2.4 Cultural Resources

This section analyzes cultural resources impacts from the Campo Wind Project with Boulder Brush Facilities (Project) within the Project Area, including off-site improvement areas, based on available reports and site-specific studies. Information provided in this section was incorporated from the Cultural Resources Report prepared for the Project (Appendix E). The Cultural Resources Report includes a Phase I inventory and a Phase II evaluation performed by Dudek between May 2017 and January 2019. The Phase I and Phase II studies covered the 2,953 acres that compose the Project's area of potential effects (Project APE); 753 acres, which includes the approximately 320-acre Boulder Brush Corridor, located on private land within the Boulder Brush Boundary (Boulder Brush APE), and approximately 2,200 acres, which comprises the Campo Corridor (Campo APE), located on land within the Campo Band of Diegueño Mission Indians Reservation (Reservation). The area of direct impact (ADI) that will be developed for construction and operations of the Project includes approximately 130 acres on private land (Boulder Brush ADI) and approximately 800 acres On-Reservation (Campo ADI). The Phase II portion of the study evaluates those archaeological sites within these ADIs. Confidential records and maps associated with Appendix E are on file with the Bureau of Indian Affairs (BIA) and at the County of San Diego Planning & Development Services, and have been deposited with the South Coastal Information Center (SCIC).

No comments were received in response to the Notice of Preparation regarding cultural resources. A copy of the Notice of Preparation and comment letters received in response to the Notice of Preparation are included in Appendix A of this Environmental Impact Report (EIR).

Tribal cultural resources (TCRs), as defined in the California Environmental Quality Act (CEQA), are analyzed in Section 2.7, Tribal Cultural Resources, of this EIR. The analysis presented in this section addresses each cultural resources topic.

2.4.1 Existing Conditions

Environmental Setting

The Project Site is situated on a series of northwest-southeast trending mountain ridges and the valleys between the ridges. The ridges are generally steep-sloped, with numerous heavily weathered granite bedrock outcrops exposed at all elevations. Elevations range from approximately 4,200 feet above mean sea level near the north end of the Project Site to 3,100 feet above mean sea level near the southwest end.

The Project is located in the eastern portion of the Peninsular Range Geomorphic Province of Southern California. The Peninsular Range Geomorphic Province is typified by northwest to southeast trending mountain ranges that parallel the trace of the San Andreas and related regional

fault system. The Peninsular Ranges are generally composed of the granitic Peninsular Ranges batholith and associated metamorphic rocks. West of the batholith, in the San Diego embayment, the Peninsular Range Geomorphic Province is composed of sedimentary rocks ranging from Late Cretaceous to Pleistocene in age (Appendix E).

The entirety of the Project Site is underlain by the Tonalite of La Posta (Appendix E), a granitic formation produced by the subduction of the Farallon Plate beneath the North American Plate, approximately 95 million years ago (MA). The Tonalite of La Posta is characterized by the abundant white-weathering plagioclase feldspars.

The climate is classified as Mediterranean Hot Summer, or Csa in the Köppen classification (Appendix E). Rainfall is about 24 cm per year, based on rain gauge averages between 1963 and 2011, falling primarily between December and March. The average January daily minimum temperature is 2°C (36°F), and the average July daily maximum is 33°C (92°F). The climate would have imposed few constraints on prehistoric hunter-gatherers in the region.

The Project Site is composed of native upland vegetation communities typical of the high desert and transition zones. Additionally, there are a few wetland and riparian woodland vegetation communities. Native vegetation communities within the Boulder Brush Corridor include chaparral, montane buckwheat scrub, big sagebrush scrub, coast live oak woodland, riprarian forest, wildflower field, and emergent wetland. The Reservation supports large, intact expanses of relatively undisturbed habitats characteristic of the region. Dense chaparral covers much of the undeveloped portions of the Reservation, with oak woodlands and riparian habitats present along scattered canyons. Vegetation communities and plant species within the Project Site are described in Section 2.3, Biological Resources.

Mammals, birds, and reptiles within these communities provided potential food resources to prehistoric inhabitants. In the general region, much of the natural vegetation in low-lying areas has been displaced by modern land uses for grazing and residential uses. However, the steep mountain slopes harbor relatively intact native vegetation communities supporting many animal species. These vegetation communities have been in place since the early Holocene when the climate became somewhat warmer and drier (Axelrod 1978).

Over 300 species of animal have been observed within the Project Area. Common animals in this area include coyote (*Canis latrans*), California ground squirrel (*Spermophilus beecheyi*), cottontail (*Sylvilagus audubonii*), brush rabbit (*Sylvilagus bachmani*), red-tailed hawk (Buteo jamaicensis), western fence lizard (Sceloporus occidentalis), and common side-blotched lizard (*Uta stansburiana*), among many others. Wildlife species within the area are described in detail in Section 2.3, Biological Resources, of this EIR.

Cultural Setting

Evidence for continuous human occupation in Southern California spans the last 10,000 years. Various attempts to parse out variability in archaeological assemblages over this broad time frame have led to the development of several cultural chronologies; some of these are based on geologic time, most are based on temporal trends in archaeological assemblages, and others are interpretive reconstructions. Each of these reconstructions describes essentially similar trends in assemblage composition in more or less detail. The prehistoric sequence within the general Campo region is particularly complicated by potential overlap with aboriginal groups traveling west from the Colorado Desert and Imperial Valley. To overcome potential issues in the application of disparate cultural sequences, this research employs a common set of generalized terms used to describe chronological trends in assemblage composition: Paleoindian (pre-5500 BC), Archaic (8000 BC–AD 500), Late Prehistoric (AD 500–1769), and Ethnohistoric (post-AD 1769). For further discussion of the cultural setting, please see Appendix E of this EIR.

Methodology

The presence and significance of existing cultural resources associated with the Project were determined using the methodologies outlined below. Methodologies included a review of institutional records and reports for the Project APE and immediate vicinity; consultation with Native American Tribes and individuals; a field survey; surface mapping; a formal evaluation for significance that included artifact collection, bedrock-milling graphic and photographic documentation, and excavation of shovel test pits (STPs), surface scrape units (SSUs), shovel test units (STUs), and control units (CUs) to determine the extent, integrity, and constituents of site deposits. Site record forms (including updates) were prepared and will be submitted to the SCIC.

Background Research

Two records searches were performed for the Project. The first records search was performed by Dudek in 2017 for all private lands within the Boulder Brush Boundary, plus a 1-mile buffer around it. The records search involved a review of previously recorded cultural resources, previous cultural resources investigations and their limits within the Boulder Brush Boundary, historic addresses, and a historic maps database. The records search identified 31 studies that have been performed in the search area, including 11 that have covered at least part of the Boulder Brush APE. The entire Boulder Brush Boundary was surveyed in the early 1980s as part of a proposed lot split for residential development (Westec 1984; Appendix E). The records search identified 162 cultural resources that have been identified within 1.0 mile of the Boulder Brush Boundary; 16 of these are within the Boulder Brush APE. The 16 resources in the Boulder Brush APE include 13 prehistoric archaeological sites, one historic-era archaeological site, and two sites with both historic and prehistoric components. The remaining 146 resources have been recorded within 1.0 mile of the Boulder Brush APE.

The second records search was performed by SCIC staff on July 5, 2018, for the Campo APE and a 0.25-mile radius around the Campo APE. SCIC records indicate that 60 previous cultural resources studies have been performed within the records search area; of these, 37 have covered at least a portion of the Campo APE (Table 1-1 in Appendix E). ASM also prepared two studies that are not on file at the SCIC, although the site records and GIS data are. Hale et al. (2013) performed the intensive pedestrian survey for a wind farm on the Reservation, and Daniels and Schaefer (2013) performed additional surveys as an addendum to Hale et al. 2013.

A total of 117 cultural resources were identified in the records search area on the Reservation. Of these, 38 resources have been recorded wholly or partially in the Campo APE (Table 1-2 in Appendix E). Of the 38 previously recorded resources, 23 are prehistoric archaeological sites, three are multicomponent sites (containing both prehistoric and historic resources), four are historic built environment resources, six are historic archaeological sites, one is a prehistoric isolate, and one is an archaeological site of indeterminate age.

Field Methods

Techniques employed to identify and evaluate cultural resources within the Project APE included a Phase I Inventory and Phase II Archaeological Evaluation.

Phase I Inventory

Dudek conducted an Phase I intensive pedestrian survey of 696 acres of the Campo APE in July and August 2018 (the remaining 1,504 acres were surveyed by ASM [Daniels and Schaefer 2013; Hale et al. 2013] and the results of those studies are incorporated herein). Dudek conducted a Phase I cultural resources inventory of the Boulder Brush APE over several weeks in May 2017 and May and June 2018 (Appendix E).

