

## 2.5 Cultural and Paleontological Resources

This section describes the existing cultural and paleontological setting of the Alpine Community Plan Area (CPA) and evaluates the potential impacts from the proposed project on historic resources, archaeological resources, paleontological resources, and human remains. Consistent with the 2011 General Plan Environmental Impact Report (EIR) and 2016 Forest Conservation Initiative General Plan Amendment (GPA) EIR (FCI EIR), paleontological resources are analyzed in this section rather than in Geology and Soils as recommended with the recent updates to Appendix G of the State California Environmental Quality Act (CEQA) Guidelines. Geology and Soils was determined to be less than significant in the Notice of Preparation (NOP) and is included in Chapter 3.0, Other CEQA Considerations, of this Supplemental Environmental Impact Report (SEIR).

This section incorporates information and analysis from the 2011 General Plan EIR and 2016 FCI GPA EIR (referred throughout the rest of this section as “prior EIRs”) as they apply to the proposed project. Section 1.3 (*Project Background*) of this SEIR provides a background for both EIRs. The 2011 General Plan EIR analyzed the entirety of the Alpine CPA while the FCI EIR provided an updated analysis of impacts of land use changes within the FCI lands. The existing conditions outlined in this section are generally consistent with those described in the prior EIRs; however, there are some instances where updates or changes have occurred since the prior EIRs, which have been noted accordingly.

This section analyzes the increase in density and change in the mobility network compared to the approved densities within the prior EIRs. The existing conditions outlined in this section are generally consistent with those described in the prior EIRs because the type and location of cultural and paleontological resources have not changed significantly since those documents were prepared. However, there are some instances where updates or changes have occurred since the prior EIRs, which have been noted accordingly. The prior EIRs both have similar significance statements for Cultural and Paleontological Resources.

Table 2.5-1 summarizes the impact conclusions identified in this section.

**Table 2.5-1. Cultural and Paleontological Resources Summary of Impacts**

| <b>Issue Number</b> | <b>Issue Area</b>         | <b>Prior EIRs Conclusion</b> | <b>Project Direct Impact(s)</b> | <b>Project Cumulative Impact(s)</b> | <b>Level of Significance After Mitigation</b> |
|---------------------|---------------------------|------------------------------|---------------------------------|-------------------------------------|-----------------------------------------------|
| CUL-1               | Historic Resources        | Less than Significant        | Potentially Significant         | Potentially Significant             | Less than Significant                         |
| CUL-2               | Archaeological Resources  | Less than Significant        | Potentially Significant         | Potentially Significant             | Less than Significant                         |
| CUL-3               | Paleontological Resources | Less than Significant        | Potentially Significant         | Potentially Significant             | Less than Significant                         |
| CUL-4               | Human Remains             | Less than Significant        | Potentially Significant         | Potentially Significant             | Less than Significant                         |

Comments received in response to the NOP related to cultural and paleontological resources included concerns regarding the preservation of cultural resources during the Alpine Community Plan Update (CPU) planning process, tribal consultation, and impacts on sensitive cultural resources. These concerns are addressed and summarized in this section.

A copy of the NOP and comment letters received in response to the NOP are included in Appendix A of this SEIR. This section incorporates information and analyses from the prior EIRs as it applies to the Alpine CPU (proposed project).

## **2.5.1 Existing Conditions**

This section describes the existing cultural and paleontological setting of the Alpine CPA. Section 2.5.1 of the prior EIRs included a discussion of existing conditions related to cultural and paleontological resources in the unincorporated County. Any projects that have occurred within the Alpine CPA were required to be consistent with the development allowed by the General Plan. In addition, they would have been required to comply with all General Plan policies and mitigation measures to ensure that impacts remain less than significant. Therefore, no other changes to the existing conditions have been identified that would alter the conclusions in the prior EIRs. The discussion of existing conditions from the prior EIRs is incorporated by reference.

### **2.5.1.1 *Cultural Setting***

Cultural resources, which include both archaeological and historical resources, are found throughout San Diego County and are reminders of the County's prehistoric and historic past. Archaeological and historical resources are the remains left by the people who made and used them and may include gathering areas, landmarks, significant historical buildings and ethnographic locations, as well as physical artifacts. Archaeological resources include prehistoric and historic artifacts and features, and historic resources refer to the built environment 50 years or older. These resources can provide clues to prehistoric and historic human behaviors and provide scientific, religious, and other valuable educational information about the cultural past.

#### **Archaeological Resources**

Archaeological evidence suggests that San Diego County has an extensive cultural history beginning approximately 10,000 years ago. The County also acknowledges that other perspectives exist regarding the history of San Diego County. The Native American perspective, which is supported by creation stories, is that humans have inhabited this region from the beginning and that there has been a continuum of ancestry from the first people to the present Native American populations of San Diego County (County of San Diego 2007a). A detailed outline of the early history of San Diego County, including the Alpine CPA, can be found in Section 2.5 of the prior EIRs. Many prehistoric habitation and smaller resource gathering and processing sites have been recorded within the Alpine CPA. Information about these sites is kept confidential to protect these resources from destruction or theft.

#### **Historic Resources**

Historic resources are related to the introduction of Mexican and American settlers to the Alpine CPA. The entire CPA was reclaimed from Spanish missions and given as a land grant to brothers Ramon and Leandro Osuna by Governor José Figueroa in 1846 under the name Rancho Valle de las Viejas y Mesa del Arroz (Bean and Rawls 2003). After the Mexican-American War in 1848 and the establishment of the Land Commission in 1851, the Alpine area became part of a smaller tract deeded to Don José Antonio Aguirre, whose family held the property until the 1860s (Alpine Historical Society 2019). After the 1860s, J.S. Harbison established the first commercial apiary operation in San Diego County in the Harbison Canyon area of Alpine, and ex-Confederate veterans Joseph Harden, Adam Beaty, and Royal Barton established small ranches in the Alpine area (La Force 1971). It was during this time that the nucleus of the Village began to form around the Viejas stage stop (Alpine Historical Society 2019).

Alpine was named after George and Nellie Webb's Alpine Ranch, which was established in the early 1870s. George Webb established the San Diego-Julian Toll Road in 1871 as an alternative to the Julian Banner Toll Road and this helped to establish the community permanently. However, much of the area was barred to settlement due to a legal dispute with the Texas Pacific Railroad, which laid claim to the area before an agreement was reached in 1885. This changed during the "Boom of the Eighties," which was sparked by the completion of the Santa Fe railroad line to National City, and numerous town sites were laid out throughout San Diego County during this time (Dumke 1944), including Alpine. Pioneer families established farms, orchards, and ranches; their surplus was transported by wagon for sale in markets throughout San Diego.

No records search was conducted for the proposed project, but a review of the County of San Diego Historical Property Listing shows that two resources, the Julian Eltinge Residence and the Alpine Woman's Club/Alpine Town Hall building, were brought before the County's Historical Site Board, recommended for listing in the Local Register of Historical Resources, and approved by Planning & Development Services. Neither of these historical resources is located within the Alpine CPU subareas, but they are described and analyzed to evaluate whether they may be impacted by the proposed project (Figures 2.5-1a and 2.5-1b). A third resource, the Alpine Tobacco Company, is a qualified historic unreinforced building and the property owner has not applied for historic designation. Several other structures throughout the community are likely eligible for listing in the Local Register. However, to date, no comprehensive historical resources inventory that identifies these resources has been completed.

#### Julian Eltinge Residence (Sierra Vista Rancho), 2690 South Grade Road

The Julian Eltinge Residence was built by William Dalton, a star of stage and screen from the early 1900s until his death in 1941. Dalton was a female impersonator known worldwide for his stage persona Julian Eltinge. Dalton appeared in numerous plays, vaudeville shows, and later motion pictures as Julian. Dalton moved to Alpine in 1923 and bought a large parcel with the intention of creating a resort that would attract fellow artists. He built a home with two additional cottages, a swimming pool, and outbuildings. However, his popularity waned as a performer, and his plans for building the resort never materialized. Dalton used his Alpine home as his primary residence from 1930 until his death in 1941. The home he built still stands and was added to the Local Register of Historical Resources on August 30, 2005, for its association with William Dalton (significant individual).

#### Alpine Woman's Club, 2156 Alpine Boulevard

Originally built as the Alpine Town Hall in 1899, the Alpine Woman's Club building has housed the Alpine Woman's Club since 1914. The creed of the Club "is to promote a spirit of community cooperation and to engage in all manner of charitable, social, educational and recreational endeavors conducive to the public welfare." In 1932, the Club acquired the building and built a comfort station for travelers. The building was also used as an unofficial welcoming center for the community. The Club still owns the building and uses it for its meetings. The building was added to the Local Register of Historical Resources on November 9, 2006.

### **2.5.1.2 Paleontological Setting**

As described by the prior EIRs, paleontological resources are the traces and remains of prehistoric life (exclusive of human remains, artifacts, or features) which may be defined as fossils. Paleontological resources include the localities where the fossils are collected and the rock formations in which they were formed. Fossils are the result of the preservation of organic remains through a complex interaction between physical and biological factors. Fossil remains commonly include marine shells; bones and teeth

of fish, reptiles, and mammals; leaf assemblages; and petrified wood. Trace fossils include internal and external molds and casts and provide evidence for the past activities of fossil organisms such as footprints and trackways, burrows and boreholes, coprolites, nests, and (packrat) middens. The discussion of paleontological background from the prior EIRs is incorporated by reference.

### Paleontological Resources

Alpine is located within the Peninsular Ranges Region, which is between the foothills of Cowles Mountain and Bernardo Mountain on the west and In-Ko-Pah Gorge and Palomar Mountain on the east. As detailed in the prior EIRs, this region is primarily underlain by plutonic igneous rocks with some sedimentary rock units in Quaternary alluvial and alluvial fan deposits and Quaternary peat deposits in the mountain valleys.

Sensitivity levels are rated for individual geologic formations, and the sensitivity level of the geologic formation is the same as the resource's potential ratings, as it is the formation that contains the fossil remains. The majority of the Alpine CPA has zero potential for paleontological resources, but there are places where the sensitivity is low, marginal, or moderate (see Figures 2.5-2a and 2b). As detailed in the prior EIRs, formations with low sensitivity are those unlikely to produce unique fossil remains. However, when paleontological resources are found in such formations, they are often significant additions to the geologic understanding of the area. No subareas contain formations of low sensitivity, but there are places within the Alpine CPA that have a low potential for producing unique fossil remains. Marginally sensitive formations are composed of either volcanoclastic or metasedimentary rocks, which have a limited probability for producing fossils, and although marginally sensitive formations are present in the southwestern portion of the Alpine CPA, they are not present in any of the subareas for the proposed project. Moderately sensitive formations are considered to have a strong, but often unproven, potential for producing unique fossil remains. Subarea 2 is the only subarea with moderately sensitive geologic formations.

Alpine also contains unique geological resources. A geologic unit or feature is unique if it is the best example of its kind locally or regionally, embodies the distinctive characteristics of a geologic principle that is exclusive locally or regionally, provides important geological information including geologic history, is a type locality of a geologic feature, contains a mineral not known to occur elsewhere in the San Diego County, is used repeatedly as a teaching tool, or is otherwise identified as unique by the County's Guidelines for Determining Significance – Unique Geology (County of San Diego 2007b). The majority of the Alpine CPA has low potential for unique geological resources. However, certain regions of the Alpine CPA, particularly in the northwest, north-central, and southeast portions of the CPA, have the potential for containing unique resources (see Figures 2.5-3a through 2.5-3c). Figure 2.5-3a identifies that unique geology is present adjacent to Subarea 4 (moderate sensitivity) and Figure 2.5-3b identifies that unique geology within Subarea 7 (moderate and high sensitivity).

These conditions are the same as those analyzed in the prior EIRs and no conditions have been identified in the Alpine region that would change the conclusions reached by the prior EIRs.

## **2.5.2 Regulatory Framework**

Section 2.5.2 of the prior EIRs included a discussion of the Regulatory Framework related to cultural resources in the unincorporated County, including the Alpine CPA, which is hereby incorporated by reference. The regulations described in the prior EIRs that were applicable to the entire County have not changed since adoption, with the exception of the addition of the federal Paleontological Resources

Preservation Act of 2002 and California Assembly Bill 52 (AB-52), which were not included in the prior EIRs.

