monitoring	Less than Significant
CA-SDI-12380	Prehistoric	County: Important; CEQA: Not significant; CRHR: Not eligible; Otay Ranch RMP: Not significant; Local Register: Not eligible	Significant	Evaluation, research, collection, curation, monitoring	Less than Significant
CA-SDI-12381	Prehistoric	County: Important; CEQA: Not significant; CRHR: Not eligible; Otay Ranch RMP: Not significant; Local Register: Not eligible	Significant	Evaluation, research, collection, curation, monitoring	Less than Significant
CA-SDI-12382	Multicomponent	County: Important; CEQA: Not significant; CRHR: Not eligible; Otay Ranch RMP: Not significant; Local Register: Not eligible	Significant	Evaluation, research, collection, curation, monitoring	Less than Significant
CA-SDI-12383	Prehistoric	Not relocated	Not significant	N/A	Not significant
CA-SDI-12384 West	Prehistoric	County: Important; CEQA: Not significant; CRHR: Not eligible; Otay Ranch RMP: Not significant; Local Register: Not eligible	Significant	Evaluation, research, collection, curation or repatriation, monitoring	Less than Significant
CA-SDI-12384 East	Prehistoric	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring, temporary fencing	Less than Significant

**Table 2.5-4  
Management Summary**

Site Number	Period	Significance/ Eligibility Status	Impact	Recommendations/ Mitigation Measures	Impact Significance After Mitigation
CA-SDI-12385	Prehistoric	County: Important; CEQA: Not significant; CRHR: Not eligible; Otay Ranch RMP: Not significant; Local Register: Not eligible	Significant	Evaluation, research, collection, curation or repatriation, monitoring	Less than Significant
CA-SDI-12391	Prehistoric	County: Important; CEQA: Not significant; CRHR: Not eligible; Otay Ranch RMP: Not significant; Local Register: Not eligible	Significant	Evaluation, research, collection, curation or repatriation, monitoring	Less than Significant
CA-SDI-12392	Prehistoric	Not relocated	Not significant	N/A	Not significant
CA-SDI-12396	Historic	County: Important; CEQA: Not significant; CRHR: Not eligible; Otay Ranch RMP: Not significant; Local Register: Not eligible	Significant	Evaluation, research, collection, curation, monitoring	Less than Significant
CA-SDI-12397 East	Prehistoric	County: Important; CEQA: Significant; CRHR: Eligible; Otay Ranch RMP: Not significant; Local Register: Eligible	Significant	Evaluation, research, collection, curation or repatriation, monitoring	Less than significant
CA-SDI-12397 West	Prehistoric	County: Important; CEQA: Not evaluated; CRHR: Not evaluated; Otay Ranch RMP: Not evaluated; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring, temporary fencing	Less than Significant
CA-SDI-21630	Prehistoric	County: Important; CEQA: Not significant; CRHR: Not eligible; Otay Ranch RMP: Not significant; Local Register: Not eligible	Significant	Evaluation, research, collection, curation or repatriation, monitoring	Less than Significant
CA-SDI-21632	Prehistoric	County: Important; CEQA: Not significant; CRHR: Not eligible; Otay Ranch RMP: Not significant; Local Register: Not eligible	Significant	Evaluation, research, collection, curation or repatriation, monitoring	Less than Significant
CA-SDI-21633	Prehistoric	County: Important; CEQA: Not significant; CRHR: Not eligible; Otay Ranch RMP: Not significant; Local Register: Not eligible	Significant	Evaluation, research, collection, curation or repatriation, monitoring	Less than Significant