The pedestrian survey was conducted in intervals of 15 meters (approximately 50 feet) or less, with variations in actual survey transect spacing dependent on ground visibility. Areas with dense vegetation required shorter 10-meter (approximately 33-foot) transect spacing, and areas with excellent ground visibility at times allowed for a maximum transect width of 15 meters (approximately 50 feet). Transect spacing was kept using a combination of compasses, the Trimble GeoXT, and field tablets equipped with a mobile Esri GIS application with real-time locations plotted on aerials. Road cuts, rodent burrows, and other areas of exposed ground were opportunistically examined for evidence of subsurface artifacts, midden soils, and other indications of potential buried materials. Bedrock outcrops were also targeted in order to identify milling features.

Upon the identification of a site, 2- to 5-meter interval transects were used to identify each artifact and feature. Visible artifacts were marked with pin flags to delineate the approximate size and boundaries of the site. Recordation of the site included field notes, the approximate surface artifact

inventory, identified features, photographs of the site, and Universal Transverse Mercator coordinates of site components. Each new site was assigned a temporary resource identifier for tracking during post-field data processing. No artifact collections were made during the inventory.

Phase II Archaeological Evaluation

The Phase II evaluation was directed at sites located wholly or partially in the Project ADI, which comprises an area of approximately 921 acres in total, including 131 acres on Boulder Brush and 790 acres on Campo Wind. Of the 158 cultural resources found within the Project APE, 47 are located within the Project ADI (31 sites, 12 isolates, and 4 built environment resources). Three of the built environment resources (two roads and one railroad) and seven archaeological sites were evaluated for other projects; these resources are discussed below, but no further evaluation efforts were performed for this Project. Evaluation efforts were focused on unevaluated archaeological sites within the Project ADI, as well as one historic road. Archaeological testing efforts for each resource were focused on those portions of the site that fall within the Project ADI. Portions of cultural resources that fall outside the Project ADI were not evaluated because they would not be directly or indirectly impacted by the development.

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

Concentrations or areas where artifact density was relatively higher than other portions of the site were mapped and collected separately from any artifacts and materials collected at a non-specific location. Non-specific, site-wide surface collection was the minimal collection method conducted at every site where artifacts were still present. Controlled surface collection (CSC) was used to collect surface artifacts in formal grids, which allows comparison of surface density variations across a site. CSCs vary in size but typically measure 15 meters by 15 meters (approximately 50 feet by 50 feet) or 10 meters by 10 meters (30 feet by 30 feet) and were divided into individual 5 meter by 5 meter (15 foot by 15 foot) quadrants where all cultural materials noted on the ground surface were collected by quadrant, with close attention paid to any specific spatial distributions found within the CSC. CSCs were placed in areas identified as having higher concentrations of artifacts, and when possible, at least one CSC was placed in such concentrations.

Numerous types of excavation units were used for field evaluations for the Project. All units were excavated with square corners to enable their expansion to more thoroughly explore deposits.

Shovel Test Pits (STP) are small (0.5-meter [approximately 1.6-foot] by 0.25-meter [approximately 0.8-foot] exploratory units excavated in 20-centimeter [approximately 8-inch] increments to depths of no more than 80 centimeters [approximately 31 inches]) and typically spaced at 10- to 20-meter (approximately 39-foot to 66-foot) intervals or subjectively placed.

When surface artifacts were present, but the STPs and other excavated units strongly suggested minimal subsurface cultural deposits, Shovel Scrape Units (SSU), typically measuring between 2 meters by 2 meters (approximately 6.5 feet by 6.5 feet) and 3 meters by 3 meters (approximately 10 feet by 10 feet), were excavated in a single level (2 to 10-centimeters [approximately 1 to 4-inches]) in an effort to collect the maximum artifact deposit with only minimal excavation where the potential for sediment accumulation was limited (e.g., areas of near-surface bedrock or erosional surfaces). When substantial quantities of artifacts were uncovered and identified during STP or SSU excavation, a 1-meter by 1-meter (approximately 3.3-foot by 3.3-foot) Control Unit (CU) or 1-meter by 0.5-meter (approximately 3.3-foot by 1.7 foot) Shovel Test Unit (STU) was used to explore the feature. CUs are excavated in standard 10-centimeter (approximately 4-inch) levels and STUs are excavated in 10-centimeter (approximately 4-inch) or 20-centimeter (approximately 8-inch) levels. No CUs were excavated because no substantial subsurface deposits were identified.

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

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

Laboratory and Cataloging Procedures

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

After preliminary cataloging of material was completed, more detailed attribute analysis was performed. Stone artifacts (flaked and ground) were individually analyzed for selected morphological and technological attributes, as well as material and condition, in an attempt to gain insight into the period of occupation and the range of activities undertaken. All artifacts, ecofacts, and samples were subject to appropriate conservation in the field and laboratory, including proper packaging and handling. Artifact catalogs can be found in Appendix C of Appendix E.

<u>Cultural Material Conveyance</u>

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

Native American Correspondence and Participation

The Native American Heritage Commission (NAHC) was contacted on January 8, 2019, for a search of its Sacred Lands File for data relating to the Boulder Brush Facilities and a list of persons and tribes that may have information related to the resources in the Project APE (Confidential Appendix D to Appendix E). The NAHC responded on January 10, 2019, stating that no resources are listed in the Sacred Lands File for this area, but they provided contact information for Native American tribes that may have additional information. Letters were sent to the identified tribes requesting information or concerns they may have related to the Project on January 15, 2019. One response has been received to date. On January 29, 2019, the Viejas Band of Kumeyaay Indians stated this area has cultural significance to Viejas. They requested that Native American monitors be present for ground-disturbing activities and that the tribe be kept informed of new developments such inadvertent discoveries.

Red Tail Monitoring and Research, Inc. provided Native American monitors during the inventory efforts in 2017. Red Tail monitors included Justin Linton and Gabe Kitchen. The Reservation provided monitors during survey and evaluation efforts in 2018. Monitors representing the Campo Band of Diegueño Mission Indians (Tribe) included Monique LaChappa, Andrea Najera, Lewis Connelly, Phillip Paipa, Ron Cuero, Jon Jones, and Gerricho Dyche. Marcus Cuero and Ron Cuero, also of Campo, participated in site visits to identify human remains on the Reservation. The Kumeyaay Cultural Repatriation Committee (KCRC) were identified as the Most Likely Descendant (MLD) for the human remains identified on privately-owned lands. Clint Linton represented the MLD regarding treatment of the human remains.

Government-to-government consultation pursuant to Assembly Bill 52 is on-going and has been performed by County staff. Tribal consultation between the BIA and federally recognized tribes is ongoing. To date, Tribal Cultural Resources (TCR) have been identified and includes all sites that contain human remains (CA-SDI-7140, CA-SDI-7151/7162, CA-SDI-8939, CA-SDI-22581, and CA-SDI-22596). In addition, one other resource (P-37-038463), a zoomorphic rock, was also identified as a TCR. Tribal members and the MLD requested that all sites with human remains be avoided. Avoidance of all sites with human remains was accomplished through Project redesign efforts. P-37-038463 has also been avoided. This document will be updated with any information obtained though consultation. All Tribal correspondence documents are included in Confidential Appendix D to Appendix E of this document.

Results

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

The current investigation identified 158 resources in the Project APE, including 87 archaeological sites, 4 built environment resources, and 67 isolates. No evidence was found for nine previously recorded archaeological sites and one isolate and they are considered to no longer exist, including three sites outside of the Boulder Brush ADI (CA-SDI-4005, -7138, and -7149), five sites and one isolate in the Campo APE but outside of the Campo ADI (CA-SDI-7258, -8198, -8946, -8968, and -8980, and P-37-032854), and one site in the Campo ADI (CA-SDI-8962). A description of resources identified in the Project APE but outside the Project ADI is included in Tables 2.4-1 and 2.4-3.

Inventory Results Outside the Project ADI

During the Phase I inventory for the cultural resources effort, Dudek identified 47 sites and 54 isolates outside the Project ADI. Forty (40) of these sites and 45 isolates are located in, or outside the Boulder Brush APE; and 38 sites and 9 isolates are located in, or outside the Campo APE (Appendix E). Eight other previously recorded sites and one isolate could not be relocated and are likely outside the Project APE.

Table 2.4-1, Frequency of Cultural Resources Identified Within and Outside of the Project ADI, summarizes the resources that will be avoided and have not been evaluated for the Project (Sites outside of ADI) and sites that have been evaluated and will be impacts (Sites in the ADI). Table 2.4-3, Cultural Resources outside the Project ADI, summarizes the inventory results for resources outside the Project ADI (including sites that were evaluated previously for other projects). These resources are identified on the Cultural Resource Results Maps in the confidential appendices to Appendix E.

One resource (P-37-038463) is a zoomorphic rock formation identified by Native American consultants during a site visit as part of the AB 52 process. This resource was documented on a DPR form and was noted as being a TCR. As such this resource is significant under CEQA. P-37-038463 is located just along the margin of, and outside, the Boulder Brush APE, but is included herein to ensure its documentation and consideration in the planning process. It will be avoided by Project design and preserved in place.

Evaluation Results of the Project APE Inside the Project ADI

A total of 47 extant cultural resources are located within the Project ADI, including 10 sites and 10 isolates in the Boulder Brush ADI, and 21 sites, 2 isolates, and 4 built environment resources in the Campo ADI (Table 2.4-2). One additional previously recorded site could not be relocated and is likely outside the Project APE.