The regulations described in the prior EIRs have not changed and will not be repeated here but are listed below for reference. No changes have been made to any of the regulations mentioned in the prior EIRs that would alter the conclusions from the prior EIRs. A summary of the new regulations, the Paleontological Resources Preservation Act and AB-52, are provided below.

Applicable federal regulations include:

- Executive Order 12072
- Historical Sites, Buildings, Objects, and Antiquities Act
- National Historical Landmarks Program
- National Historical Preservation Act Section 106
- National Register of Historic Places (NRHP)
- Native American Graves Protection and Repatriation Act (NAGPRA)
- The Secretary of the Interior's Standards.

Applicable state regulations include:

- State Historical Landmarks Program
- State Points of Historical Interest Program
- California Register of Historical Resources (CRHR)
- California Native American Graves Protection and Repatriation Act (Cal NAGPRA)
- Public Resources Code (PRC) (Sections 5079–5079.65, 5097–5097.6, and 5097–5097.991)
- Government Code (Sections 25373, 27288.2, and 50280–50290 – Mills Act)
- Health and Safety Code (HSC) (Sections 18950–18961 and 7050.5)
- Penal Code Section 622
- Senate Bill (SB-18).

Applicable local regulations include:

- County of San Diego Code of Regulatory Ordinances Sections 87.101-87.804, Grading Clearing, and Watercourse Ordinance
- County of San Diego Code of Regulatory Ordinances Sections 86.601-86.608, Resource Protection Ordinance (RPO)
- County Zoning Ordinance
- Resource Conservation Areas
- County of San Diego Local Register of Historical Resources
- County of San Diego Historical Site Board.

Applicable regulations not included in or adopted after adoption of the prior EIRs are described below.

### ***2.5.2.1 Paleontological Resources Preservation Act of 2002***

The federal Paleontological Resources Preservation Act of 2002 was enacted to codify the generally accepted practice of limiting the collection of vertebrate fossils and other rare and scientifically significant fossils to qualified researchers; these researchers must obtain a permit from the appropriate state or federal agency and agree to donate any materials recovered to recognized public institutions, where they will remain accessible to the public and to other researchers.

### **2.5.2.2 Assembly Bill 52 (AB-52)**

AB-52 (Chapter 532, Statutes of 2014) establishes a formal consultation process for California Native American tribes as part of CEQA and equates significant impacts on tribal cultural resources with significant environmental impacts (PRC Section 21084.2).

PRC Section 21074 defines tribal cultural resources as follows.

- Sites, features, places, sacred places, and objects with cultural value to descendant communities or cultural landscapes defined in size and scope that are:
  - Included in or eligible for listing in the CRHR; or,
  - Included in a local register of historical resources.
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1.

Sacred places can include Native American sanctified cemeteries, places of worship, religious or ceremonial sites, and sacred shrines. In addition, both unique and non-unique archaeological resources, as defined in PRC Section 21083.2, can be tribal cultural resources if they meet the criteria detailed above. The lead agency relies upon substantial evidence to make the determination that a resource qualifies as a tribal cultural resource when it is not already listed in the CRHR or a local register of historical resources.

AB-52 defines a “California Native American Tribe” (Tribe) as a Native American Tribe located in California that is on the contact list maintained by the Native American Heritage Commission (NAHC) (PRC Section 21073). Under AB-52, formal consultation with Tribes is required prior to determining the level of environmental document if a Tribe has requested to be informed by the lead agency of proposed projects and if the Tribe, upon receiving notice of the project, accepts the opportunity to consult within 30 days of receipt of the notice. AB-52 also requires that consultation, if initiated, address project alternatives and mitigation measures for significant effects, if specifically requested by the Tribe. AB-52 states that consultation is considered concluded when either the parties agree to measures to mitigate or avoid a significant effect on tribal cultural resources, or when either the Tribe or the agency concludes that mutual agreement cannot be reached after making a reasonable, good-faith effort. Under AB-52, any mitigation measures recommended by the agency or agreed upon with the Tribe may be included in the final environmental document and in the adopted mitigation monitoring program if they were determined to avoid or lessen a significant impact on a tribal cultural resource. If the recommended measures are not included in the final environmental document, then the lead agency must consider the four mitigation methods described in PRC Section 21084.3(b):

- Avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
- Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
  - Protecting the cultural character and integrity of the resource.
  - Protecting the traditional use of the resource.
  - Protecting the confidentiality of the resource.

- Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- Protecting the resource.

Any information submitted by a Tribe during the consultation process is considered confidential and is not subject to public review or disclosure. It will be published in a confidential appendix to the environmental document unless the Tribe consents to disclosure of all or some of the information to the public.

### ***2.5.2.3 County of San Diego General Plan Policies***

The General Plan includes goals and policies intended to protect historic resources, archaeological resources, paleontological resources, and human remains within the Conservation and Open Space Element.

#### **Conservation and Open Space Element**

Goal COS-7 is to protect and preserve San Diego County's important archaeological resources for their cultural importance to local communities and their research and educational value. Policies COS-7.1, COS-7.2, COS-7.3, COS-7.4, COS-7.5, and COS-7.6 support this goal by describing how archaeological resources should be managed. Policy COS-7.1 requires development to include appropriate mitigation to protect the quantity and integrity of important archaeological resources. Policy COS-7.2 requires development to avoid archaeological resources whenever possible and, where this is not possible, requires development to fully mitigate any impacts to these resources. Policy COS-7.3 requires that archaeological collections be treated and preserved in a culturally appropriate manner, and policies COS-7.4 and COS-7.6 require consultation with agencies and affected communities, including local tribes, to determine the appropriate treatment of cultural resources. Policy COS-7.5 requires that human remains be treated with dignity and respect, and that any necessary handling of human remains be done in consultation with the Most Likely Descendant (MLD) and according to the requirements of federal, state, and local regulations.

Goal COS-8 identifies the importance of protecting, conserving, using, and enjoying San Diego County's important historical resources. Policy COS-8.1 supports this goal by encouraging the preservation and/or adaptive reuse of historic sites, structures, and landscapes as a means of protecting important historic resources identified during both discretionary and ministerial permitting processes.

Goal COS-9 requires that paleontological resources and unique geological features be conserved for educational and scientific purposes. This is supported by policy COS-9.1, which requires that unique paleontological resources that may be exposed to the elements during development processes be salvaged and preserved, and policy COS-9.2 which requires development to minimize impacts to unique geological features from human-related damage, destruction, or loss.

### ***2.5.2.4 Alpine CPU Policies***

No Alpine CPU policies are directly applicable to historic resources, archaeological resources, paleontological resources, or human remains.

### 2.5.3 Analysis of Project Effects and Determination as to Significance

Based on Appendix G of the State CEQA Guidelines, the County's Guidelines for Determining Significance – Cultural Resources: Archaeological and Historic Resources (2007a), the County's Guidelines for Determining Significance – Paleontological Resources (2009), and the County's Guidelines for Determining Significance – Unique Geology (2007b), the proposed project would result in a significant impact if it would:

- Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the State CEQA Guidelines.
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the State CEQA Guidelines.
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
- Disturb any human remains, including those interred outside of formal cemeteries.

#### 2.5.3.1 *Issue 1: Historical Resources*

##### Guidelines for the Determination of Significance Analysis

Based on Appendix G of the State CEQA Guidelines and the County's Guidelines for Determining Significance – Cultural Resources: Archaeological and Historic Resources, the proposed project would have a significant impact if it would result in a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the State CEQA Guidelines or the County's RPO through physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired. The significance of a historical resource is materially impaired when a project:

- Demolishes or materially alters in an adverse manner those physical characteristics of a 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 PRC or its identification in a historical resources survey meeting the requirements of Section 5024.1(g) of the PRC, 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 a 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 Guidelines Section 15064.5(b)(2).

In addition, Section 15064.5(a) of the State CEQA Guidelines 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 CRHR (Pub. Res. Code, Section 5024.1, Title 14 [California Code of Regulations] 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 PRC or identified as significant in a historical resource survey meeting the requirements of Section 5024.1(g) of the PRC, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
3. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a 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 in the CRHR (Pub. Res. Code, Section 5024.1, Title 14 CCR, Section 4852 et. seq.) including the following:

- a. Criterion A: Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage. Examples include resources associated with the Battle of San Pasqual, gold mining in the Julian area, or a Kumeyaay settlement.
  - b. Criterion B: Is associated with the lives of persons important in the past. Examples of significant resources include those associated with the lives of George W. Marston, Kate Sessions, John D. Spreckels, Ellen Browning Scripps, Ah Quin, Manuel O. Medina, Jose Manuel Polton (Hatam), or Jose Pedro Panto.
  - c. Criterion C: Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values. Resources representing the work of architects such as William Templeton Johnson, Irving Gill, Lilian Rice, or Hazel Waterman would be considered significant because they represent the work of an important creative individual; or if a resource is identified as a Queen Anne, Mission Revival, Craftsman, Spanish Colonial, or Western Ranch Style structure, it would be significant because it embodies the distinctive characteristics of a type or period.
  - d. Criterion D: Has yielded, or may be likely to yield, information important in history. For example, a historical stone dam would be significant because it is considered unique and is likely to yield information important to history.
4. The fact that a resource is not listed in, or determined to be eligible for listing in the CRHR, not included in a local register of historical resources (pursuant to Section 5020.1(k) of the PRC), or identified in a historical resources survey (meeting the criteria in Section 5024.1(g) of the PRC) does not preclude a lead agency from determining that the resource may be a historical resource as defined in PRC Sections 5020.1(j) or 5024.1.

The following definition of an historic or archaeological resource is provided in the County's RPO:

- Any prehistoric or historic district, site, interrelated collection of features or artifacts, building, structure, or object either:
  - Formally determined eligible or listed in the NRHP by the Keeper of the National Register;
  - or

- To which the Historic Resource (“H” Designator) Special Area Regulations have been applied; or
- One-of-a-kind, locally unique, or regionally unique cultural resources which contain a significant volume and range of data and materials; and
- Any location of past or current sacred religious or ceremonial observances which is either:
  - Protected under Public Law 95-341, the American Indian Religious Freedom Act or PRC Section 5097.9, such as burials, pictographs, petroglyphs, solstice observatory sites, sacred shrines, religious ground figures, or
  - Other formally designated and recognized sites which are of ritual, ceremonial, or sacred value to any prehistorical or historical ethnic group.

Additional criteria for defining historical resources that apply to the identification and evaluation of cultural resources in the Alpine CPA include Section 5020.1 of the PRC and the County of San Diego Ordinance No. 9493 (Local Register of Historical Resources – County Administrative Code Section 396.7), Section V (d) (2), which are described below:

Section 5020.1 of the PRC defines a historical district as a definable unified geographic entity that possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development. A historical landmark means any historical resource that is registered as a state historical landmark pursuant to Section 5021, and a historical resource includes, but is not limited to, any object, building, structure, site, area, place, record, or manuscript that is historically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California.

The County of San Diego Ordinance No. 9493, Section V (d) (2) (Types of Historical Resources and Criteria for Listing in the San Diego County Register of Historical Resources) states that one of the criteria for historical listing is: “historical resources achieving significance within the past fifty (50) years.” However, the County’s Significance Guidelines states that “A resource less than fifty (50) years old may be considered if it can be determined that sufficient time has passed to understand its historical importance.”

### Impact Analysis

The prior EIRs determined that the proposed land use designations and accompanying future development based on those designations would result in potentially significant direct and indirect impacts on historical resources. The discussion of impacts on historical resources from implementation of the 2011 General Plan and FCI GPA can be found in Section 2.5.3.1 of the prior EIRs and is hereby incorporated by reference.

The prior EIRs concluded that implementation of the 2011 General Plan and FCI GPA would have the potential to result in substantial adverse changes to the significance of historical resources. In addition, implementation of the 2011 General Plan and FCI GPA would have the potential to contribute to potentially significant cumulative impacts associated with historical resources. Impacts were determined to be less than significant with implementation of mitigation measures and General Plan policies. The preservation and protection of historical resources is required through compliance with the RPO, CEQA, the Grading and Clearing Ordinance, and the Zoning Ordinance. Furthermore, General Plan policy COS-8.1 encourages the adaptive reuse, restoration, and renovation of historical resources.