**Table 2.5-4  
Management Summary**

Site Number	Period	Significance/ Eligibility Status	Impact	Recommendations/ Mitigation Measures	Impact Significance After Mitigation
CA-SDI-21911 South	Prehistoric	County: Important; CEQA: Not significant; CRHR: Not eligible; Otay Ranch RMP: Not significant; Local Register: Not eligible	Significant	Evaluation, research, collection, curation or repatriation, monitoring	Less than Significant
CA-SDI-21911 North	Prehistoric	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring, temporary fencing	Less than Significant
CA-SDI-21912 South	Prehistoric	County: Important; CEQA: Not significant; CRHR: Not eligible; Otay Ranch RMP: Not significant; Local Register: Not eligible	Significant	Evaluation, research, collection, curation or repatriation, monitoring	Less than Significant
CA-SDI-21912 North	Prehistoric	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring, temporary fencing	Less than Significant
CA-SDI-21916 (Trail)	Prehistoric	County: Important; CEQA: Not significant; CRHR: Not eligible; Otay Ranch RMP: Not significant; Local Register: Not eligible	Not significant	Evaluation, research, collection, curation, monitoring	Less than Significant
CA-SDI-21916 (Outside Trail)	Prehistoric	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring	Less than Significant
P-37-014834	Prehistoric Isolate	Isolate	Not significant	N/A	Not significant
P-37-015033	Prehistoric Isolate	Isolate	Not significant	N/A	Not significant
P-37-015035	Prehistoric Isolate	Isolate	Not significant	N/A	Not significant
P-37-015036	Prehistoric Isolate	Isolate	Not significant	N/A	Not significant
P-37-015038	Prehistoric Isolate	Isolate	Not significant	N/A	Not significant

**Table 2.5-4  
Management Summary**

Site Number	Period	Significance/ Eligibility Status	Impact	Recommendations/ Mitigation Measures	Impact Significance After Mitigation
P-37-015040 (CA-SDI-21924)	Prehistoric	County: Important; CEQA: Not significant; CRHR: Not eligible; Otay Ranch RMP: Not significant; Local Register: Not eligible	Significant	Evaluation, research, collection, curation or repatriation, monitoring	Less than Significant
P-37-015041	Prehistoric Isolate	Isolate	Not significant	N/A	Not significant
P-37-015042	Prehistoric Isolate	Isolate	Not significant	N/A	Not significant
P-37-015043 (CA-SDI-21925)	Prehistoric	County: Important; CEQA: Not significant; CRHR: Not eligible; Otay Ranch RMP: Not significant; Local Register: Not eligible	Significant	Evaluation, research, collection, curation or repatriation, monitoring	Less than Significant
P-37-015059	Prehistoric Isolate	Isolate	Not Significant	N/A	Not significant
P-37-015060	Prehistoric Isolate	Isolate	Not significant	N/A	Not significant
P-37-026522	Historic	Not relocated	Not significant	N/A	Not significant
P-37-026526	Historic	Not relocated	Not significant	N/A	Not significant
<i>Resources Outside of Area of Direct Impact (ADI)</i>					
CA-SDI-6694	Prehistoric	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring	Less than Significant
CA-SDI-6965	Historic	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring	Less than Significant
CA-SDI-11392	Multicomponent	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring	Less than Significant

**Table 2.5-4  
Management Summary**

Site Number	Period	Significance/ Eligibility Status	Impact	Recommendations/ Mitigation Measures	Impact Significance After Mitigation
CA-SDI-11395	Prehistoric	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring	Less than Significant
CA-SDI-11398	Multicomponent	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring	Less than Significant
CA-SDI-11400	Prehistoric	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring	Less than Significant
CA-SDI-11411	Multicomponent	Not relocated	Avoided/not significant	N/A	Not significant
CA-SDI-11416	Historic	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring	Less than Significant
CA-SDI-11418	Historic	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring	Less than Significant
CA-SDI-11422	Historic	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring	Less than Significant
CA-SDI-12321	Prehistoric	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring, temporary fencing	Less than Significant

**Table 2.5-4  
Management Summary**

Site Number	Period	Significance/ Eligibility Status	Impact	Recommendations/ Mitigation Measures	Impact Significance After Mitigation
CA-SDI-12323	Historic	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring, temporary fencing	Less than Significant
CA-SDI-12325	Prehistoric	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring	Less than Significant
CA-SDI-12326	Prehistoric	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring	Less than Significant
CA-SDI-12327	Prehistoric	Not relocated	Avoided/not significant	N/A	Not significant
CA-SDI-12331	Prehistoric	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring	Less than Significant
CA-SDI-12334	Prehistoric	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring	Less than Significant
CA-SDI-12374	Prehistoric	Not relocated	Avoided/not significant	N/A	Not significant
CA-SDI-12375	Prehistoric	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring	Less than Significant