For the 47 resources within the Project ADI (including 31 archaeological sites, 12 isolates, and 4 built environment resources; Table 2.4-4, Management Summary within the Project ADI), each resource is analyzed. For the archaeological sites evaluated for the Project, site assemblage compositions and distributions are detailed and used to assess the function and significance for each site. Sketch maps for each site showing excavation units, surface artifacts, and features are included in Confidential Appendix C to Appendix E. All archaeological sites and one isolate in the ADI were formally evaluated through field excavation and laboratory analysis. One built resource (a road) was evaluated through archival research and field documentation; the other three built environment resources and seven archaeological sites were previously evaluated.

Evaluation Results of Isolates within the Project ADI

Twelve isolates identified within the Project ADI have been evaluated (P-37-038189, P-37-038190, P-37-038204, P-37-038206, P-37-038211, P-37-038212, P-37-038213, P-37-038229, P-37-038230, P-37-038232, P-37-038280, and P-37-038285) based on survey level data. None of these are significant under CEQA or are eligible for listing in the California Register of Historical Resources (CRHR) or the local register, and none within unincorporated lands are significant under the County Resource Protection Ordinance (RPO).

2.4.2 Regulatory Setting

Set forth below are short descriptions of the various federal, state, and local laws and regulations that generally apply to the resource or impact category analyzed in this section. This information helps to place the impact analysis within its proper regulatory context.

Tribal Regulations

Tribal regulations are applicable to the Campo Wind Facilities and the Campo Reservation. Tribal regulations are not applicable to the Boulder Brush Facilities, which are proposed on private land subject to the County's jurisdiction.

Under the terms of the Campo Lease between the Tribe and the Developer, the Campo Land Use Plan is not applicable to the Campo Wind Facilities, with the exception of set-back requirements.

Campo Band of Mission Indians Land Use Plan

The Tribe has adopted a Land Use Plan to guide physical development within the Reservation and ensure it occurs in a manner consistent with the Tribe's goals for economic and social advancement and that development does not threaten the environment and cultural resources of the Reservation or surrounding communities. The Land Use Plan, Chapter 4, Policies, Goals, and Objectives of Land Use, states that is it a primary goal of the members of the Tribe to preserve the traditions and values of their culture via language, ceremonies, and religious practices, and to protect and preserve the historical and archaeological resources present on the Reservation.

The Land Use Plan also contains a Cultural Resources Element. This includes objectives, programs, and standards as outlined below:

Objectives

- 1. Protect and preserve historic and archaeological resources on the Reservation.
- 2. Encourage and promote the recognition of the significance of historic and archaeological resources to the maintenance of the Campo Band's cultural heritage among tribal members and general public.
- 3. Assess current and proposed land uses for impacts on cultural resources.

Programs

The Campo Environmental Protection Agency (CEPA) shall continue to monitor the preservation of cultural resources on the Reservation and maintain an updated inventory and map of these resources which can be used in the evaluation of prospective development on tribal lands. Developers shall be

required to engage qualified archaeological assistance in preparing a comprehensive cultural resources study of an area proposed for development and not previously surveyed.

A historic or prehistoric resource shall be determined to be significant if it has one or more of the following characteristics:

- 1. It exemplifies or reflects the broad cultural, political, economic, or social history of the Campo Band.
- 2. It has yielded or has the potential to yield information important in history of prehistory.
- 3. It is a site or structure that is important to the history of the Campo Band.
- 4. It is a surviving site, structure, or object important to the culture or community for scientific, traditional, religious, or other reasons.

Standards

The proposed development shall be assessed for potential impacts upon historic and prehistoric resources. If the proposed development is found to have significant impacts on prehistoric or historic resources it shall be required to provide adequate mitigation of those impacts, in accordance with the recommendations of a qualified archaeological consultant and the designated Cultural Resources lead for the Reservation. Mitigation measures may include monitoring of earth moving or construction equipment, study and documentation of resources, extraction and/or preservation of resources, or incorporation of the resources into the project design.

Federal Laws and Regulations

Federal laws and regulations are applicable to the Campo Wind Facilities and the Reservation. Federal regulations described below are only applicable to Boulder Brush Facilities if a federal permit is required.

National Historic Preservation Act

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

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

National Register of Historic Places

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

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

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

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

Traditional Cultural Properties/Tribal Cultural Resources

Native American Heritage Values

Federal and state laws mandate that consideration be given to the concerns of contemporary Native Americans with regard to potentially ancestral human remains, associated funerary objects, and items of cultural patrimony. These values are further discussed in Section 2.7, Tribal Cultural Resources, of this EIR.

State Laws and Regulations

State laws and regulations are applicable to the Boulder Brush Facilities which are proposed on private lands subject to the County's jurisdiction. State regulations are not applicable to the Campo Wind Facilities or the Reservation.

California Register of Historical Resources

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

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

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

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

California Environmental Quality Act

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

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

- 1. A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code 5024.1, Title 14 CCR, Section 4850 et seq.).
- 2. A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- 3. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (14 CCR 4852) including the following:
 - a. Is associated with events that have made a contribution to the broad patterns of California history and cultural heritage;
 - b. Is associated with the lives of persons important in our past;
 - c. Embodies the distinctive characteristics of a type, period, region or method construction, or represents the work of an important individual or possesses high artistic values; or
 - d. Has yielded, or may be likely to yield, important information in prehistory or history.
- 4. The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code Sections 5020.1(j) or 5024.1

If a cultural resource does not meet the definition of a "historic resource" under CEQA Guidelines, Section 15164.5, it must be reviewed under CEQA Statutes, Section 21083.2(g), which defines the significance of an archaeological site in terms of uniqueness. A unique archaeological resource

means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets one of the following criteria:

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

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

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

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

2. Where the following conditions occur, the landowner or his authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further subsurface disturbance:

- a. The NAHC is unable to identify an MLD, or the MLD failed to make a recommendation within 24 hours after being notified by the commission; or
- b. The descendant identified fails to make a recommendation; or
- c. The landowner or his authorized representative rejects the recommendation of the descendant, and the mediation by the NAHC fails to provide measures acceptable to the landowner.

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

Local Laws and Regulations

Local laws and regulations are applicable to the Boulder Brush Facilities which are proposed on private lands subject to the County's jurisdiction. Local regulations are not applicable to the Campo Wind Facilities or the Reservation.

San Diego County Local Register of Historical Resources

The criteria for listing historical resources to the local register (Ordinance No. 9493) are consistent with those developed by the Office of Historic Preservation for listing resources to the CRHR but have been modified for local use to include a range of historical resources that specifically reflect the history and prehistory of the County. Only resources that meet the criteria set out below may be listed or formally determined eligible for listing in the local register:

- 1. The resource is associated with events that have made a significant contribution to the broad patterns of the County's history and cultural heritage
- 2. The resource is associated with the lives of persons important to the history of the County or its communities
- 3. The resource embodies the distinctive characteristics of a type, period, County region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values
- 4. The resource has yielded or may be likely to yield information important in prehistory or history

San Diego County General Plan – Conservation and Open Space Element

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

- 1. **Goal COS-7: Protection and Preservation of Archaeological Resources.** Protection and preservation of the County's important archaeological resources for their cultural importance to local communities, as well as their research and educational potential.
 - a. **Policy COS-7.1: Archaeological Protection.** Preserve important archaeological resources from loss or destruction and require development to include appropriate mitigation to protect the quality and integrity of these resources.
 - b. **Policy COS-7.2: Open Space Easements.** Require development to avoid archaeological resources whenever possible. If complete avoidance is not possible, require development to fully mitigate impacts to archaeological resources.
 - c. **Policy COS-7.3: Archaeological Collections.** Require the appropriate treatment and preservation of archaeological collections in a culturally appropriate manner.
 - d. **Policy COS-7.4: Consultation with Affected Communities.** Require consultation with affected communities, including local tribes to determine the appropriate treatment of cultural resources.
 - e. **Policy COS-7.5: Treatment of Human Remains.** Require human remains be treated with the utmost dignity and respect and that the disposition and handling of human remains will be done in consultation with the Most Likely Descendant (MLD) and under the requirements of Federal, State, and County Regulations.
 - f. Policy COS-7.6: Cultural Resource Data Management. Coordinate with public agencies, tribes, and institutions in order to build and maintain a central database that includes a notation whether collections from each site are being curated, and if so, where, along with the nature and location of cultural resources throughout the County of San Diego.
- 2. Goal COS-8: Protection and Conservation of the Historical Built Environment. Protection, conservation, use, and enjoyment of the County's important historic resources.
 - a. Policy COS-8.1: Preservation and Adaptive Reuse. Encourage the preservation and/or adaptive reuse of historic sites, structures, and landscapes as a means of protecting important historic resources as part of the discretionary application process, and encourage the preservation of historic structures identified during the ministerial application process.
 - b. **Policy COS-8.2: Education and Interpretation.** Encourage and promote the development of educational and interpretive programs that focus on the rich multicultural heritage of the County of San Diego.