The proposed project would increase the current allowed density in three (Subareas 2, 4, and 6) of the seven subareas and expand mobility networks, and therefore has the potential to affect historical

resources within the Alpine CPA. It should be noted that the General Plan densities have not yet been fully built out, so the analysis below focuses on what the change to the environment would be when comparing the 6,430 dwelling units currently allowed under the General Plan to the 8,443 dwelling units that would be allowed by the Alpine CPU, an increase of 2,013 dwelling units in total.

Figures 2.5-1a and 1b identify known historic resources within the vicinity of the seven subareas within the Alpine CPA. As shown in Figures 2.5-1a and 1b, there are two known historical resources within the Alpine CPA. The Julian Eltinge Residence is located along South Grade Road, south of Subareas 2 and 6. The Alpine Woman's Club is located along Alpine Boulevard, west of Subarea 6. The proposed project would allow an increase of up to 780 units within Subarea 2 and up to 579 dwelling units within Subarea 6. As a result, the future impacts under the proposed project would be greater than those identified in the prior EIRs, and the impact would be significant to known historical resources.

Some historical resources exist within the Alpine CPA that are historically significant but have not yet been designated, and there may also be unknown historical resources within the Alpine CPA. Designated, potentially significant but undesignated, and unknown historical resources could be directly or indirectly impacted as a result of new development allowed under the proposed project. An example of a direct impact to a historical resource would be the demolition of a historical building during the development of new dwelling units. Historical resources could also be disturbed or degraded as a result of increased human activity in areas which contain historical resources.

The proposed project would allow for a greater density and increase in the number of dwelling units in Subareas 2, 4, and 6, and mobility network changes; however, Subarea 5 would have a reduction in dwelling units. Any future development projects would be subject to an environmental review process, which may include record searches, site-specific pedestrian surveys, and historical evaluations. The purpose of the review process is to identify potential historical resources and identify mitigation measures that will minimize any impacts to these resources. In addition, any future projects in the Alpine CPA will be subject to federal, state, and local regulations, and must conform to the goals and policies established in the General Plan. Despite these regulations and policies, this impact is **potentially significant** because the increase in development could directly or indirectly disturb or damage historical resources within the Alpine CPA.

### *Federal, State, and Local Regulations and Existing Regulatory Processes*

As identified in Section 2.5.2, *Regulatory Framework*, there are numerous federal, state, and local regulations in place to protect historical resources in San Diego County that are also applicable to the Alpine CPU.

The RPO requires that cultural resources be evaluated as part of the County's discretionary environmental review process and prohibits trenching, grading, clearing and grubbing, or any other activity or use damaging to significant historical site lands, except for scientific investigation with an approved research design prepared by a certified archaeologist.

PRC Section 5097 outlines the requirements for a cultural resource analysis prior to construction on state lands, and the PRC and California Penal Code 622.5 make it a misdemeanor criminal offense to disturb or destroy historical resources without authorization.

The Mills Act program grants local governments the authority to directly implement a historical preservation program. Within the Alpine CPA, the Julian Eltinge property is identified as a Mills Act property. The County of San Diego requires all Mills Act properties to follow the Secretary of the Interior's Standards for Rehabilitation, which provide regulations for the restoration or rehabilitation of historical

structures to preserve their original or restored architectural elements and features while providing a safe building for occupants. California HSC 18950-18961 provides additional regulations regarding restoration and rehabilitation, and the Secretary of the Interior's Standards for the Treatment of Historical Properties supports the protection of historical resources by promoting consistent preservation practices.

In addition, policy COS-8.1 of the General Plan encourages future developers to preserve and adaptively reuse historical sites where appropriate, which could reduce the potential for future development to cause a substantial adverse change in the significance of a historical resource. The prior EIRs also identified several mitigation measures addressing impacts related to historical resources that would be applicable to the proposed project, including Cul-1.1 through Cul-1.8, which are provided in Section 2.5.6, *Mitigation*, below.

### ***Summary***

The proposed project increases the permitted densities within the CPA, which may impact historical sites within the Alpine CPA such as the Julian Eltinge Residence and the Alpine Woman's Club. Future development projects implemented under the proposed project may also impact identified but undesignated and unknown historical resources within the Alpine CPA. Future projects would be required to comply with the numerous regulations established to protect historical resources, and any historical resources identified during the preparation of discretionary permits would be evaluated according to the County's Guidelines for Determining Significance – Cultural Resources: Archaeological and Historic Resources. Despite these regulations and policies, impacts to historical resources would be **potentially significant**, and mitigation would be required (**Impact-CUL-1**).

## ***2.5.3.2 Issue 2: Archaeological Resources***

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

Significant cultural resources are non-renewable and therefore cannot be replaced. The disturbance or alteration of a cultural resource causes an irreversible loss of significant information. The proposed project would have a potentially significant impact if it would cause a substantial adverse change in the significance of an archaeological resource as defined by PRC Section 21083.2, State CEQA Guidelines Section 15064.5(a), County Guidelines for Determining Significance – Cultural Resources: Archaeological and Historic Resources, and the criteria provided below. This includes 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.

PRC Section 21083.2 defines a unique archaeological resource as 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 any of the following criteria:

1. Contains information needed to answer important scientific research 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.

Under the State CEQA Guidelines, archaeological resources may also be considered historical resources. Therefore, definitions of archaeological resources, as defined in State CEQA Guidelines Section 15064.5 and the County's RPO are the same as those provided for Issue 1.

### Impact Analysis

The prior EIRs determined that future development would result in potentially significant direct and indirect impacts on archaeological resources. The discussion of impacts to archaeological resources from implementation of the 2011 General Plan and FCI GPA can be found in Section 2.5.34.2 of the prior EIRs and is hereby incorporated by reference.

The prior EIRs concluded that implementation of the 2011 General Plan and FCI GPA would have the potential to result in a substantial adverse change in the significance of an archaeological resource, including 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. In addition, implementation of the 2011 General Plan and FCI GPA would have the potential to contribute to potentially significant cumulative impacts associated with archaeological resources. Impacts were determined to be less than significant with implementation of mitigation measures and General Plan policies. Specifically, General Plan policies COS-7.1 through 7.4, and 7.6 require the preservation and avoidance of archaeological resources whenever possible, appropriate treatment of archaeological resources, and consultation and coordination with agencies and local tribal governments. Furthermore, the preservation and protection of archaeological resources is required through compliance with the RPO, CEQA, the Grading and Clearing Ordinance, and the Zoning Ordinance.

The proposed project would allow for increased dwelling units in Subareas 2, 4, and 6, amounting to a potential increase of 2,013 dwelling units in the Alpine CPA. Additionally, proposed mobility network changes associated with the proposed project would allow roadway reclassifications, reconfigurations, and new roadways. Both the increase in dwelling units and mobility network changes would have the potential to impact known and unknown archaeological resources within the Alpine CPA because of the ground-disturbing activities with building dwelling units and constructing and reconfiguring roads. The increase in density could equate to greater ground disturbance. As such, these impacts would be greater because development could be more spread out. The General Plan densities have not yet been fully built out, so the analysis below focuses on what the change to the environment would be when comparing the 6,430 dwelling units currently allowed by the General Plan to the 8,443 units proposed in the Alpine CPU.

Because this is a programmatic analysis and the Alpine CPU is intended to serve as a long-term planning document, a records search or pedestrian survey was not completed to determine the location of existing cultural resources within the Alpine CPA. Subsequent projects seeking a discretionary permit may be subject to an environmental review process, at which point a records search would be conducted to determine whether a pedestrian survey or cultural resources evaluations would be required.

Future development projects implemented under the proposed project could directly impact significant, unevaluated, and unknown archaeological resources within the Alpine CPA, either directly or indirectly. Ground-disturbing activities such as clearing, excavation, trenching, and grading associated with the construction of structures and infrastructure have the potential to damage or destroy archaeological resources that may be present on or below the ground surface, particularly in areas that have not previously been developed. Indirect impacts to archaeological resources may also occur as a result of land development activities that increase erosion, dust, or accessibility to a surface or subsurface archaeological resource, possibly increasing the degradation of the resource. Implementation of the proposed project would also result in the exposure of resources to increased human activity and may lead

to human encroachment onto archaeological sites or a decrease in the integrity of archaeological resources.

The proposed changes associated with the proposed project have the potential to adversely directly and indirectly impact known and unknown archaeological resources in the Alpine CPA. Damage to archaeological resources may result in the loss of valuable information from a resource or prevent a potentially eligible site from being listed in the federal, state, or local historical registers, which would be considered a significant impact to the archaeological resource. Any future development would be subject to an environmental review process and federal, state, and local regulations that protect archaeological resources. Future projects would also be expected to conform with the goals and policies of the General Plan. However, the increase in development could still adversely impact archaeological resources in the Alpine CPA to a degree greater than was analyzed by the prior EIRs. As such, this impact is **potentially significant**.

### *Federal, State, and Local Regulations and Existing Regulatory Processes*

As identified in Section 2.5.2, *Regulatory Framework*, numerous federal, state, and local regulations are in place to protect archaeological resources in San Diego County that are also applicable to the proposed project. All projects proposed after the implementation of the Alpine CPU would be required to comply with all applicable regulations pertaining to archaeological resources, such as PRC Section 5097, and the RPO.

PRC Section 5097 outlines the requirements for cultural resource analysis prior to construction on state lands and prohibits severe or irreparable damage to any Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine located on public property, except with a clear and convincing showing that the public interest and necessity require it. California Penal Code Section 622.5 makes it a misdemeanor criminal offense to disturb or remove archaeological resources without authorization.

The RPO prohibits trenching, grading, clearing and grubbing, or any other activity or use damaging to significant archaeological site lands, except for scientific investigation with an approved research design prepared by a certified archaeologist. It also requires that cultural resources be evaluated as part of the County's discretionary environmental review process.

The General Plan also includes several policies within the Conservation Element that would reduce the potential for the proposed project to cause a substantial adverse change in the significance of an archaeological resource. Policies COS-7.1 through COS-7.4, which are presented in Section 2.5.2, require the preservation and avoidance of archaeological resources whenever possible, appropriate treatment of archaeological resources, and consultation with affected communities. Additionally, the prior EIRs identified several mitigation measures addressing impacts related to archaeological resources that would be applicable to the proposed project, including Cul-2.1 through Cul-2.6, which are provided in Section 2.5.6 of this document.

In addition to these regulations and policies, all discretionary approvals are also subject to CEQA, which requires consideration of potential impacts on archaeological resources. The County employs several cultural specialists who review projects and access local and regional databases to determine whether further study is necessary. Because of the potential presence of unknown archaeological resources, pedestrian surveys and cultural studies may be required in addition to these records searches, particularly where a project site had not been previously surveyed.

## Summary

The proposed project increases the permitted densities within the CPA, which may impact known and unknown archaeological sites within the Alpine CPA. As a result, future projects implemented under the proposed project may indirectly or directly impact archaeological resources. The Alpine CPU does not include any goals or policies that are related to archaeological resources, but the General Plan includes several policies (COS-7.1 through COS-7.6) which are designed to protect archaeological resources. Other federal, state, and local regulations also protect archaeological resources, and the environmental review process is designed to avoid impacts to archaeological resources. However, because the proposed project allows increased construction of dwelling units and infrastructure, and because many archaeological resources within the Alpine CPA may be unknown or unevaluated, impacts would be greater than those analyzed in the prior EIRs. Therefore, the impacts to archaeological resources would be **potentially significant**, and mitigation is required (**Impact-CUL-2**).

### 2.5.3.3 *Issue 3: Paleontological Resources*

#### Guidelines for the Determination of Significance Analysis

Geologic deposits containing fossils of extinct organisms are limited and non-renewable. According to Appendix G of the State CEQA Guidelines, the proposed project would have a significant impact if it would directly or indirectly destroy a unique paleontological resource or site, or unique geologic feature.

According to the County's Guidelines for Determining Significance - Paleontological Resources, a unique paleontological resource is any fossil or assemblage of fossils, paleontological resource site, or formation that meets any one of the following criteria:

- Is the best example of its kind locally or regionally
- Illustrates a paleontological or evolutionary principle (e.g., faunal succession)
- Provides a critical piece of paleobiological data (illustrates a portion of geologic history or provides evolutionary, paleoclimatic, paleoecological, paleoenvironmental or biochronological data)
- Encompasses any part of a "type locality" of a fossil or formation
- Contains a unique or particularly unusual assemblage of fossils
- Occupies a unique position stratigraphically within a formation
- Occupies a unique position, proximally, distally or laterally within a formation's extent or distribution.