**Table 2.5-4  
Management Summary**

Site Number	Period	Significance/ Eligibility Status	Impact	Recommendations/ Mitigation Measures	Impact Significance After Mitigation
CA-SDI-12376	Historic	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring	Less than Significant
CA-SDI-12386	Prehistoric	Not relocated	Avoided/not significant	N/A	Not significant
CA-SDI-12387	Prehistoric	Not relocated	Avoided/not significant	N/A	Not significant
CA-SDI-12388	Prehistoric	Not relocated	Avoided/not significant	N/A	Not significant
CA-SDI-12389	Prehistoric	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring	Less than Significant
CA-SDI-12390	Prehistoric	Not relocated	Avoided/not significant	N/A	Not significant
CA-SDI-12393	Multicomponent	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring	Less than Significant
CA-SDI-12394	Prehistoric	Not relocated	Avoided/not significant	N/A	Not significant
CA-SDI-12395	Historic	Not relocated	Avoided/not significant	N/A	Not significant
CA-SDI-12398	Prehistoric	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring	Less than Significant
CA-SDI-12635	Prehistoric	Not relocated	Avoided/not significant	N/A	Not significant
CA-SDI-12937	Prehistoric	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring	Less than Significant

**Table 2.5-4  
Management Summary**

Site Number	Period	Significance/ Eligibility Status	Impact	Recommendations/ Mitigation Measures	Impact Significance After Mitigation
P-37-015037	Prehistoric	Isolate	Not Significant	N/A	Not significant
P-37-015039	Prehistoric	Isolate	Not Significant	N/A	Not significant
P-37-015053	Prehistoric	Isolate	Not Significant	N/A	Not significant
P-37-015055	Prehistoric	Isolate	Not Significant	N/A	Not significant
P-37-015056	Prehistoric	Isolate	Not Significant	N/A	Not significant
P-37-015057	Prehistoric	Isolate	Not Significant	N/A	Not significant
P-37-015058	Prehistoric Isolate	Isolate	Not Significant	N/A	Not significant
P-37-026523	Historic	Not relocated	Not significant	N/A	Not significant
P-37-026525	Historic	Not relocated	Not significant	N/A	Not significant
P-37-026532	Historic	Not relocated	Not significant	N/A	Not significant
CA-SDI-21624	Prehistoric	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring	Less than Significant
CA-SDI-21625	Prehistoric	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring	Less than Significant
CA-SDI-21626	Prehistoric	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring	Less than Significant

**Table 2.5-4  
Management Summary**

Site Number	Period	Significance/ Eligibility Status	Impact	Recommendations/ Mitigation Measures	Impact Significance After Mitigation
CA-SDI-21627	Prehistoric	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring	Less than Significant
CA-SDI-21628	Prehistoric	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring	Less than Significant
CA-SDI-21629	Historic	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring	Less than Significant
CA-SDI-21631	Prehistoric	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring	Less than Significant
CA-SDI-21913	Historic	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring	Less than Significant
CA-SDI-21914	Prehistoric	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring	Less than Significant
CA-SDI-21915	Multicomponent	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring	Less than Significant

**Table 2.5-4  
Management Summary**

Site Number	Period	Significance/ Eligibility Status	Impact	Recommendations/ Mitigation Measures	Impact Significance After Mitigation
CA-SDI-21917	Prehistoric	County: Important; CEQA: Not evaluated; CRHR: Potentially eligible; Otay Ranch RMP: Potentially significant; Local Register: Potentially eligible	Avoided/not significant	Avoidance – open space, evaluation, research, collection, curation, monitoring	Less than Significant

ADI = area of direct impact; CEQA = California Environmental Quality Act; County = County of San Diego; CRHR = California Register of Historical Resources; RMP = Resource Management Plan