County of San Diego Resource Protection Ordinance

The RPO requires that cultural resources be evaluated as part of the County's discretionary environmental review process for certain permit types. If cultural resources are found to be significant pursuant to the RPO, they must be preserved (County of San Diego 2007a). The RPO prohibits development, trenching, grading, clearing, and grubbing, or any other activity or use that damages significant prehistoric or historic site lands (except for scientific investigations with an approved research design prepared by an archaeologist certified by the Register of Professional Archaeologists).

Pursuant to the RPO (2007), significant prehistoric or historic sites are sites that provide information regarding important scientific research questions about prehistoric or historic activities that have scientific, religious, or other ethnic value of local, regional, state, or federal importance. Such locations include, but are not limited to:

- 1. Any prehistoric or historic district, site, interrelated collection of features or artifacts, building, structure, or object either:
 - a. Formally determined eligible or listed in the NRHP by the Keeper of the National Register; or
 - b. To which the Historic Resource (H designator) Special Area Regulations have been applied; or
- 2. One-of-a-kind, locally unique, or regionally unique cultural resources which contain a significant volume and range of data and materials; and
- 3. Any location of past or current sacred religious or ceremonial observances which is either:
 - a. Protected under Public Law 95-341, the American Indian Religious Freedom Act or Public Resources Code 5097.9, such as burial(s), pictographs, petroglyphs, solstice observatory sites, sacred shrines, religious ground figures, or
 - b. Other formally designated and recognized sites which are of ritual, ceremonial, or sacred value to any prehistoric or historic ethnic group.

County of San Diego Grading Ordinance

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

2.4.3 Analysis of Project Effects and Determination as to Significance

Although the County as Lead Agency is analyzing the Project as a whole, the County's land use jurisdiction is limited to the Boulder Brush Facilities. The Bureau of Indian Affairs has jurisdiction over the Campo Wind Facilities and has prepared an Environmental Impact Statement (EIS) to evaluate Project effects under the National Environmental Policy Act (NEPA). This analysis hereby adopts and incorporates by reference the EIS. In addition, this chapter provides an analysis of the Project impacts, both on the Reservation and on private lands, pursuant to the requirements of CEQA and consistent with the County's own guidelines.

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

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

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

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

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

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

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

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

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

Guidelines for the Determination of Significance

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

- 1. The project, as designed, causes a substantial adverse change in the significance of a historic resource as defined in §15064.5 of the State CEQA Guidelines. This shall include the destruction, disturbance or any alteration of characteristics or elements of a resource that cause it to be significant, in a manner not consistent with the Secretary of Interior Standards.
- 2. The project causes a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the State CEQA Guidelines. This shall include the destruction or disturbance of an important archaeological site or any portion of an important archaeological site that contains or has the potential to contain information important to history or prehistory.
- 3. The project causes a substantial adverse change in the significance of a tribal cultural resource. This shall include the destruction or disturbance of a tribal cultural resource that is important to local tribal communities. [See Section 2.7 of this EIR.]
- 4. The project disturbs any human remains, including those interred outside of formal cemeteries.
- 5. The project proposed activities or uses damaging to significant cultural resources as defined by the Resource Protection Ordinance and fails to preserve those resources.

Guidelines 1 and 2 are derived directly from CEQA. Sections 21083.2 of CEQA and 15064.5 of the CEQA Guidelines recommend evaluating historical and archaeological resources to determine whether or not a proposed action would have a significant effect on unique historical or archaeological resources. Guideline 4 is included because human remains must be treated with dignity and respect, and CEQA requires consultation with the MLD as identified by the NAHC for any project in which human remains have been identified. Guideline 5 was selected because the Resource Protection Ordinance requires that cultural resources be considered when assessing environmental impacts.

All discretionary projects on lands within the County's jurisdiction are required to conform to applicable County standards related to cultural resources. These include the Zoning Ordinance; General Plan; and the Grading, Clearing and Watercourses Ordinance (Section 87.429). Non-compliance would result in a project that is inconsistent with County standards, which is itself a significant impact under CEQA.

Historical Resources

Project

No historical (built environment) resources were identified within the Boulder Brush Corridor. Four historical (built environment) resources (three roads and one railroad) were identified within the Reservation during the inventory. Three of the resources (CA-SDI-6891, P-37-024023, and P-37-025680) were previously evaluated for significance under CEQA and/or Section 106 of the NHPA; one (CA-SDI-9059) was not previously evaluated. CA-SDI-9059 and CA-SDI-6891 are determined not eligible for listing in the NRHP, or CRHR. For P-37-024023 and P-37-025680, Project construction has been designed to avoid alteration or damage to these resources. Iimplementation of the Project would have a **less-than-significant impact** on historical resources.

Boulder Brush Facilities

No historical (built environment) resources were identified within the Boulder Brush Corridor, and therefore impacts as a result of the Boulder Brush Facilities would be **less than significant**.

Campo Wind Facilities

Four historical (built environment) resources (three roads and one railroad) were identified within the Reservation during the inventory. Three of the resources (CA-SDI-6891, P-37-024023, and P-37-025680) were previously evaluated for significance under CEQA and/or Section 106 of the NHPA; one (CA-SDI-9059) was not previously evaluated.

CA-SDI-6891, also known as Campo Road, was evaluated by Caltrans in 2011 and determined not be not eligible for listing in the NRHP or the CRHR as it no longer retains sufficient integrity to it period of significance due to numerous alterations and upgrades over the years.

P-37-024023 is Old Highway 80, which was determined eligible for listing in the NRHP in 2010 and is therefore automatically significant under CEQA and eligible for listing in the CRHR. Damage, alteration, or destruction of the road would be a significant impact under CEQA and County Guidelines. Construction has been designed to avoid alteration or damage to the road and there would be no impact to the resource.

P-37-025680 is the Union Pacific Railroad, also referred to as the San Diego and Arizona Eastern Railway. It was originally recorded by JRP Consulting in 2000, who determined the resource was not eligible for NRHP listing, although it was not formally evaluated for significance under CEQA. The railroad intersects the Project in three locations (an access road, an underground collector line, and one turbine pad); Project activities in these locations could damage or destroy the resource. The access road is the existing BIA Road 15, a dirt road that currently crosses the railroad. The

Campo Wind Facilities have been designed such that it would not alter the road (other than maintaining it for active use). The collector line would be installed either by spanning the railroad overhead, or by directional drilling underground below the railroad berm; both methods would avoid damage to the resource. One turbine work pad extends into the right-of-way (ROW) of the railroad. This pad would be reduced in size and temporary fencing would be installed along the ROW. As of result of these three design considerations, the resource would be avoided by Project design, and impacts to the resource would be **less than significant**.

CA-SDI-9059 is a wagon road also known in part as Lazy M Lane. This road was evaluated and determined not significant under CEQA, and not eligible for listing in the NRHP, CRHR, or local register.

Implementation of the Campo Wind Facilities would have a **less-than-significant impact** on historical resources.

The BIA has jurisdiction over the Campo Wind Facilities and has prepared an EIS to evaluate Project effects under NEPA. The EIS analysis determined that resources CA-SDI-9059, P-37-025680, and CA-SDI-6891 are not eligible for listing in the NRHP and therefore are not considered historic properties. P-37-024023 is an historic property. Construction has been designed to avoid alteration or damage to the road and there would be no damage to the historic property. As such, there would be no adverse effect to historic properties. The analysis and conclusions contained in the EIS are hereby incorporated by reference in this analysis.

<u>Archaeological Resources</u>

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

Project

The Project has the potential to result in **potentially significant impacts** to archaeological resources during Project construction (**Impact CR-1/Impact CR-A, Impact CR-2/Impact CR-B,** and **Impact CR-4/Impact CR-D**). Project impacts to archaeological resources during construction is analyzed in detail below specific to the resource location(s).

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

Boulder Brush Facilities

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

Construction of the Boulder Brush Facilities could affect cultural resources within 50 feet of the Boulder Brush ADI or within resource-specific, predetermined buffers. CA-SDI-7140 is within 50 feet of the Boulder Brush ADI, and inadvertent impacts to this resource could be **potentially significant** as a result of Boulder Brush Facilities construction (**Impact CR-1**).

All 10 of the identified archaeological resources within the Boulder Brush ADI are not significant under CEQA or the RPO, and none of these resources are eligible for listing in the CRHR or local register (County of San Diego 2007c) (Table 2.4-2). However, under County Guidelines, all archaeological sites are important. Six sites (CA-SDI-7145/7146, CA-SDI-7163, CA-SDI-22565, CA-SDI-22575, CA-SDI-22576, CA-SDI-22586), are outside the Boulder Brush ADI, but have the potential to be a **potentially significant** direct or indirect impact (**Impact CR-2**) as a result of Boulder Brush Facilities construction.