The County's Guidelines for Determining Significance – Unique Geology identifies unique geology as a geological unit or feature that that meets any one of the following criteria:

- Is the best example of its kind locally or regionally
- Embodies the distinctive characteristics of a geologic principle that is exclusive locally or regionally
- Provides a key piece of geologic information important in geology or geologic history
- Is a "type locality" of a geologic feature

- Is a geologic formation that is exclusive locally or regionally
- Contains a mineral that is not known to occur elsewhere in the County, or
- Is used repeatedly as a teaching tool.

### Impact Analysis

The prior EIRs determined that the proposed land use designations, mobility network changes, and future development would result in potentially significant direct and indirect impacts to paleontological resources. The discussion of impacts on paleontological resources from implementation of the 2011 General Plan and FCI GPA can be found in Section 2.5.3.3 of the prior EIRs and is hereby incorporated by reference.

The prior EIRs determined that the proposed land use designations, mobility network changes, and future development would result in less than significant direct and indirect impacts to unique geology. The discussion of impacts on unique geology from implementation of the 2011 General Plan and FCI GPA can be found in Sections 2.6.3.6 and 3.2 of the prior EIRs and is hereby incorporated by reference.

The prior EIRs concluded that implementation of the 2011 General Plan and FCI GPA and subsequent projects would have the potential to directly or indirectly destroy a unique paleontological resource or site. In addition, implementation of the 2011 General Plan and FCI GPA would have the potential to contribute to potentially significant cumulative impacts to paleontological resources. Impacts were determined by the prior EIRs to be less than significant with implementation of mitigation measures and General Plan policies. The General Plan includes one goal, COS-9, which requires that paleontological resources and unique geological features be conserved for educational and scientific purposes. Policy COS-9.1 supports this goal by requiring the salvage and preservation of unique paleontological resources that are exposed by excavation, grading activities, or other developmental practices.

Two major components of the proposed project are the increased density of dwelling units and the expansion or reconfiguration of existing roadways in the Alpine CPA. Impacts to paleontological resources generally occur as a result of the physical destruction of fossil remains by excavation or trenching activities that require cutting into the underlying geologic formations. The increase in density could equate to greater ground disturbance. As such, construction activities resulting from implementation of the proposed project could potentially damage or destroy fossils in the underlying rock units. The analysis below focuses on what the change to the environment would be when the allowed number of dwelling units is increased by 2,013 under the proposed project.

Figures 2.5-2a and 2b identifies regions of the Alpine CPA that are sensitive for paleontological resources. Only Subarea 2 has a moderate sensitivity for producing paleontological resources; the other subareas have no sensitivity for producing unique paleontological resources. As discussed in Section 2.5.1.2, geologic formations with low, marginal, and moderate potential for paleontological resources are relatively unlikely to produce unique paleontological resources. However, paleontological resources can be encountered in these formations and, when they are, they are likely to be significant. Therefore, ground-disturbing activities in regions with low, marginal, or moderate sensitivity have the potential to damage or destroy paleontological resources that may be present below the ground surface. Because Subarea 2 would be permitted to have more dwelling units under the proposed project, the proposed project represents a more significant impact to paleontological resources than was identified and analyzed in the prior EIRs.



The proposed project would have moderate and high sensitivity for the presence of unique geology. Moderate sensitivity is identified adjacent to Subarea 4 and within Subarea 7 (see Figures 2.5-3a, 3b, and 3c). High sensitivity for unique geology is identified in the western portion of Subarea 7 (south of Interstate 8 bisecting Japatul Road). Ground-disturbing activities in regions with moderate or high sensitivity have the potential to damage or destroy unique geology. Because Subarea 4 would be permitted to have more dwelling units under the proposed project, the proposed project represents a more significant impact to paleontological resources than was identified and analyzed in the prior EIRs.

Unknown paleontological resources have the potential to occur within the Alpine CPA, especially in the more sensitive areas of Subarea 2, where the permitted number of dwelling units would increase. These unknown resources could be uncovered and damaged during project construction activities such as grading, excavation, and utilities installation. Exposed and recorded paleontological resources and unique geology could also be indirectly impacted by dust and erosion associated with construction activities. Loss or alteration of paleontological resources or unique geology could result in an irreversible loss of significant information that would be obtained from these non-renewable resources, which would be considered a significant impact. As such, implementation of the proposed project has the potential to result in significant impacts on known and unknown paleontological resources and unique geology.

The proposed project would allow for an increased number of dwelling units in Subareas 2, 4, and 6, and new, expanded and reconfigured roadways. Future development of dwelling units or infrastructure in the Alpine CPA would be subject to environmental review, federal, state, and local regulations, and the General Plan. However, the impact to paleontological resources and unique geology is considered potentially significant because it could directly or indirectly impact paleontological resources and unique geology to a greater degree than was analyzed by the prior EIRs.

### ***Federal, State, and Local Regulations and Existing Regulatory Processes***

Several federal, state and local regulations identified in Section 2.5.2, *Regulatory Framework*, that are applicable to the Alpine CPU protect paleontological resources. These include PRC Section 5097, the County Grading and Clearing Ordinance, and CEQA.

PRC Section 5097 and California Penal Code Section 622.5 make it a misdemeanor criminal violation to disturb or remove paleontological resources without authorization.

The County Grading and Clearing Ordinance requires a paleontological monitor to be present during grading or excavation activities at the discretion of the County, mandates the suspension of grading operations upon the discovery of fossils greater than 12 inches in any dimension, and gives the County Official the authority to determine the appropriate resource recovery operations, which must be carried out prior to the County Official's authorization to resume normal grading operations.

In addition, the County General Plan includes policy COS-9.1 within the Conservation Element, which requires the preservation of exposed unique paleontological resources in order to minimize impacts on paleontological resources. The prior EIRs also identified mitigation measures Cul-3.1 and Cul-3.2, which address impacts to paleontological resources and would be applicable to the proposed project. These mitigation measures are further discussed in Section 2.5.6.

Finally, CEQA requires that discretionary projects be reviewed to determine whether they have the potential to impact paleontological resources. This review process includes a records search, and in certain cases the County staff may require the developer to implement a paleontological monitoring program pursuant to the County's Guidelines for Determining Significance - Paleontological Resources.

## Summary

Increased numbers of dwelling units and roadway expansions and reconfigurations implemented under the proposed project may impact paleontological resources, including unique geology, in the Alpine CPA. Certain regions of the Alpine CPA have a higher potential for the presence of paleontological resources (Subarea 2) or unique geology (Subarea 7); as such, there may be more impacts with implementation of the proposed project. While the Alpine CPU does not include any goals or policies related to paleontological resources, General Plan policies COS-9.1 and COS-9.2 are designed to reduce impacts to paleontological resources and unique geology. Other federal, state, and local regulations, in addition to the County's environmental review process, also protect paleontological resources. However, the proposed project increases densities within the Alpine CPA beyond those analyzed in the 2011 General Plan and FCI GPA, which may impact known and unknown paleontological sites and unique geology within the Alpine CPA to a greater degree than those analyzed in the prior EIRs. Therefore, impacts to paleontological resources, including unique geology, would be **potentially significant**, and mitigation is required (**Impact-CUL-3**).

### 2.5.3.4 *Issue 4: Human Remains*

#### Guidelines for the Determination of Significance Analysis

The proposed project would have a significant impact if project activities would disturb any human remains, Native American or otherwise, including those interred outside of formal cemeteries. Section 15064.5(d) and (e) of the State CEQA Guidelines assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. These procedures are detailed under PRC Section 5097.98.

#### Impact Analysis

The prior EIRs determined that the proposed land use and mobility changes and future development would result in potentially significant direct and indirect impacts on human remains due to the potential for human burial sites (known or unknown) within the unincorporated County. The discussion of impacts on human remains from implementation of the 2011 General Plan and FCI GPA can be found in Section 2.5.3.4 of the prior EIRs and is hereby incorporated by reference.

The prior EIRs concluded that implementation of the 2011 General Plan and FCI GPA would have the potential to disturb human remains, including those located outside of formal cemeteries. In addition, implementation of the 2011 General Plan and FCI GPA would have the potential to contribute to potentially significant cumulative impacts associated with the disturbance of human remains. Impacts were determined to be less than significant with implementation of mitigation measures and General Plan policies that require compliance with regulations and procedures for the proper treatment of human remains if discovered. Specifically, General Plan policy COS-7.5 requires that human remains be treated with the utmost dignity and respect and that all handling of human remains must be done in consultation with the MLD and in accordance with federal, state, and local regulations. A mitigation measure from the prior EIRs, Cul-4.1, also establishes proper processes for treating human remains.

In addition to a proposed increase in density, the Alpine CPU proposes the expansion and reconfiguration of road networks within the Alpine CPA. Future development associated with the proposed project would have the potential to result in impacts on unknown human remains. Ground-disturbing activities associated with the land use designation and mobility changes, such as grading, excavation, and utilities installation, would have the potential to directly adversely impact unknown human remains, particularly

in Subareas 2, 4, and 6, where increased density is proposed, and where mobility changes are proposed. The analysis below focuses on what the change to the environment would be when the allowed number of dwelling units is increased by 2,013 under the proposed project.

Native American consultation began on June 12, 2017, when the County conducted outreach with seven tribes (Barona, Campo, Jamul, Kwaaymii, Santa Ysabel, Sycuan, and Viejas) for purposes of AB-52 consultation. On June 14, 2017, a request was submitted to the NAHC for information on documented Native American resources. Although a Sacred Lands File search was not conducted, the NAHC provided a list of 13 local tribal governments to the County for purposes of SB-18 consultation.

On August 15, 2017, County staff conducted outreach with 13 local tribal governments (Barona, Campo, Ewiiapaayp, Inaja, Jamul, Kwaaymii, La Posta, Manzanita, Mesa Grande, San Pasqual, Santa Ysabel, Sycuan, and Viejas) that the NAHC identified requesting whether they want to participate in tribal consultation on the proposed project pursuant to SB-18. Three tribes responded (Barona, Jamul, and Santa Ysabel) declining consultation and deferred to the Viejas Band. Viejas requested formal consultation. County staff met with Viejas on October 24, 2017. Viejas was informed that the project is a policy document. They raised no issues and consultation was concluded. Viejas did, however, request to be included in notifications for public review and hearings, and that they be consulted on subsequent projects. The San Pasqual Band was notified of the project on February 3, 2020, and declined consultation because the “project is a GPA and not an actual development project.” The results of the tribal outreach did not yield the identification of any known human remains within the Alpine CPA.

There may be unknown human remains in the Alpine CPA that may be indirectly or directly disturbed by future projects implemented under the Alpine CPU. Impacts to human remains may be direct, such as any disturbance resulting from construction activities including grading or excavation, or indirect, such as increased human encroachment. Any disturbance would be considered a significant impact.

The proposed project would allow for a greater density and increase the number of dwelling units in Subareas 2, 4, and 6. In addition, it would allow for new and expanded roadways in the Alpine CPA. Future development would be subject to federal, state, and local laws, and be expected to conform to the General Plan goals and policies, which would reduce impacts to human remains in the CPA. The potential for disturbance may also be reduced through surveying potential development sites prior to any ground-disturbing activities to determine the absence and/or presence of human remains, reviewing archaeological records to determine whether human remains are known to occur in the area, and/or designing future development to avoid areas where burials may be present. Despite these regulations and precautions, and the increased density and expanded mobility network proposed in the Alpine CPA, the proposed project would cause a more severe significant impact related to human remains compared to the impact identified within the prior EIRs because of the increased density of dwelling units and expanded mobility network. As such, the proposed project’s impact to human remains would be considered **potentially significant**.

### *Federal, State, and Local Regulations and Existing Regulatory Processes*

As identified in Section 2.5.2, *Regulatory Framework*, there are numerous federal, state, and local regulations in place to protect human remains in San Diego County that are also applicable to the proposed project. New projects proposed after the implementation of the Alpine CPU would be required to comply with all applicable regulations pertaining to human remains, such as NAGPRA, Cal NAGPRA, PRC Section 5097, and the County’s RPO.

NAGPRA requires the repatriation of funerary or religious items held by federal agencies or federally funded museums, or removed from federal land, to the American Indians of demonstrated lineal descent. Cal NAGPRA requires the repatriation of such items from state agencies, museums, and lands.

Native American human burials have specific provisions for treatment in PRC Section 5097, as amended by Assembly Bill 2641. Section 5097.98 addresses the disposition of Native American burials, protects such remains, and establishes the NAHC to resolve any related disputes.