**Table 2.5-5  
Resource Mitigation Measures**

Impacted Resources (Includes Portions of Sites Intersecting ADI)	
Site Numbers	Mitigation Measures
CA-SDI-12397 West,	Data recovery including temporary fencing
CA-SDI-12373 (Locus A)	Data Recovery
CA-SDI-6695B West, CA-SDI-8086A, CA-SDI-8086B, CA-SDI-8086C West (state lands), CA-SDI-11397 West, CA-SDI-12332 West, CA-SDI-12333 West, CA-SDI-12373 (Locus A), CA-SDI-12377 West, CA-SDI-12384 East, CA-SDI-12397 West, CA-SDI-21911 North, CA-SDI-21912 North, CA-SDI-21916 (trail)	Avoidance – open space
CA-SDI-6695B West, CA-SDI-11397 West, CA-SDI-12332 West, CA-SDI-12333 West, CA-SDI-12377 West, CA-SDI-12384 East, CA-SDI-12397 West, CA-SDI-21911 North, CA-SDI-21912 North	Temporary fencing
CA-SDI-6695A, CA-SDI-6695B East, CA-SDI-6695B West, CA-SDI-8086A, CA-SDI-8086B, CA-SDI-8086C East, CA-SDI-8086C West, CA-SDI-11394, CA-SDI-11396, CA-SDI-11397 East, CA-SDI-11397 West, CA-SDI-11399, CA-SDI-11417/CA-SDI-12378, CA-SDI-12314, CA-SDI-12315, CA-SDI-12316, CA-SDI-12317, CA-SDI-12318, CA-SDI-12320, CA-SDI-12328, CA-SDI-12329, CA-SDI-12330, CA-SDI-12332 East, CA-SDI-12332 West, CA-SDI-12333 East, CA-SDI-12333 West, CA-SDI-12377 East, CA-SDI-12377 West, CA-SDI-12379, CA-SDI-12380, CA-SDI-12381, CA-SDI-12382, CA-SDI-12384 East, CA-SDI-12384 West, CA-SDI-12385, CA-SDI-12391, CA-SDI-12396, CA-SDI-12397 East, CA-SDI-12397 West, CA-SDI-21630, CA-SDI-21632, CA-SDI-21633, CA-SDI-21911 North, CA-SDI-21911 South, CA-SDI-21912 North, CA-SDI-21912 South, CA-SDI-21916 (trail), CA-SDI-21924, CA-SDI-21925	Monitoring
CA-SDI-6695A, CA-SDI-6695B East, CA-SDI-6695B West, CA-SDI-8086A, CA-SDI-8086B, CA-SDI-8086C East, CA-SDI-	Curation or repatriation