One site (CA-SDI-7151/7162) was previously evaluated by Westec (1984) and BFSA (1998) and determined to be eligible for listing to the CRHR and significant under CEQA and the County RPO. During the current study, Dudek recorded a small expansion to the site and identified human remains at two locations within the site. At the request of the MLD and through Tribal consultation, the Boulder Brush Facilities were redesigned to avoid all impacts to the site (refer to Table 2.4-5, Resource Mitigation Measures). Site CA-SDI-22581 was found to contain human remains during the survey efforts, and site CA-SDI-7140 was found to contain human remains during evaluation efforts for a separate project (Appendix E). At the request of the MLD and through Tribal consultation, the Project was redesigned to avoid all impacts to both sites (refer to Table 2.4-5). As a result of redesign efforts, all three sites (CA-SDI-7151/7162, CA-SDI-22581, and CA-SDI-7140) would be avoided by Project design. However, as discussed above, CA-SDI-7140 is within 50 feet of the Boulder Brush ADI and could be inadvertently impacted (Impact CR-1). The Boulder Brush Facilities also have the potential to impact unknown archaeological resources during construction. Impacts to unknown archaeological resources would be potentially significant (Impact CR-4).

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

Campo Wind Facilities

Construction of the Campo Wind Facilities could affect cultural resources within 50 feet of the Campo ADI. Inadvertent impacts to six resources (CA-SDI-20586, CA-SDI-20598, CA-SDI-20611, CA-SDI-22595, CA-SDI-22596, and CA-SDI-22598) within 50 feet of the Campo ADI, could occur as a result of Campo Wind Facilities construction. Therefore, impacts would be **potentially significant** (**Impact CR-A**).

All 21 archaeological sites and 4 built-environment resources within the Campo ADI are not significant under CEQA, and none of these resources are eligible for listing in the CRHR or local register (County of San Diego 2007c) (Table 2.4-2). However, **potentially significant** impacts to seven sites (CA-SDI-8977, CA-SDI-9050, CA-SDI-20368, CA-SDI-20587, CA-SDI-20592, CA-SDI-20605, and CA-SDI-22602) that are outside the Campo ADI could occur during construction of the Campo Wind Facilities (**Impact CR-B**).

Two sites on the Reservation were found to contain human remains (CA-SDI-8939 and CA-SDI-22596). These sites are therefore considered significant under CEQA and the RPO. As a result of requests made through consultation with Tribes under Assembly Bill 52 and the MLD, the Project was redesigned to avoid all impacts to these sites. These two sites would be avoided by Project design. However, as stated above, CA-SDI-22596 is within 50 feet of the Campo ADI and there is a potential for inadvertent impacts (**Impact CR-A**).

A total of 79 extant archaeological resources are present outside the Campo ADI. None of these resources would be impacted by Campo Wind Facilities implementation, as all have been avoided through Project design and would be preserved in place.

BIA has jurisdiction over the Campo Wind Facilities and has prepared an EIS to evaluate the Project effects under NEPA. The EIS analysis determined that effects would be less than significant with the implementation of recommended mitigation measures. The analysis and conclusions contained in the EIS are hereby incorporated by reference in this analysis.

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

Human Remains

Project

Human remains were discovered during the fieldwork at five sites within the Project Area, CA-SDI-7140, CA-SDI-7151/7162, and CA-SDI-22581 within the Boulder Brush Boundary; and CA-SDI-8939 and CA-SDI-22596 On-Reservation. Inadvertent disturbance during construction could impact these resources (**Impact CR-1/Impact CR-A** and **Impact CR-3/Impact CR-C**). Project impacts to human remains during construction is analyzed in detail below, specific to the resource location(s).

Once in operation, the Project would not involve additional ground-disturbing activities that could potentially impact human remains within the Project APE. Therefore, impacts during operation would be **less than significant**.

Boulder Brush Facilities

Human remains were discovered during the fieldwork at three sites within the Boulder Brush Boundary, CA-SDI-7140, CA-SDI-7151/7162, and CA-SDI-22581. Potential human remains were found at a fourth site, CA-SDI-7156, but were determined to be non-human by the County Coroner's Office Forensic Anthropologist. The locations of human remains are outside the Boulder Brush ADI and will be avoided through Project design. However, inadvertent disturbance could impact CA-SDI-1740 (Impact CR-1 and Impact CR-3).

Once in operation, the Boulder Brush Facilities would not involve additional ground-disturbing activities that could potentially impact human remains within the Boulder Brush APE. Therefore, impacts during operation would be **less than significant**.

Campo Wind Facilities

Human remains were identified at two sites on the Reservation (CA-SDI-8939 and CA-SDI-22596). The Campo Wind Facilities has been designed to avoid all impacts to these sites, and they will be avoided through Project Design. However, due to the proximity of CA-SDI-22596 to construction activities, there is a potential for inadvertent impacts to the site (**Impact CR-A**). There is also the potential to identify unknown human remains during ground-disturbing activities associated with the construction of the Campo Wind Facilities (**Impact CR-C**).

The BIA has jurisdiction over the Campo Wind Facilities and has prepared an EIS to evaluate the Project effects under NEPA. The EIS analysis finds that known resources are avoided and recommends mitigation to address for the unexpected discovery of resources. The analysis and conclusions contained in the EIS are hereby incorporated by reference in this analysis.

Once in operation, the Campo Wind Facilities would not involve additional ground-disturbing activities that could potentially impact human remains within the Campo APE. Therefore, impacts during operation would be **less than significant**.

2.4.4 Cumulative Impact Analysis

According to CEQA, the importance of cultural resources comes from the research value and the information they contain. Therefore, the issue that must be explored in a cumulative analysis is the cumulative loss of that information. For sites that are less than significant, the information is preserved through recordation and test excavations. Significant sites that are placed in open space easements avoid impacts to cultural resources and preserve the data. Significant sites that are not placed within open space easements preserve the information through recordation, test excavations, and data recovery programs that would be presented in reports and filed with the County and the SCIC. The artifact collections from any potentially significant site would also be curated at a facility within the County or with an affiliated Tribal curation facility. Alternatively, the collections may be repatriated to a Tribe of appropriate affiliation.

The cumulative study area includes southeastern San Diego County and southwestern Imperial County and was selected because these areas include the relatively undeveloped portions of the ancestral Kumeyaay territory, and those rural areas outside of the historically developed urban population centers in San Diego and southwestern Imperial County, as shown in Figure 1-11, Cumulative Projects, in Chapter 1, Project Description, Location, and Environmental Setting, of this EIR. These cumulative projects are summarized in Table 1-4 of Chapter 1. Related projects within this geographic extent are capable of collectively contributing, along with the Project's APE, to impacts on prehistoric and historic period resources associated with ancestral Kumeyaay lifestyles.

Thirty-one archaeological sites and three built environment resources within the ADI (10 archaeological sites in the Boulder Brush ADI; 22 sites and three built environment resources in the Campo ADI) have been evaluated during the current investigation or in previous project investigations and were determined to be not significant under CEQA or the County RPO, and not eligible for listing in the CRHR or the local register (Appendix E). Within the cumulative study area, 13 sites are CEQA-significant, 2 sites are RPO-significant, and 4 sites are both CEQA- and RPO-significant cultural resources because of their potential to provide important information about scientific research questions. Prehistoric and historic settlement patterns can be very broad; therefore, it is prudent to consider a large study area when evaluating cumulative impacts.

Five projects within the cumulative study area contain significant cultural resources and ten projects contain potentially significant cultural sites (testing would need to be completed to determine whether the sites are significant). The remaining cultural resources in the vicinity of the Project Area were determined not to be significant cultural resources. The following is a discussion of the significant and potentially significant cultural resources within the cumulative project boundaries.

Prehistoric site types identified in the cumulative project area include: small artifact scatters, bedrock milling features, temporary camps, rock shelters, roasting pits and habitation sites. Dated prehistoric sites predominantly fall into the Late Prehistoric Period, with a limited number of sites having Archaic Period components. Prehistoric sites which have been determined to be significant are all habitation sites and/or sites with human remains. Historic period sites are predominantly refuse deposits consisting of food and beverage containers; building and/or structure foundations; buildings; mining related features (e.g., pits, adits); and ranching related features (e.g., fences) and transportation corridors (roads, railroads). Historic sites which have been determined significant include Camp Lockett, a WWII-era military camp. Impacts to significant sites on the cumulative projects list were, or are proposed to be, mitigated through a combination of avoidance, where project components were realigned or open space was created in order to avoid impacts to sites; data recovery, where the information potential of the sites was collected through excavation and recordation; curation of collected artifacts; and monitoring of ground disturbing construction activities to prevent significant impacts to previously unidentified sites and sites which have not been evaluated.

The Project's impacts to cultural resources would be reduced to less than significant through the evaluation of known and newly discovered sites that cannot be avoided, and avoidance of significant sites by Project design), curation or repatriation of all artifacts obtained during the testing and data recovery programs, and grading monitoring that includes avoidance or data recovery at new discoveries. As outlined above, the cultural resources located within the cumulative projects would be mitigated through similar measures.

Tribal cultural properties (TCPs) are resources that can qualify under several of the County's RPO criteria and thus require avoidance and preservation in place. Six TCPs have been identified within the Project Boundary. All six have been avoided by Project design and would not be impacted. Furthermore, TCPs have not been identified in the cumulative project area. Any TCPs identified during grading monitoring would result in a potentially significant impact. Impacts can be reduced to less than significant through avoidance by Project design.