California HSC Section 7050.5 has specific provisions for the protection of human burial remains, Native American or otherwise. HSC Section 7050.5 requires that, in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there can be no further excavation or disturbance of the site, or any nearby area reasonably suspected to overlay adjacent remains, until the County Coroner has examined the remains. In addition, any person who mutilates or disinters, wantonly disturbs, or willfully removes human remains in or from any location other than a dedicated cemetery without authority of the law is guilty of a misdemeanor criminal offense.

CEQA Section 15064.5 (d), (e), and (f) also outline the actions that should be taken when human remains are discovered. According to this Section, once human remains are discovered, no further disturbance of a site or any nearby area reasonably suspected to overlie adjacent human remains is permitted until the coroner is consulted and is able to contact the NAHC and the MLD to determine the suitable manner of treatment and disposition of the remains.

Furthermore, the General Plan includes policy COS-7.5 within the Conservation Element, which requires the proper treatment of human remains including notifying and consulting with the MLD to determine the most respectful manner to handle the remains. The prior EIRs identified mitigation measures addressing impacts related to human remains that would be applicable to the proposed project, including Cul-1.1, Cul-1.6, Cul-2.3, Cul-2.4, Cul-2.5, and Cul-4.1, which are described in Section 2.5.6.

Any development projects undergoing environmental review may also be subject to consultation pursuant to SB-18 and AB-52, which are described in Section 2.5.2. During the environmental review of any future project implemented under the proposed project which is subject to consultation, tribal representatives will have the opportunity to identify areas that may be sensitive for human remains, in which case the County would recommend that the developer avoid the area as part of the project design.

### *Summary*

The proposed project would increase densities within the Alpine CPA, particularly in Subareas 2, 4, and 6. In additional, the proposed project allows for expanded mobility networks, which may add or reconfigure roadways. The Alpine CPU does not include any goals or policies related to human remains, but General Plan policies Cul-1.1, Cul-1.6, Cul-2.3, Cul-2.4, Cul-2.5, and Cul-4.1 protect human remains within San Diego County. Several other federal, state, and local regulations also protect human remains from development-related impacts. The proposed project increases densities within the CPA beyond those established in the General Plan, which may impact unknown human remains within the Alpine CPA to a greater degree than was analyzed in the prior EIRs. Therefore, impacts to human remains would be **potentially significant**, and mitigation is required (**Impact-CUL-4**).

## **2.5.4 Cumulative Impact Analysis**

The geographic scope of the cumulative impact analysis for cultural and paleontological resources varies depending on the type of resource with potential to be impacted. While the proposed project is for the most part limited to four of seven subareas, the geographic scope for the cumulative analysis of cultural

resources and paleontological resources for this EIR is the entire Alpine CPA. This is because development activities that increase impacts to surface or subsurface historical resources, archaeological resources, paleontological resources, or human remains within the subareas of the proposed project may degrade these resources in surrounding locations of the Alpine CPA.

The geographic scope for cumulative effects to paleontological resources extends to other Upper Jurassic and Lower Cretaceous Marine and Nonmarine, Cretaceous Nonmarine, and Quaternary Alluvium formations in the surrounding communities of Crest/Dehesa, Lakeside, Cuyamaca, Descanso, Pine Valley, and Jamul/Dulzura and the Viejas reservation. These communities will also be included in the geographic scope for cumulative impacts to historical resources, archaeological resources, and human remains. Cumulative impacts to archaeological resources and human remains will also be considered for other jurisdictions outside of the County where tribes may feel a connection or stewardship towards archaeological resources and human remains located within the Alpine CPA.

#### **2.5.4.1      *Issue 1: Historical Resources***

A cumulative impact would occur on historical resources if future development associated with cumulative projected growth within the Alpine CPA would alter or damage a historical resource to the degree that it changes the significance of the resource. Future growth within the Alpine CPA and its associated impacts may result in the physical demolition, relocation, alteration, or degradation of a historical resource during construction or grading activities for a development project. Any impacts to historical resources that may occur as a result of projects relying on the Alpine CPU could cumulatively impact our historical knowledge of San Diego County, including Alpine's neighboring communities. An impact to historical resources in Alpine could result in a loss of information about important events, persons, or architectural styles that may impede the recognition of broader historically significant patterns throughout the region and prevent historical resources in other parts of San Diego County, such as Alpine's neighboring communities, from being recognized as significant.

Similarly, development projects in surrounding communities could impact historical resources and, as a result, cause a loss of knowledge about the Alpine CPA, potentially resulting in a change in the significance in Alpine's historical resources. Cumulative projects that would have the potential to result in adverse impacts to historical resources include future private development projects and the development of land use designations under surrounding jurisdictions' general plans. Projects in neighboring communities under the County's jurisdiction would still have to comply with the federal, state, and local regulations listed in Section 2.5.2, but future projects on the Viejas reservation are not subject to compliance with all such regulations. Even with regulations in place, individual historical resources could still be impacted by future development activities and could potentially cause a significant cumulative impact related to historical resources.

As described in Section 2.5.3.1, the land use designation and mobility network changes within the proposed project would have the potential to physically demolish, destroy, relocate, or alter historical resources or their immediate surroundings. Although the cumulative projected growth and development must comply with existing regulations and policies, historical resources could potentially be adversely impacted. This could change the significance of these historical resources, which would constitute a significant impact to historical resources. Therefore, cumulative impacts from future growth and development within the cumulative study area would result in a **potentially significant cumulative impact** and mitigation would be required (**Impact-C-CUL-1**).

### **2.5.4.2      *Issue 2: Archaeological Resources***

Future growth and development within the Alpine CPA would have the potential to change the significance of archaeological resources if it could lead to the destruction or disturbance of an archaeological site. Impacts to archaeological resources within four of the seven subareas and the larger Alpine CPA may occur as a result of grading or construction activities during project development implemented under the Alpine CPU. Any project subsequent to the Alpine CPU that impacts archaeological resources would adversely impact our understanding of the cultural history of the region and our ability to interpret other archaeological resources within it. This could lead to the misrecognition of the significance of archaeological resources in neighboring communities because the loss of one resource would mean a loss of understanding of and connection between nearby archaeological resources.

Impacts to archaeological resources caused by development or increased human encroachment in other communities could similarly create a loss of knowledge that subsequently impacts the significance of archaeological resources within the Alpine CPA. Cumulative projects that would have the potential to result in adverse impacts to archaeological resources include future private development projects and the development of land use designations under surrounding jurisdictions' general plans. Projects in neighboring communities under the County's jurisdiction would still have to comply with the federal, state, and local regulations listed in Section 2.5.2, but future projects on the Viejas reservation are not subject to compliance with all such regulations. Even with regulations in place, individual archaeological resources could still be impacted by future development activities and could potentially cause a significant cumulative impact related to historical resources.

As described above in Section 2.5.3.2, the proposed project would increase development and population density beyond what was anticipated in the prior EIRs. Although any future development projects would be required to comply with federal, state and local regulations that protect archaeological resources, these resources could still be adversely impacted. Impacts to archaeological resources are difficult to mitigate because these resources may have cultural and religious value that is not accounted for in the data recovery and monitoring programs specified in these regulations. As such, the proposed project would cause a greater impact to archaeological resources compared to the 2011 General Plan and FCI GPA because of the proposed increase in allowed density and the proposed expansion of the mobility network. In combination with projects that may be proposed subsequent to the Alpine CPU, the proposed project would have a **potentially significant cumulative impact** and mitigation would be required (**Impact-C-CUL-2**).

### **2.5.4.3      *Issue 3: Paleontological Resources***

Future development projects located within the Alpine CPA would have the potential to result in a cumulative impact to paleontological resources, including unique geology, due to grading, excavation, or other ground-disturbing activities that may disturb these resources. In addition, if a future project that requires excavation or grading is located in an area of low, marginal, or moderate sensitivity, or an area with a high or moderate potential to produce unique geology, there would be an increased potential for an adverse impact to paleontological resources. Furthermore, the proposed project may have a cumulative impact on paleontological resources, including unique geology, within the entire Alpine CPA and neighboring communities with Upper Jurassic and Lower Cretaceous Marine and Nonmarine, Cretaceous Nonmarine, and Quaternary Alluvium formations in San Diego County, as any information lost due to subsequent projects in the Alpine CPA will equate to a loss of information about all such formations in the region.

Any future development projects in neighboring communities that could disturb paleontological resources, including unique geology, particularly projects in areas of known sensitivity for paleontological resources and unique geology, could subsequently impact the significance of paleontological resources within the Alpine CPA. Cumulative projects that would have the potential to result in adverse impacts to paleontological resources include future private development projects and the development of land use designations under surrounding jurisdictions' general plans. Projects in neighboring communities under the County's jurisdiction would still have to comply with the federal, state, and local regulations listed in Section 2.5.2, but future projects on the Viejas reservation are not subject to compliance with all such regulations. Even with regulations in place, individual paleontological resources, including unique geology, could still be impacted by future development activities and could potentially cause a significant cumulative impact related to paleontological resources and unique geology.

As described above in Section 2.5.3.3, the proposed land use designation changes and modifications to the mobility network could result in significant impacts to paleontological resources and unique geology in the Alpine CPA, which could subsequently impact the significance of paleontological resources in neighboring communities. Although all future development projects within the Alpine CPA will be required to follow federal, state, and local regulations that are designed to protect paleontological resources, there may still be significant cumulative impacts to paleontological resources and unique geology within the Alpine CPA and in neighboring communities. Therefore, future proposed development would result in a **potentially significant cumulative impact** and mitigation would be required (**Impact-C-CUL-3**).

#### **2.5.4.4      *Issue 4: Human Remains***

Future growth and development within the Alpine CPA would have the potential to result in impacts on human remains due to grading, excavation, or other ground-disturbing activities. It is difficult to circumscribe the potential effects of any impacts on human remains within the Alpine CPA because of their potential to hold profound cultural, ideological, and religious significance. Any project subsequent to the Alpine CPU that impacts human remains would cumulatively impact not only Alpine but also neighboring communities. Such impacts negatively impact our understanding of the cultural history of the San Diego County and may lead to the misrecognition of areas that are sensitive for human remains in other parts of the County.

Future development in neighboring communities could impact human remains, which would be considered a cumulative significant impact to human remains in the Alpine CPA as well. Cumulative projects that would have the potential to result in adverse impacts to human remains include future private development projects and the development of land use designations under surrounding jurisdictions' general plans. Projects in neighboring communities under the County's jurisdiction would still have to comply with the federal, state, and local regulations listed in Section 2.5.2, but future projects on the Viejas reservation are not subject to compliance with all such regulations. Even with regulations in place, human remains could still be impacted by future development activities and could potentially cause a significant cumulative impact related to human remains.

As discussed in Section 2.5.3.4, although there are no known human remains within the Alpine CPA, implementation of the proposed project would have the potential to disturb unknown human remains, including those located outside of formal cemeteries, from ground-disturbing activities associated with the future development of land uses. All future development projects will be subject to federal, state, and local regulations governing the treatment of human remains, but impacts to human remains are difficult to mitigate because these resources may have cultural and religious value that is not accounted for in the

data recovery and monitoring programs specified in these regulations. Because land use designations and mobility network changes associated with the Alpine CPU allow for greater development than was allowed by the General Plan, the proposed project would have a greater impact on human remains than was analyzed by the prior EIRs. As such, in combination with other cumulative projects, the proposed project would result in a **potentially significant cumulative impact** and mitigation would be required (**Impact-C-CUL-4**).

### 2.5.5 Significance of Impacts Prior to Mitigation

The proposed project and the cumulative effects of the proposed project in conjunction with subsequent projects in the Alpine CPA would result in potentially significant direct and cumulative impacts to historical resources, archaeological resources, paleontological resources, and human remains.

**Impact-CUL-1: Cause a Substantial Adverse Change in the Significance of a Historical Resource.** Due to increased development densities proposed in the Alpine CPA, the proposed project would cause a more severe potentially significant impact related to historical resources compared to the prior EIRs. This would be considered a significant impact.

**Impact-CUL-2: Cause a Substantial Adverse Change in the Significance of an Archaeological Resource.** Due to increased development densities proposed in the Alpine CPA, the proposed project would cause more severe potentially significant impacts related to archaeological resources compared to the prior EIRs. This would be considered a significant impact.