**Table 2.5-5  
Resource Mitigation Measures**

<b>Impacted Resources (Includes Portions of Sites Intersecting ADI)</b>	
<i>Site Numbers</i>	<i>Mitigation Measures</i>
8086C West, CA-SDI-11394, CA-SDI-11396, CA-SDI-11397 East, CA-SDI-11397 West, CA-SDI-11399, CA-SDI-11417/CA-SDI-12378, CA-SDI-12314, CA-SDI-12315, CA-SDI-12316, CA-SDI-12317, CA-SDI-12318, CA-SDI-12320, CA-SDI-12328, CA-SDI-12329, CA-SDI-12330, CA-SDI-12332 East, CA-SDI-12332 West, CA-SDI-12333 East, CA-SDI-12333 West, CA-SDI-12373, CA-SDI-12377 East, CA-SDI-12377 West, CA-SDI-12379, CA-SDI-12380, CA-SDI-12381, CA-SDI-12382, CA-SDI-12384 East, CA-SDI-12384 West, CA-SDI-12385, CA-SDI-12391, CA-SDI-12396, CA-SDI-12397 East, CA-SDI-12397 West, CA-SDI-21630, CA-SDI-21632, CA-SDI-21633, CA-SDI-21911 North, CA-SDI-21911 South, CA-SDI-21912 North, CA-SDI-21912 South, CA-SDI-21916 (trail), CA-SDI-21924, CA-SDI-21925	
CA-SDI-6695A, CA-SDI-6695B East, CA-SDI-6695B West, CA-SDI-8086A, CA-SDI-8086B, CA-SDI-8086C East, CA-SDI-8086C West, CA-SDI-11394, CA-SDI-11396, CA-SDI-11397 East, CA-SDI-11397 West, CA-SDI-11399, CA-SDI-11417/CA-SDI-12378, CA-SDI-12314, CA-SDI-12315, CA-SDI-12316, CA-SDI-12317, CA-SDI-12318, CA-SDI-12320, CA-SDI-12328, CA-SDI-12329, CA-SDI-12330, CA-SDI-12332 East, CA-SDI-12332 West, CA-SDI-12333 East, CA-SDI-12333 West, CA-SDI-12373, CA-SDI-12377 East, CA-SDI-12377 West, CA-SDI-12379, CA-SDI-12380, CA-SDI-12381, CA-SDI-12382, CA-SDI-12384 East, CA-SDI-12384 West, CA-SDI-12385, CA-SDI-12391, CA-SDI-12396, CA-SDI-12397 East, CA-SDI-12397 West, CA-SDI-21630, CA-SDI-21632, CA-SDI-21633, CA-SDI-21911 North, CA-SDI-21911 South, CA-SDI-21912 North, CA-SDI-21912 South, CA-SDI-21916 (trail), CA-SDI-21924, CA-SDI-21925	Evaluation and recordation
CA-SDI-6695A, CA-SDI-6695B East, CA-SDI-6695B West, CA-SDI-8086A, CA-SDI-8086B, CA-SDI-8086C East, CA-SDI-8086C West, CA-SDI-11394, CA-SDI-11396, CA-SDI-11397 East, CA-SDI-11397 West, CA-SDI-11399, CA-SDI-11417/CA-SDI-12378, CA-SDI-12314, CA-SDI-12315, CA-SDI-12316, CA-SDI-12317, CA-SDI-12318, CA-SDI-12320, CA-SDI-12328, CA-SDI-12329, CA-SDI-12330, CA-SDI-12332 East, CA-SDI-12332 West, CA-SDI-12333 East, CA-SDI-12333 West, CA-SDI-12373, CA-SDI-12377 East, CA-SDI-12377 West, CA-SDI-12379, CA-SDI-12380, CA-SDI-12381, CA-SDI-12382, CA-SDI-12384 East, CA-SDI-12384 West, CA-SDI-12385, CA-SDI-12391, CA-SDI-12396, CA-SDI-12397 East, CA-SDI-12397 West, CA-SDI-21630, CA-SDI-21632, CA-SDI-21633, CA-SDI-21911 North, CA-SDI-21911 South, CA-SDI-21912 North, CA-SDI-21912 South, CA-SDI-21916 (trail), CA-SDI-21924, CA-SDI-21925	Research