Because the Project and those projects identified within the cumulative study area are mitigated by the collection and curation of information, construction monitoring, and the preservation of the most important resources, adequate mitigation has occurred for in situ appreciation of and access to information regarding those sites. This reduces the potential for cumulative effects and the Project would not contribute to a significant cumulative impact to cultural resources.

2.4.5 Significance of Impacts Prior to Mitigation

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

- The Project's development activities could affect cultural resources within 50 feet of the Project ADI or within resource-specific, predetermined buffers (**Impact CR-1/Impact CR-A**).
- The Project has the potential to affect 37 cultural resources that, although they are not recommended as eligible for listing in the CRHR or the local register, are important under the County CEQA Guidelines (Impact CR-2/Impact CR-B).
- The Project has the potential to affect undiscovered human remains (Impact CR-3/Impact CR-C).
- The Project has the potential to affect undiscovered cultural resources that may qualify as significant under the County Guidelines (**Impact CR-4/Impact CR-D**).

2.4.6 Mitigation

Implementation of Mitigation Measures (M) M-CR-1 (temporary exclusionary fencing), M-CR-2 (archaeological monitoring, evaluation, data recovery and treatment of unanticipated discoveries and human remains), and M-CR-3 (avoidance through preservation in place) would mitigate significant impacts to cultural resources. These mitigation measures are provided below.

Boulder Brush Facilities

This section discusses mitigation measures as applicable to Project components on County administered lands (Boulder Brush Facilities and Off-Reservation improvements).

- M-CR-1 Temporary Fencing. To prevent inadvertent disturbance of archaeological sites within the avoidance areas (avoided by Project design), temporary fencing shall be installed where resources are located within 50 feet of the Boulder Brush area of direct impact (ADI). The temporary fencing shall include the following requirements:
 - Prior to the commencement of any grading and/or clearing in association with the grading and/or improvement plan, temporary orange construction fencing shall be placed to protect archaeological sites from inadvertent disturbance within the avoidance areas (avoided by Project design) and the unimpacted portions of sites outside of the Boulder Brush ADI during earth-disturbing activities. Temporary fencing shall be installed prior to the pre-construction meeting and prior to any clearing, grubbing, trenching, grading, or land disturbances; and shall remain for the duration of earth-disturbing activities. The temporary fencing plan shall be

prepared in consultation with a County-approved archaeologist and the Kumeyaay Native American monitor. The fence shall be installed under the supervision of the County-approved archaeologist prior to commencement of any earth-disturbing activities. The temporary fencing plan shall include the following:

- Temporary fencing is required in all locations of the Project where proposed grading or clearing is within 50 feet of any archaeological site within avoidance areas (open space) or the unaffected portions of sites outside of the Boulder Brush ADI. The Project archaeologist shall identify the locations where temporary fencing is required.
- The placement of temporary fencing shall be approved by the County. Upon approval, the temporary fencing shall be installed under the supervision of the Project archaeologist.
- A signed and stamped statement from a California Registered Engineer, or licensed surveyor shall be submitted to Planning & Development Services for approval. The statement shall identify that temporary fencing has been installed in all required locations where grading or clearing is within 50 feet of an archaeological site or the unaffected portions of sites outside of the Boulder Brush ADI.
- The fencing shall remain in place until the conclusion of grading activities, after which the fencing shall be removed.
- o Installation of temporary fencing shall require the presence of monitor(s) (archaeological and Kumeyaay Native American).

M-CR-2 Archaeological Monitoring. To mitigate for potential impacts to undiscovered, buried archaeological resources in the Boulder Brush area of direct impact (ADI), an archaeological monitoring program and potential data recovery program shall be implemented pursuant to the County of San Diego's (County's) Guidelines for Determining Significance and Report Format and Requirements for Cultural Resources and the California Environmental Quality Act (CEQA) and shall include the following requirements:

a. Pre-Construction

• The Boulder Brush Developer shall contract with a County-approved archaeologist to perform archaeological monitoring. The Project archaeologist shall contract with a Kumeyaay Native American monitor(s) to conduct Native American monitoring for the Project.

• The pre-construction meeting shall be attended by the Project archaeologist and the Kumeyaay Native American monitor(s).

b. Construction

• Monitoring. Both the Project archaeologist and Kumeyaay Native American monitor(s) are to be on site during all earth-disturbing activities. The frequency and location of monitoring of native soils shall be determined by the Project archaeologist in consultation with the Kumeyaay Native American monitor(s). Both the Project archaeologist and the Kumeyaay Native American monitor(s) shall evaluate fill soils to ensure that they are negative for cultural resources.

• Inadvertent Discoveries

- Both the Project archaeologist and the Kumeyaay Native American monitor(s) have the authority to divert or temporarily halt ground disturbance operations in the area of the discovery.
- The Project archaeologist shall contact the County archaeologist.
- The Project archaeologist, in consultation with the County archaeologist and the Kumeyaay Native American monitor(s), shall determine the significance of discovered resources.
- o Construction activities shall be allowed to resume after the County archaeologist has agreed with the significance evaluation.
- Isolates and non-significant deposits shall be minimally documented in the field. If the isolates and non-significant deposits are not be collected by the Project archaeologist, the Kumeyaay Native American monitor(s) may collect the cultural material for transfer to a tribal curation facility or repatriation program.
- o If cultural resources are determined to be significant, a research design and data recovery program shall be prepared by the Project archaeologist in consultation with the Kumeyaay Native American monitor(s) and approved by the County archaeologist. The program shall include reasonable efforts to preserve (avoid) unique cultural resources of Sacred Sites, the capping of identified Sacred Sites or unique cultural resources and placement of development over the cap if avoidance is infeasible; and data recovery for non-unique cultural resources. The preferred option is preservation (avoidance).

c. Human Remains

 The Property Owner or their representative (Boulder Brush Developer) shall contact the County coroner and the County Planning & Development Services staff archaeologist.

- Upon identification of human remains, no further disturbance shall occur in the area of the find until the County coroner has made the necessary findings as to origin. Should the human remains need to be taken off site for evaluation, they shall be accompanied by a Kumeyaay Native American monitor.
- If the remains are determined to be of Native American origin, the most likely descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be contacted by the Property Owner or their representative to determine proper treatment and disposition of the remains.
- The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by California Public Resources Code, Section 5097.98, has been conducted.
- California Public Resources Code, Section 5097.98; CEQA Guidelines, Section 15064.5; and California Health and Safety Code, Section 7050.5, shall be followed in the event that human remains are discovered.
- On the Reservation, the procedures outlined in the Native American Graves Protection and Repatriation Act (NAGPRA) will be followed. The Tribe is the responsible government agency for treatment of human remains under NAGPRA.

d. Rough Grading

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

e. Final Grading

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

f. Cultural Material Conveyance

The final report shall include the following:

- Evidence that all prehistoric materials have been curated at a San Diego curation facility or tribal curation facility that meets federal standards according to Title 36, Part 79, of the Code of Federal Regulations or alternatively have been repatriated to a culturally affiliated tribe.
- Evidence that historic materials have been curated at a San Diego curation facility that meets federal standards according to Title 36, Part 79, of the Code of Federal Regulations.
- M-CR-3 Three Resource Protection Ordinance (RPO) significant sites (CA-SDI-7140, CA-SDI-7151/7162, and CA-SDI-22581), are located on unincorporated County lands within the Boulder Brush Boundary and contain human remains. The locations of human remains at each site shall be entirely avoided by Project design.

Campo Wind Facilities

M-CR-A, M-CR-B, and M-CR-C are recommended in the EIS and would reduce potential impacts associated with cultural resources to less than significant. These measures are recommended mitigation measures in the EIS for the Campo Wind Facilities on the Reservation, subject to the BIA's record of decision.

M-CR-A Monitoring and Treatment Plan. A post-environmental review cultural resources monitoring and discoveries treatment plan (Monitoring and Treatment Plan) will be prepared prior to the start of construction and shall outline the specific requirements for monitoring at the conclusion of stakeholder consultation. The Monitoring and Treatment Plan shall clearly identify roles and responsibilities of Project personnel, and lines of communication and authority for reporting and management. The Monitoring and Treatment Plan shall include the procedures to be followed when construction results in an inadvertent discovery including work stoppage, protection of the discovery to allow for inspection by a qualified archaeologist, significance evaluation if the resource is not an isolated find, coordination with the Bureau of Indian Affairs (BIA) and developer to attempt avoidance of further effects if the resource is found to be significant, and the procedures for data recovery mitigation if avoidance is not feasible. The Monitoring and Treatment Plan shall be prepared by the developer's Secretary of the Interior-qualified archaeologist and submitted to the BIA for review and approval prior to the start of construction.

M-CR-B Archaeological and Native American Monitoring. It is anticipated that monitoring will be required for all primary ground disturbance and for extended excavations when construction encroaches on historic properties that are avoided but are near to ground-disturbing activities, and at those locations where sensitive remains or significant deposits are more likely to be unearthed during construction-related ground disturbance.