**Impact-CUL-3: Result in the Direct or Indirect Destruction of a Unique Paleontological Resource.** Due to increased development densities proposed in the Alpine CPA, the proposed project would cause more severe potentially significant impacts related to paleontological resources and unique geology compared to the prior EIRs. This would be considered a significant impact.

**Impact-CUL-4: Disturb Human Remains.** Due to increased development densities proposed in the Alpine CPA, the proposed project would cause more severe potentially significant impacts related to human remains compared to the prior EIRs. This would be considered a significant impact.

**Impact-C-CUL-1: Result in a Cumulatively Considerable Contribution to a Substantial Adverse Change in the Significance of a Historical Resource.** The proposed project would cause a more severe potentially significant impact related to historical resources compared to the prior EIRs. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.

**Impact-C-CUL-2: Result in a Cumulatively Considerable Contribution to a Substantial Adverse Change in the Significance of an Archaeological Resource.** The proposed project would cause a more severe potentially significant impact related to archaeological resources compared to the prior EIRs. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.

**Impact-C-CUL-3: Result in a Cumulatively Considerable Contribution to the Direct or Indirect Destruction of a Unique Paleontological Resource.** The proposed project would cause a more severe potentially significant impact related to paleontological resources compared to the prior EIRs. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.

**Impact-C-CUL-4: Result in a Cumulatively Considerable Contribution to the Disturbance of Human Remains.** The proposed project would cause a more severe potentially significant impact related to human remains compared to the prior EIRs. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.



## 2.5.6 Mitigation

### 2.5.6.1 *Issue 1: Historical Resources*

As discretionary projects are submitted, CEQA review would be completed, which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. In addition, the following prior EIRs and Alpine CPU specific mitigation measures would reduce (**Impact-CUL-1** and **Impact-C-CUL-1**) impacts to historical resources, to less than significant.

#### 2011 General Plan and FCI EIR Mitigation Measures

The following prior EIRs mitigation measures are being carried forward and shall apply to the proposed project: Cul-1.1 through Cul-1.8 (see Appendix B, General Plan EIR Mitigation Measures). Implementation of these mitigation measures would reduce the proposed project's impacts on historical resources.

#### Alpine CPU Mitigation Measures

**MM-CUL-1:** Important historic resources in the Alpine Plan area shall be protected through utilization of dedicated open space.

**MM-CUL-2:** Support the preparation of an inventory of significant historical landmarks in Alpine.

**MM-CUL-3:** As a part of the discretionary review of subsequent projects proposed under the Alpine CPU, County staff shall review proposed projects to determine if any potentially historical significant resource is present on site. If it is determined that potentially significant historical resources are present on site, compliance with the County's Guidelines for Determining Significance – Cultural Resources: Archaeological and Historic Resources, shall be required. This may require, pursuant to County Planning & Development Services (PDS) staff determination, the preparation of a technical report or memorandum that would evaluate the historical significance of the resource and identify appropriate mitigation measures, as required.

### 2.5.6.2 *Issue 2: Archaeological Resources*

As discretionary projects are submitted, CEQA review would be completed, which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. In addition, the following prior EIRs and Alpine CPU specific mitigation measures would reduce (**Impact-CUL-2** and **Impact-C-CUL-2**) impacts to archaeological resources, to less than significant.

#### 2011 General Plan and FCI EIR Mitigation Measures

The following prior EIRs mitigation measures are being carried forward and shall apply to the proposed project: Cul-2.1 through Cul-2.6 (see Appendix B, General Plan EIR Mitigation Measures). Implementation of these mitigation measures would reduce the proposed project's impacts on archaeological resources.

#### Alpine CPU Mitigation Measures

**MM-CUL-4:** Important archaeological resources in the Alpine Plan area shall be protected through utilization of dedicated open space.

**MM-CUL-5:** As a part of the discretionary review of subsequent projects proposed under the Alpine CPU, County staff shall review proposed projects to determine if an archaeological resource as defined by PRC Section 21083.2, State CEQA Guidelines Section 15064.5(a), and the RPO has the potential to be located

on site. If it is determined that an archaeological resource has the potential to be located on site, compliance with the County's Guidelines for Determining Significance – Cultural Resources: Archaeological and Historic Resources, shall be required. This may require, pursuant to County PDS staff determination, the preparation of a technical report or memorandum that would evaluate the significance of the resource and identify appropriate mitigation measures.

### ***2.5.6.3 Issue 3: Paleontological Resources***

As discretionary projects are submitted, CEQA review would be completed to determine the type of project-specific paleontological monitoring or mitigation that may be required. In addition, the following prior EIRs and Alpine CPU-specific mitigation measures would reduce (**Impact-CUL-3 and Impact-C-CUL-3**) impacts to paleontological resources and unique geology, to less than significant.

#### **2011 General Plan and FCI EIR Mitigation Measures**

The following prior EIRs mitigation measures are being carried forward and shall apply to the proposed project: Cul-3.1 through Cul-3.2 (see Appendix B, General Plan EIR Mitigation Measures). Implementation of these mitigation measures would reduce the proposed project's impacts on paleontological resources.

#### **Alpine CPU Mitigation Measures**

**MM-CUL-6:** Paleontological monitoring programs will be implemented for projects that are located within paleontological sensitive areas that include Subarea 2. The monitoring program will be implemented on a project-by-project basis and conform to all applicable federal, state, and local regulations and the County's Guidelines for Determining Significance - Paleontological Resources.

**MM-CUL-7:** As a part of the discretionary review of subsequent projects proposed under the Alpine CPU, County staff shall review proposed projects to determine if any unique geology is present on site. If it is determined that unique geology is present on site, compliance with the County's Guidelines for Determining Significance – Unique Geology, shall be required. This may require, pursuant to County PDS staff determination, incorporation of project design features and mitigation measures to reduce impacts.

### ***2.5.6.4 Issue 4: Human Remains***

As discretionary projects are submitted, CEQA review would be completed, which may require a formal study that would analyze impacts and identify project-specific mitigation measures to reduce impacts. In addition, the following prior EIRs and Alpine CPU specific mitigation measures, Cul-4 and Cul-5 identified above, would reduce (**Impact-CUL-4 and Impact-C-CUL-4**) impacts to human remains, to less than significant.

#### **2011 General Plan and FCI EIR Mitigation Measures**

The following prior EIRs mitigation measure is being carried forward and shall apply to the proposed project: Cul-4.1 (see Appendix B, General Plan EIR Mitigation Measures). Implementation of this mitigation measure would reduce the proposed project's impacts on human remains.

#### **Alpine CPU Mitigation Measures**

No additional mitigation measures are proposed.

## 2.5.7 Conclusion

### 2.5.7.1 *Issue 1: Historical Resources*

Implementation of the proposed project would result in increased future development in the Alpine CPA. This could result in greater adverse changes to the significance of known and unknown historical resources as compared to the impacts identified in the prior EIRs, which would be considered a potentially significant impact (**Impact-CUL-1**). The proposed project in conjunction with subsequent projects would result in a potentially significant cumulative impact (**Impact-C-CUL-1**). However, for the reasons described above, the application of existing regulations in combination with the County's RPO, Zoning Ordinance, the General Plan policies and mitigation measures, and the Alpine CPU mitigation measures described in 2.5.6.1, would mitigate direct and cumulative impacts to historical resources to a **less than significant** level and impacts would **not be cumulatively considerable**, similar to the prior EIRs.

### 2.5.7.2 *Issue 2: Archaeological Resources*

Implementation of the proposed project would allow increased development densities to occur in some areas of the Alpine CPA, which would potentially cause a more severe substantial adverse change in the significance of archaeological resources, including the destruction or disturbance of an archaeological site that contains or has the potential to contain information important to history or prehistory. Therefore, the proposed project would result in a greater impact on archaeological resources as compared to the prior EIRs, which would be considered a potentially significant impact (**Impact-CUL-2**). The proposed project in conjunction with subsequent projects would result in a potentially significant cumulative impact (**Impact-C-CUL-2**). However, for the reasons described above, the application of existing regulations in combination with the County's RPO, Zoning Ordinance, the General Plan policies and mitigation measures, and the Alpine CPU mitigation measures described in 2.5.6.2, would mitigate direct and cumulative impacts to archaeological resources to a **less than significant** level and impacts would **not be cumulatively considerable**, similar to the prior EIRs.

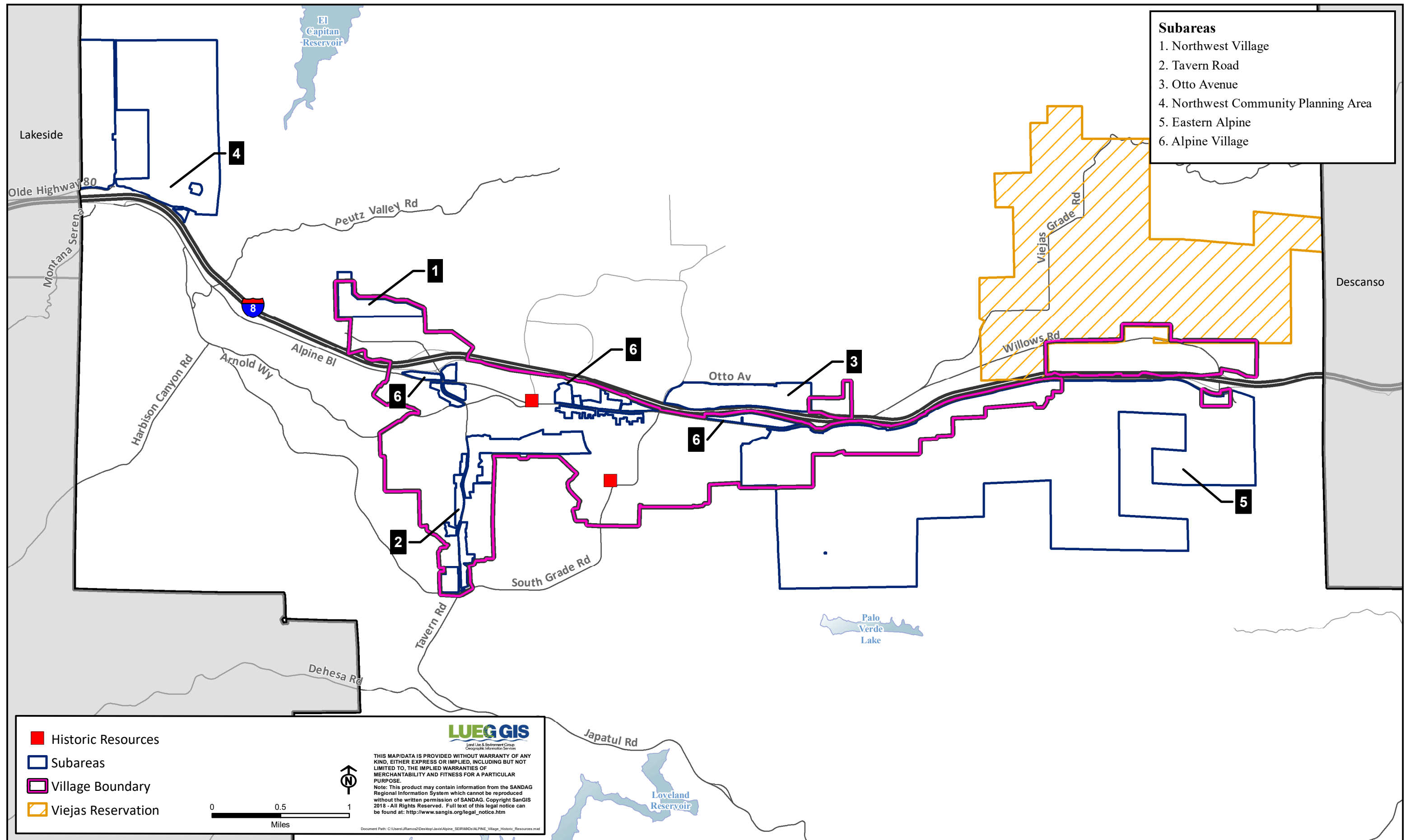
### 2.5.7.3 *Issue 3: Paleontological Resources*

Implementation of the proposed project would result in increased future development in areas of the Alpine CPA that are sensitive for the presence of paleontological resources and unique geology, which could potentially adversely impact unique paleontological resources. Therefore, the proposed project would result in a greater potential impact on paleontological resources and unique geology as compared to the prior EIRs (**Impact-CUL-3**). The proposed project in conjunction with subsequent projects would result in a potentially significant cumulative impact (**Impact-C-CUL-3**). However, for the reasons described above, the application of existing regulations in combination with the County's RPO, Zoning Ordinance, the General Plan policies and mitigation measures, and the Alpine CPU mitigation measures described in 2.5.6.3 would mitigate direct and cumulative impacts to paleontological resources to a **less than significant** level and impacts would **not be cumulatively considerable**, similar to the prior EIRs.