**Table 2.5-5  
Resource Mitigation Measures**

<b>Impacted Resources (Includes Portions of Sites Intersecting ADI)</b>	
<i>Site Numbers</i>	<i>Mitigation Measures</i>
CA-SDI-11401, CA-SDI-11421, CA-SDI-12319, CA-SDI-12322, CA-SDI-12335, CA-SDI-12383, CA-SDI-12392, P-37-014834, P-37-015033, P-37-015035, P-37-015036, P-37-015038, P-37-015041, P-37-015042, P-37-015059, P-37-015060, P-37-026526	None – isolate or resource does not exist
<b>Avoided Resources</b>	
<i>Site Numbers</i>	<i>Mitigation Measures</i>
CA-SDI-6694, CA-SDI-6965, CA-SDI-11392, CA-SDI-11395, CA-SDI-11398, CA-SDI-11400, CA-SDI-11416, CA-SDI-11418, CA-SDI-11422, CA-SDI-12321, CA-SDI-12323, CA-SDI-12325, CA-SDI-12326, CA-SDI-12331, CA-SDI-12334, CA-SDI-12373 Locus B, CA-SDI-12375, CA-SDI-12376, CA-SDI-12389, CA-SDI-12393, CA-SDI-12398, CA-SDI-12937, CA-SDI-21,624, CA-SDI-21625, CA-SDI-21626, CA-SDI-21627, CA-SDI-21628, CA-SDI-21629, CA-SDI-21631, CA-SDI-21913, CA-SDI-21914, CA-SDI-21915, CA-SDI-21916, CA-SDI-21917	Open space
CA-SDI-12321, CA-SDI-12323	Temporary fencing
CA-SDI-6694, CA-SDI-6965, CA-SDI-11392, CA-SDI-11395, CA-SDI-11398, CA-SDI-11400, CA-SDI-11416, CA-SDI-11418, CA-SDI-11422, CA-SDI-12321, CA-SDI-12323, CA-SDI-12325, CA-SDI-12326, CA-SDI-12331, CA-SDI-12334, CA-SDI-12373, CA-SDI-12375, CA-SDI-12376, CA-SDI-12389, CA-SDI-12393, CA-SDI-12398, CA-SDI-12937, CA-SDI-21,624, CA-SDI-21625, CA-SDI-21626, CA-SDI-21627, CA-SDI-21628, CA-SDI-21629, CA-SDI-21631, CA-SDI-21913, CA-SDI-21914, CA-SDI-21915, CA-SDI-21916 (balance), CA-SDI-21917	Monitoring
CA-SDI-6694, CA-SDI-6965, CA-SDI-11392, CA-SDI-11395, CA-SDI-11398, CA-SDI-11400, CA-SDI-11416, CA-SDI-11418, CA-SDI-11422, CA-SDI-12321, CA-SDI-12323, CA-SDI-12325, CA-SDI-12326, CA-SDI-12331, CA-SDI-12334, CA-SDI-12373 Locus B, CA-SDI-12375, CA-SDI-12376, CA-SDI-12389, CA-SDI-12393, CA-SDI-12398, CA-SDI-12937, CA-SDI-21,624, CA-SDI-21625, CA-SDI-21626, CA-SDI-21627, CA-SDI-21628, CA-SDI-21629, CA-SDI-21631, CA-SDI-21913, CA-SDI-21914, CA-SDI-21915, CA-SDI-21916 (balance), CA-SDI-21917	Curation or repatriation

**Table 2.5-5  
Resource Mitigation Measures**

<b>Impacted Resources (Includes Portions of Sites Intersecting ADI)</b>	
<i>Site Numbers</i>	<i>Mitigation Measures</i>
CA-SDI-6694, CA-SDI-6965, CA-SDI-11392, CA-SDI-11395, CA-SDI-11398, CA-SDI-11400, CA-SDI-11416, CA-SDI-11418, CA-SDI-11422, CA-SDI-12321, CA-SDI-12323, CA-SDI-12325, CA-SDI-12326, CA-SDI-12331, CA-SDI-12334, CA-SDI-12373 Locus B, CA-SDI-12375, CA-SDI-12376, CA-SDI-12389, CA-SDI-12393, CA-SDI-12398, CA-SDI-12937, CA-SDI-21,624, CA-SDI-21625, CA-SDI-21626, CA-SDI-21627, CA-SDI-21628, CA-SDI-21629, CA-SDI-21631, CA-SDI-21913, CA-SDI-21914, CA-SDI-21915, CA-SDI-21916 (balance), CA-SDI-21917	Evaluation
CA-SDI-6694, CA-SDI-6965, CA-SDI-11392, CA-SDI-11395, CA-SDI-11398, CA-SDI-11400, CA-SDI-11416, CA-SDI-11418, CA-SDI-11422, CA-SDI-12321, CA-SDI-12323, CA-SDI-12325, CA-SDI-12326, CA-SDI-12331, CA-SDI-12334, CA-SDI-12373 Locus B, CA-SDI-12375, CA-SDI-12376, CA-SDI-12389, CA-SDI-12393, CA-SDI-12398, CA-SDI-12937, CA-SDI-21,624, CA-SDI-21625, CA-SDI-21626, CA-SDI-21627, CA-SDI-21628, CA-SDI-21629, CA-SDI-21631, CA-SDI-21913, CA-SDI-21914, CA-SDI-21915, CA-SDI-21916 (balance), CA-SDI-21917	Research
CA-SDI-11401, CA-SDI-11421, CA-SDI-12319, CA-SDI-12322, CA-SDI-12335, CA-SDI-12383, CA-SDI-12392, P-37-014834, P-37-015033, P-37-015035, P-37-015036, P-37-015038, P-37-015041, P-37-015042, P-37-015059, P-37-015060, P-37-026526	None – isolate or resource does not exist

ADI = area of direct impact

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