Ground-disturbing activities include, but are not limited to, brush clearance, grubbing, excavation, trenching, grading, and drilling. Any archaeological monitors shall be qualified archaeologists or work under the direct supervision of a qualified archaeologist, defined as an archaeologist meeting the Secretary of the Interior's standards for professional archaeology, and shall be approved by the Bureau of Indian Affairs (BIA). The monitors shall be familiar with the types of historical and prehistoric resources that could be encountered on the Project Site.

The archaeological monitors shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis. The archaeological monitors shall be present on the Project Site according to a schedule as detailed in the Monitoring and Treatment Plan and shall maintain a daily log of activities, which will be appended to a final monitoring report that shall be submitted to the BIA and South Coastal Information Center at the conclusion of monitoring. Specific monitoring reporting procedures shall be detailed in the Monitoring and Treatment Plan.

In the event of inadvertent discovery of human remains, all work shall immediately be halted within a 100-foot radius and temporary protective measures shall be implemented. The Developer shall immediately contact the Tribe, and follow the Native American Graves Protection and Repatriation Act (NAGPRA) plan of action provided in the Monitoring and Treatment Plan. The NAGPRA plan of action will minimally include coordination with the San Diego County Coroner (Coroner) for formal determination of the remains. If the Coroner determines that the remains are Native American, the Coroner shall contact the Native American Heritage Commission, in accordance with California Health and Safety Code, Section 7050.5c, and California Public Resources Code, Section 5097.98 (as amended by Assembly Bill 2641). The Native American Heritage Commission shall coordinate with the Tribe to identify a Most Likely Descendant for the remains per California Public Resources Code, Section 5097.98, unless the Tribe has already made such a determination. If the remains are determined to be neither of forensic value to the Coroner, nor of Native American origin, provisions of the

California Health and Safety Code (7100 et seq.) directing identification of the next of kin will apply.

M-CR-C

Significance Evaluation and Data Recovery. Requirements for treatment of inadvertent discoveries that occur during construction, operation and maintenance, and decommissioning, shall be detailed in the Monitoring and Treatment Plan (M-CR-A), and shall minimally include stoppage of all activity within 100 feet of the find until a qualified archaeologist can assess the significance of the find. The Bureau of Indian Affairs (BIA) shall also be contacted. If the qualified archaeologist, in consultation with the BIA, determines the resource is significant (i.e., qualifies as a historic property), then the archaeologist shall determine appropriate avoidance measures or other appropriate mitigation. Preservation in place shall be the preferred manner of mitigation to avoid effects on significant cultural resources. If it is demonstrated that resources cannot be feasibly avoided, the qualified archaeologist shall implement the provisions for mitigation detailed in the Monitoring and Treatment Plan. Work shall not resume within 100 feet of the discovery until permission is received from the BIA.

Where preservation in place of a significant archaeological resource is not feasible, a qualified archaeologist, in consultation with the BIA, and the Project developer shall complete archaeological data recovery. The standard for completion of data recovery may vary for individual archaeological sites, but is understood herein to be collection of a statistically representative sample of the archaeological deposits such that data redundancy is achieved and the unique properties of the archaeological sites are addressed. Implementation of data recovery mitigation shall include the following steps:

- 1. The Monitoring and Treatment Plan (M-CR-A) will include a research design and archaeological data recovery plan prior to ground disturbance for the recovery of resources in unavoidable sites that will capture those categories of data for which the site is significant, and implement the data recovery plan.
- 2. The data recovery phase shall focus on recovering archaeological data sufficient to mitigate the destruction of a portion of the site or the entire site within the area of direct impacts.
- 3. If, in the opinion of the qualified archaeologist and in light of the data available, the significance of the site is such that data recovery cannot capture the values that qualify the site for inclusion on the National Register of Historic Places (NRHP), the developer shall reconsider Project plans in light of the high value of the cultural resource, and implement more substantial modifications to the

- proposed Project that shall allow the site to be preserved intact, such as Project redesign or capping the site with fill soil.
- 4. Standard archaeological collection and/or excavation units may be used, with methods consistent with those employed during previous investigations in the region. Following completion of the excavations, all cultural materials shall be washed, cataloged, and analyzed. Technical analyses may include artifact analysis, radiocarbon dating, obsidian hydration, pollen and protein residue, and other analyses as needed to describe the cultural materials and archaeological deposits. A data recovery report shall be prepared and filed with the BIA and the South Coastal Information Center.
- 5. The Developer shall provide for the permanent curation of recovered materials during construction at a federally recognized archaeological repository, such as the San Diego Archaeological Center or the Imperial Valley Desert Museum.

For archaeological sites considered significant and eligible for NRHP listing that can be avoided, reasonable protective measures shall be provided, including protective fencing around an avoided resource with an appropriate buffer, silt fencing to avoid indirect effects through Project-related runoff, and other measures as applicable. In certain instances, avoidance through capping using sterile fill matrix, use of rubber mats, or other measures may be deemed appropriate to achieve avoidance.

2.4.7 Conclusion

Cultural resources located within the Project Area but outside of the Project ADI would be avoided by Project design. Temporary fencing and establishment of environmentally sensitive area buffers around sites located within 50 feet of potential disturbance areas (**M-CR-1**) and implementation of a Monitoring and Treatment Plan (**M-CR-A**) would reduce potential impacts to cultural resources during construction (Impact CR-1/Impact CR-A and Impact CR-4/Impact CR-D) to **less than significant**.

The Project has the potential to affect 37 cultural resources that, although they are not recommended as eligible for listing in the CRHR or the local register, are important under the County CEQA Guidelines (Impact CR-2/Impact CR-B). The importance of the sites would be mitigated through the inclusion of archaeological monitoring by a County-approved archaeologist and a Kumeyaay Native American monitor on private lands and by a Tribeapproved archaeologist and Tribal monitor on tribal land during On-Reservation grading activities (M-CR-2/M-CR-B). Monitoring would also mitigate potential impacts to unknown cultural resources to less than significant.

Sites CA-SDI-7140, CA-SDI-7151/7162, CA-SDI-8939, CA-SDI-22581, and CA-SDI-22596 are significant due to the presence of human remains (Impact CR-3/Impact CR-C). The entirety of each site would be avoided by Project design (M-CR-3). The potential impacts to CA-SDI-7140 and CA-SDI-22596 would be reduced to **less than significant** through installation of temporary fencing and implementation of a Monitoring and Treatment Plan during construction (M-CR-1/M-CR-A) and an archaeological monitoring program (M-CR-2/M-CR-B).

While the County cannot enforce mitigation measures on Reservation land, the County would recommend to the BIA that the Project also be required to implement these mitigation measures on the Reservation. As previously stated, M-CR-A, M-CR-B, and M-CR-C are recommended mitigation measures in the EIS for the Campo Wind Facilities, subject to the BIA's record of decision. Mitigation measures recommended in the EIS would reduce potential impacts to cultural resources On-Reservation.

As shown in Table 2.4-4, Management Summary, implementation of the mitigation measures would reduce impacts to cultural sites to **less than significant**.

Table 2.4-1
Frequency of Cultural Resources Identified within and outside of the Project ADI

	Boulder Brush	Campo Wind	Total
Sites in the ADI			
CRHR Eligible	0	0	0
Not CRHR Eligible	10	21	31
Subtotal	10	21	31
Sites outside of ADI			
CRHR Eligible	4	2	6
Not CRHR Eligible	6	0	6
Not Evaluated	20	15	35
Subtotal	30	17	47
Sites Total	40	38	78
Isolates in the ADI	10	2	12
Isolates out of ADI	45	9	54
Isolates Total	55	11	66
Built Environment Resources in the ADI	0	4	4
Built Environment Resources in the APE but out of the ADI	0	0	0
Grand Total*	95	53	148