### 2.5.7.4 *Issue 4: Human Remains*

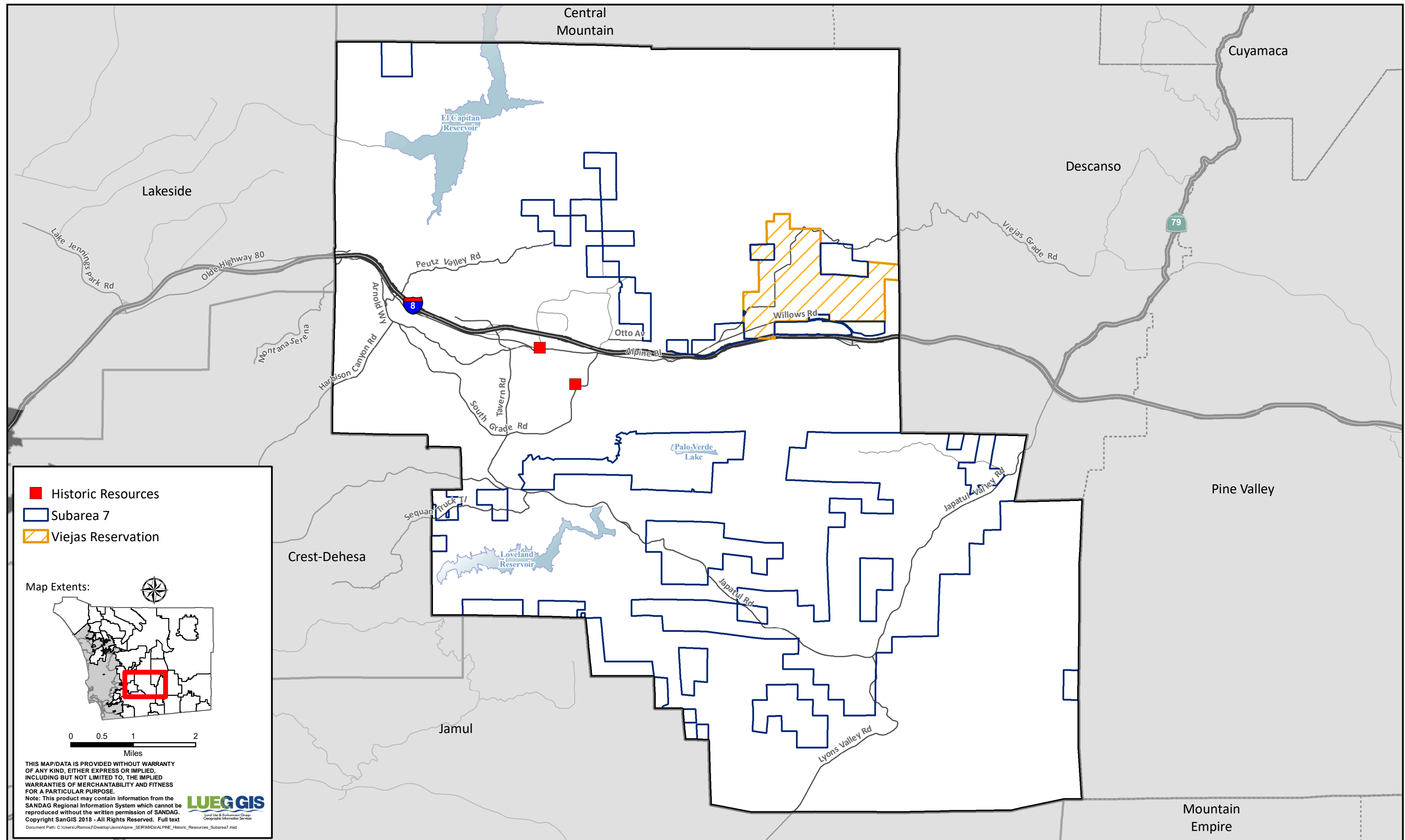
Implementation of the proposed project would result in increased new development in the Alpine CPA, which could disturb human remains, including those discovered outside of formal cemeteries. Therefore, the proposed project would result in a greater potential impact associated with human remains as compared to the prior EIRs (**Impact-CUL-4**). The proposed project in conjunction with subsequent projects would result in a potentially significant cumulative impact (**Impact-C-CUL-4**). However, for the

reasons described above, the application of existing regulations, in combination with the County's RPO, Zoning Ordinance, and the General Plan policies and mitigation measures, would mitigate direct and cumulative impacts on human remains to a **less than significant** level and impacts would **not be cumulatively considerable**, similar to the prior EIRs.



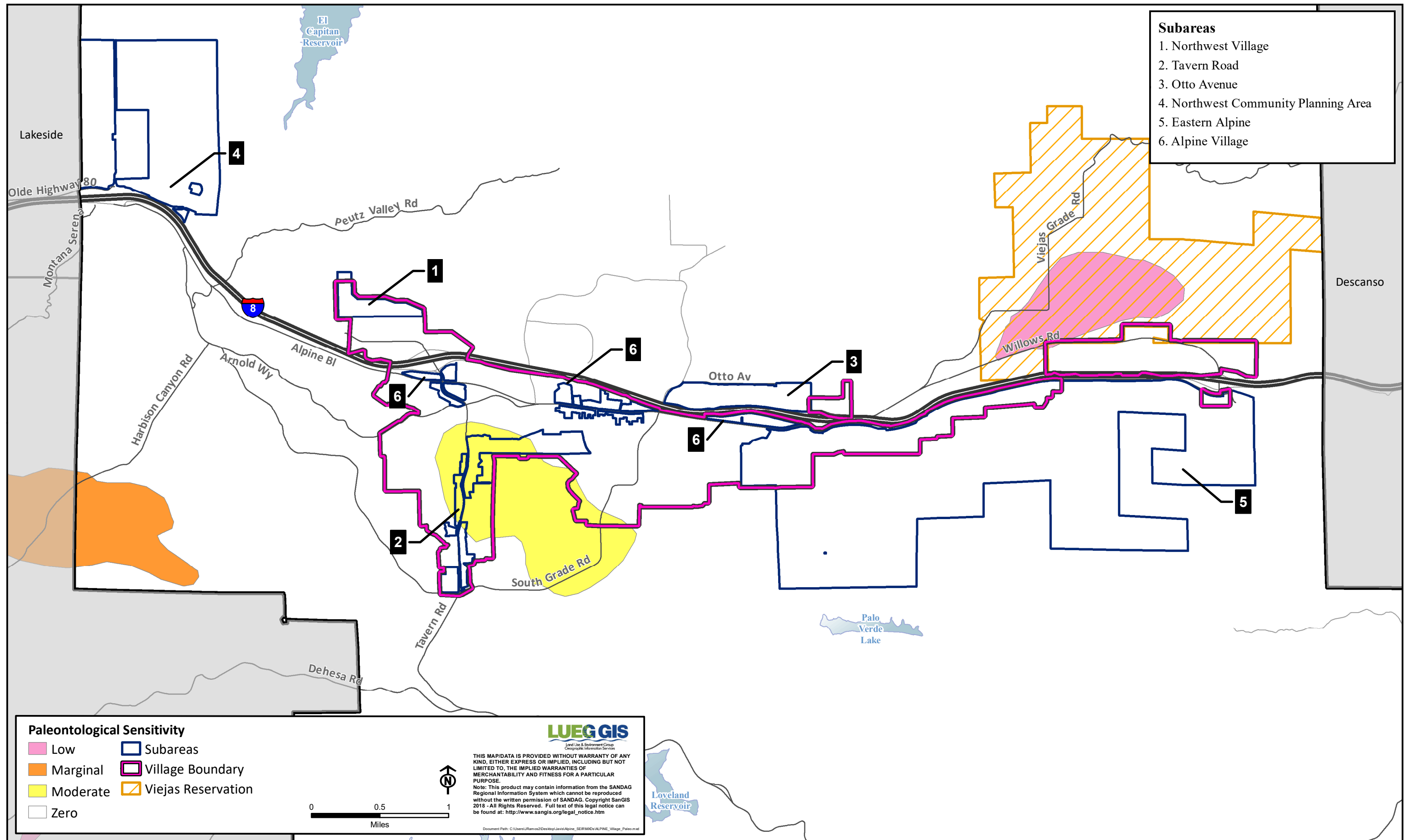
Source: SanGIS, County of San Diego, 2020

**Figure 2.5-1a**  
**Historic Resources**  
**Subareas 1-6**



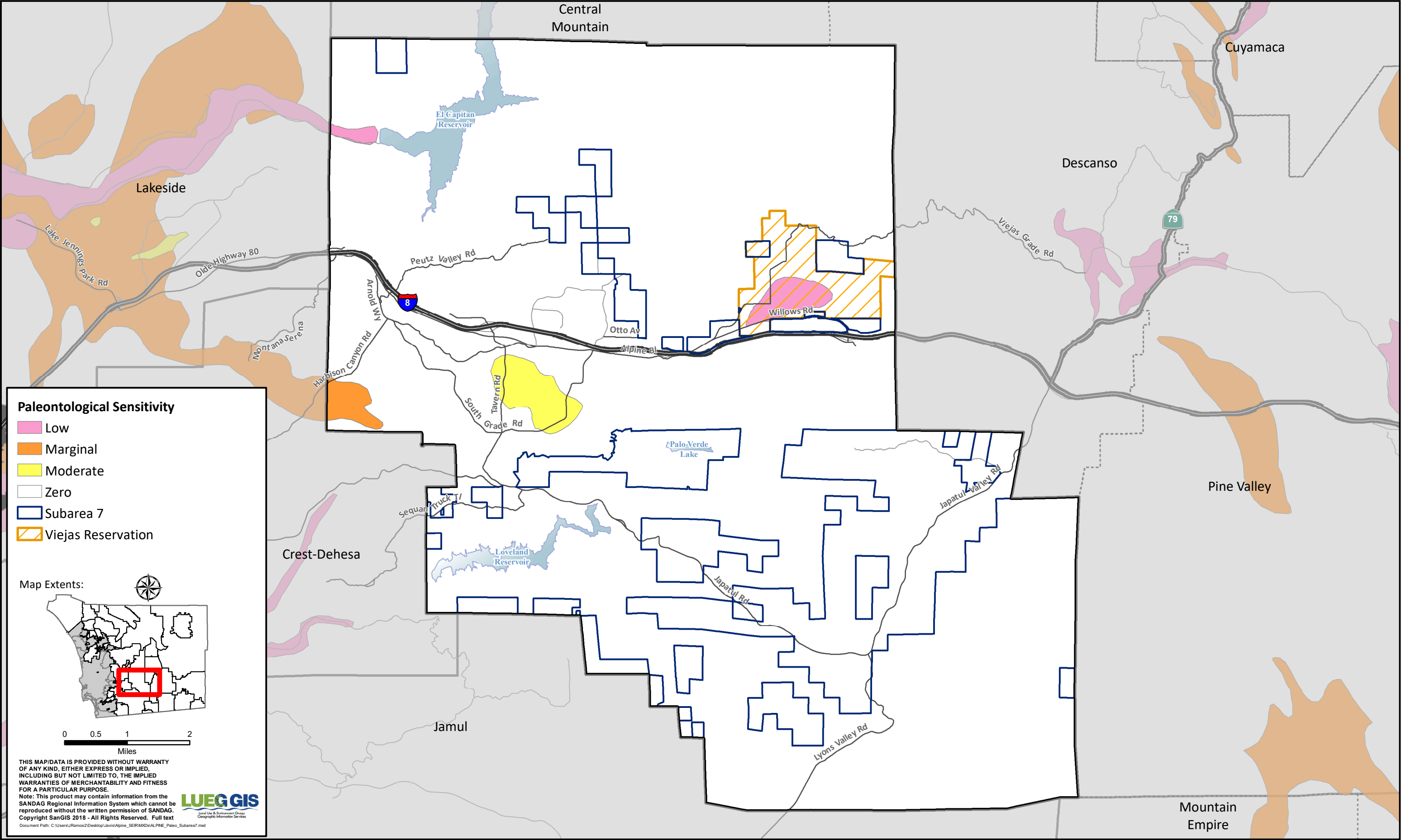
Source: SanGIS, County of San Diego, 2020

**Figure 2.5-1b**  
**Historic Resources**  
**Subarea 7**



Source: SanGIS, County of San Diego, 2019

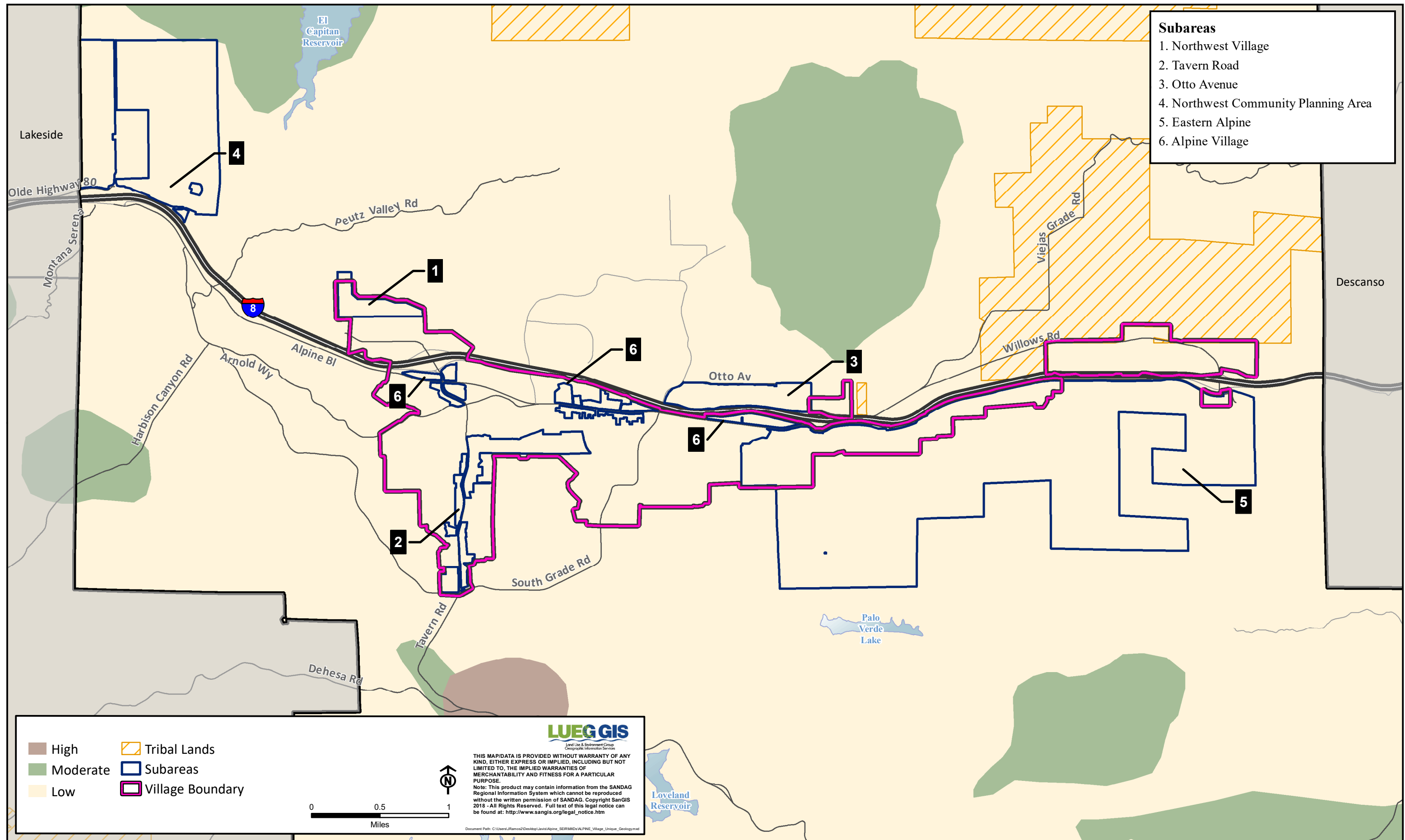
**Figure 2.5-2a**  
**Paleontological Sensitivity**  
**Subareas 1-6**



Source: SanGIS, County of San Diego, 2020

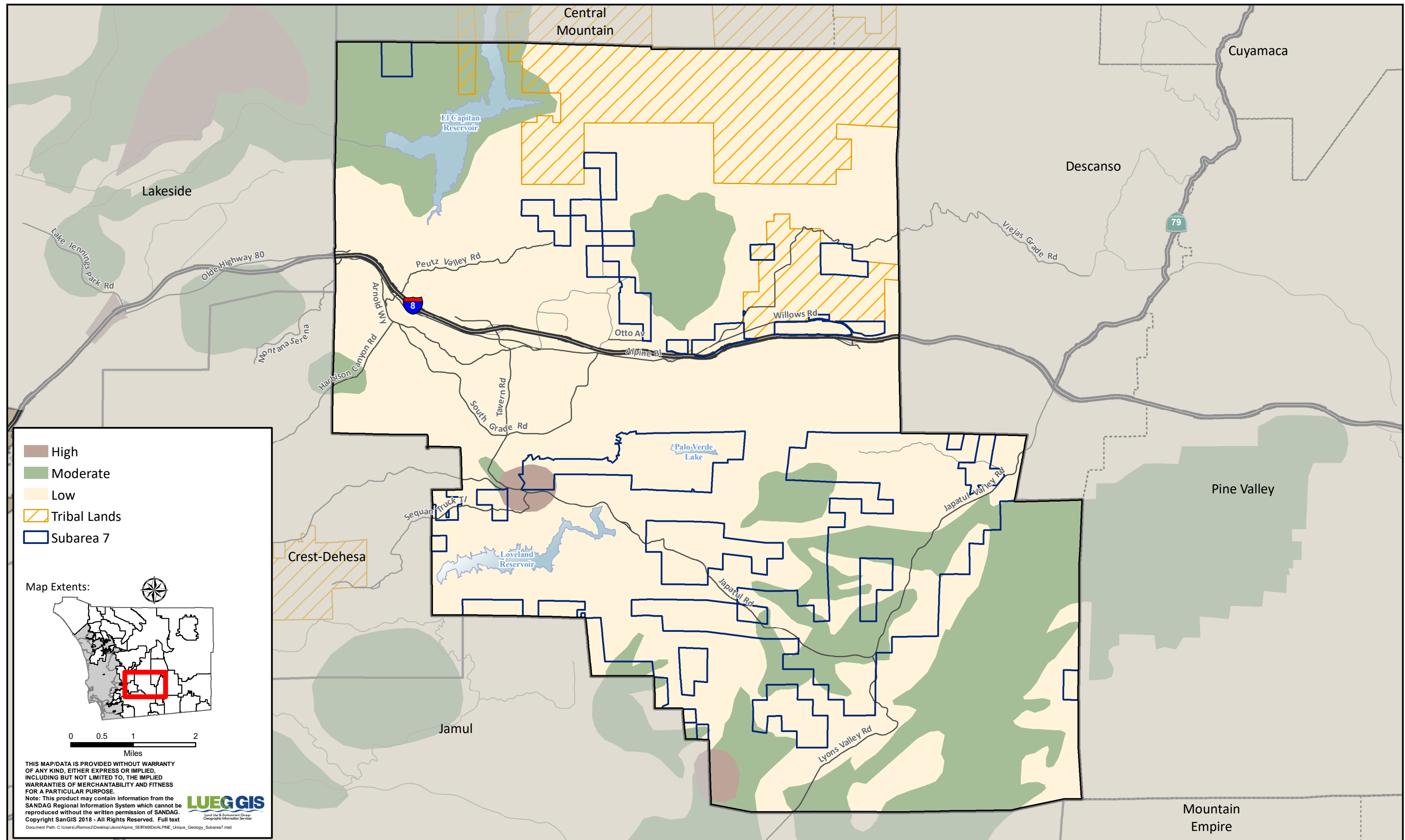
**Figure 2.5-2b**  
**Paleontological Sensitivity**  
**Subarea 7**





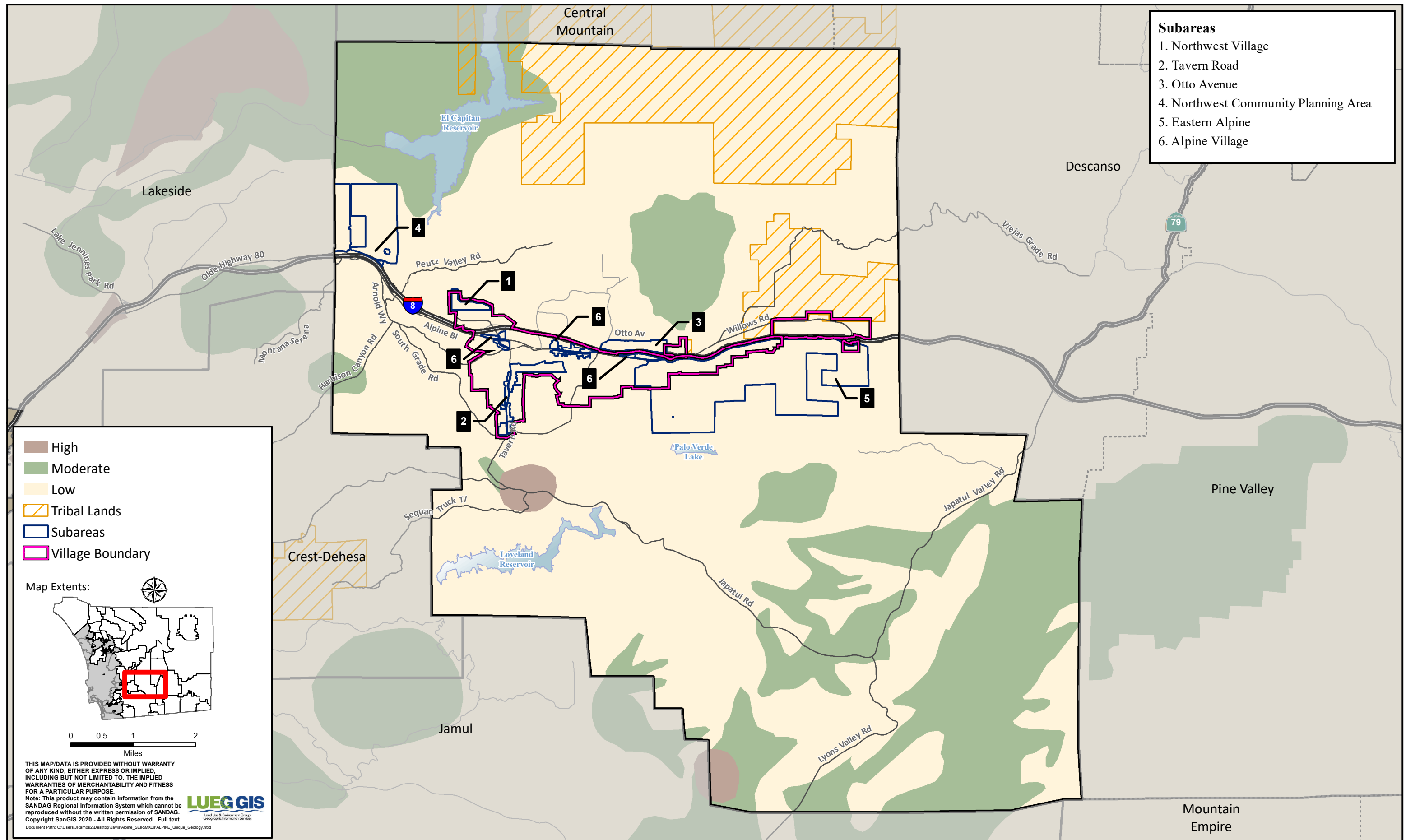
Source: SanGIS, County of San Diego, 2020

**Figure 2.5-3a**  
**Unique Geology**  
**Subareas 1-6**



Source: SanGIS, County of San Diego, 2019

**Figure 2.5-3b**  
**Unique Geology**  
**Subarea 7**



Source: SanGIS, County of San Diego, 2020

**Figure 2.5-3c**  
**Unique Geology**

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