Table 2.4-2 Cultural Resources within the Project ADI

Primary	Trinomial	Period	Туре
	Cultural Res	ources Identified in the Bo	oulder Brush ADI
P-37-007145	CA-SDI-7145/7146	Multi-component	Temporary Camp; Historic Refuse
P-37-007163	CA-SDI-7163	Prehistoric	Temporary Camp
P-37-038235	CA-SDI-22565	Historic	Ranching
P-37-038245	CA-SDI-22575	Prehistoric	Temporary Camp
P-37-038246	CA-SDI-22576	Prehistoric	Temporary Camp
P-37-038248	CA-SDI-22578	Historic	Rock Alignment; Historic Refuse
P-37-038249	CA-SDI-22579	Prehistoric	Bedrock Milling
P-37-038253	CA-SDI-22583	Multi-component	Lithic Scatter and Refuse Scatter
P-37-038255	CA-SDI-22585	Prehistoric	Lithic Scatter
P-37-038256	CA-SDI-22586	Multi-component	Temporary Camp; Historic Refuse Scatter
P-37-038189	N/A	Prehistoric	Isolate
P-37-038190	N/A	Prehistoric	Isolate
P-37-038204	N/A	Prehistoric	Isolate
P-37-038206	N/A	Prehistoric	Isolate
P-37-038211	N/A	Prehistoric	Isolate
P-37-038212	N/A	Prehistoric	Isolate
P-37-038213	N/A	Prehistoric	Isolate
P-37-038229	N/A	Prehistoric	Isolate
P-37-038230	N/A	Prehistoric	Isolate
P-37-038232	N/A	Prehistoric	Isolate
	Cult	ural Resources in the Car	mpo ADI
P-37-006891	CA-SDI-6891	Historic	Road
P-37-008962	CA-SDI-8962	Prehistoric	Bedrock Milling
P-37-008977	CA-SDI-8977	Multi-component	Temporary Camp; Historic Residence
P-37-009018	CA-SDI-9018	Prehistoric	Ceramic Scatter
P-37-009050	CA-SDI-9050	Historic	Government/Educational Building Remains
P-37-009059	CA-SDI-9059	Historic	Road
P-37-024023	-	Historic	Road
P-37-025680	-	Historic	Railroad
P-37-025856	CA-SDI-17205	Historic	Refuse Scatter
P-37-032166	CA-SDI-20368	Prehistoric	Habitation
P-37-032441	CA-SDI-20587	Prehistoric	Habitation
P-37-032442	CA-SDI-20588	Prehistoric	Lithic Scatter
P-37-032444	CA-SDI-20590	Historic	Refuse Scatter
P-37-032445	CA-SDI-20591	Multi-component	Historic Feature; Groundstone Tool
P-37-032446	CA-SDI-20592	Prehistoric	Habitation
P-37-032447	CA-SDI-20593	Prehistoric	Ceramic Scatter
P-37-032451	CA-SDI-20597	Prehistoric	Artifact Scatter
P-37-032458	CA-SDI-20604	Historic	Refuse Scatter

Table 2.4-2 Cultural Resources within the Project ADI

Primary	Trinomial	Period	Туре
P-37-032459	CA-SDI-20605	Prehistoric	Artifact Scatter
P-37-032462	CA-SDI-20608	Prehistoric	Bedrock Milling
P-37-038289	CA-SDI-22599	Multi-component	Refuse Scatter; Artifact Scatter
P-37-038290	CA-SDI-22600	Prehistoric	Bedrock Milling
P-37-038291	CA-SDI-22601	Prehistoric	Bedrock Milling
P-37-038292	CA-SDI-22602	Prehistoric	Artifact Scatter
P-37-038293	CA-SDI-22603	Historic	Refuse Scatter
P-37-038462	CA-SDI-22674	Prehistoric	Temporary Camp
P-37-038285*	N/A	Prehistoric	Isolate
P-37-038280*	N/A	Prehistoric	Isolate

ADI = area of direct impact; N/A = not applicable.

Table 2.4-3 Cultural Resources Outside the Project ADI

Primary	Trinomial	Period	Туре	Avoided?
Cultu	ıral Resources Identified	in the Boulder Brush A	PE but Outside the Boulder Brusi	h ADI
P-37-007138	CA-SDI-7138	Prehistoric	Rock Shelter	Yes
P-37-007140	CA-SDI-7140	Prehistoric	Temporary Camp	Yes
P-37-007148	CA-SDI-7148	Prehistoric	Artifact Scatter	Yes
P-37-007149	CA-SDI-7149	Prehistoric	Bedrock Milling	Yes
P-37-007156	CA-SDI-7156	Prehistoric	Habitation	Yes
P-37-031290	CA-SDI-19859	Prehistoric	Artifact Scatter	Yes
P-37-038238	CA-SDI-22568	Historic	Quarry	Yes
P-37-038247	CA-SDI-22577	Prehistoric	Temporary Camp	Yes
P-37-038252	CA-SDI-22582	Prehistoric	Lithic Scatter	Yes
P-37-038184	ECWEP-I-013	Prehistoric	Isolate	Yes
P-37-038187	ECWEP-I-016	Prehistoric	Isolate	Yes
P-37-038188	ECWEP-I-017	Prehistoric	Isolate	Yes
P-37-038195	TW-I-001	Prehistoric	Isolate	Yes
P-37-038196	TW-I-002	Prehistoric	Isolate	Yes
P-37-038203	TW-I-014	Prehistoric	Isolate	Yes
P-37-038205	TW-I-016	Prehistoric	Isolate	Yes
P-37-038207	TW-I-018	Prehistoric	Isolate	Yes
P-37-038209	TW-I-020	Prehistoric	Isolate	Yes
P-37-038210	TW-I-021	Prehistoric	Isolate	Yes
P-37-038214	P-37-038214 TW-I-025		Isolate	Yes
P-37-038215	TW-I-026	Prehistoric	Isolate	Yes
P-37-038463	TW-I-055	Prehistoric	Zoomorphic Rock	Yes

Table 2.4-3 Cultural Resources Outside the Project ADI

Primary	Trinomial	Period	Туре	Avoided?
	Cultural Resour	ces Identified Outside th	ne Boulder Brush APE	
P-37-004005	CA-SDI-4005	Prehistoric	Rock Shelter	Yes
P-37-007136	CA-SDI-7136	Prehistoric	Temporary Camp	Yes
P-37-007139	CA-SDI-7139	Multi-component	Ranching; Ceramic Scatter	Yes
P-37-007151	CA-SDI-7151/7162	Prehistoric	Temporary Camp	Yes
P-37-007152	CA-SDI-7152	Prehistoric	Temporary Camp	Yes
P-37-027787	CA-SDI-18048	Historic	Structure Remains	Yes
P-37-027788	CA-SDI-18049	Prehistoric	Artifact Scatter	Yes
P-37-038186	-	Historic	Ranching	Yes
P-37-038234	CA-SDI-22564	Prehistoric	Temporary Camp	Yes
P-37-038236	CA-SDI-22566	Prehistoric	Bedrock Milling	Yes
P-37-038237	CA-SDI-22567	Historic	Refuse Deposit	Yes
P-37-038239	CA-SDI-22569	Prehistoric	Lithic Scatter	Yes
P-37-038240	CA-SDI-22570	Prehistoric	Temporary Camp	Yes
P-37-038241	CA-SDI-22571	Prehistoric	Temporary Camp	Yes
P-37-038242	CA-SDI-22572	Prehistoric	Lithic Scatter	Yes
P-37-038243	CA-SDI-22573	Prehistoric	Temporary Camp	Yes
P-37-038244	CA-SDI-22574	Prehistoric	Temporary Camp	Yes
P-37-038250	CA-SDI-22580	Prehistoric	Temporary Camp	Yes
P-37-038251	CA-SDI-22581	Prehistoric	Temporary Camp	Yes
P-37-038254	CA-SDI-22584	Prehistoric	Lithic Scatter	Yes
P-37-038257	CA-SDI-22587	Prehistoric	Artifact Scatter	Yes
P-37-038258	CA-SDI-22588	Prehistoric	Temporary Camp	Yes
P-37-038259	CA-SDI-22589	Prehistoric	Ceramic Scatter	Yes
P-37-038260	CA-SDI-22590	Prehistoric	Bedrock Milling	Yes
P-37-038179	N/A	Prehistoric	Isolate	Yes
P-37-038180	N/A	Prehistoric	Isolate	Yes
P-37-038181	N/A	Prehistoric	Isolate	Yes
P-37-038182	N/A	Prehistoric	Isolate	Yes
P-37-038183	N/A	Prehistoric	Isolate	Yes
P-37-038185	N/A	Prehistoric	Isolate	Yes
P-37-038191	N/A	Prehistoric	Isolate	Yes
P-37-038192	N/A	Prehistoric	Isolate	Yes
P-37-038193	N/A	Prehistoric	Isolate	Yes
P-37-038194	N/A	Prehistoric	Isolate	Yes
P-37-038197	N/A	Prehistoric	Isolate	Yes
P-37-038198	N/A	Prehistoric	Isolate	Yes
P-37-038199	N/A	Prehistoric	Isolate	Yes
P-37-038200	N/A	Prehistoric	Isolate	Yes
P-37-038201	N/A	Prehistoric	Isolate	Yes

Table 2.4-3 Cultural Resources Outside the Project ADI

Primary	Trinomial	Period	Туре	Avoided?
P-37-038202	N/A	Historic	Isolate	Yes
P-37-038208	N/A	Prehistoric	Isolate	Yes
P-37-038216	N/A	Prehistoric	Isolate	Yes
P-37-038217	N/A	Prehistoric	Isolate	Yes
P-37-038218	N/A	Prehistoric	Isolate	Yes
P-37-038219	N/A	Prehistoric	Isolate	Yes
P-37-038220	N/A	Prehistoric	Isolate	Yes
P-37-038221	N/A	Prehistoric	Isolate	Yes
P-37-038222	N/A	Prehistoric	Isolate	Yes
P-37-038223	N/A	Prehistoric	Isolate	Yes
P-37-038224	N/A	Prehistoric	Isolate	Yes
P-37-038225	N/A	Prehistoric	Isolate	Yes
P-37-038226	N/A	Prehistoric	Isolate	Yes
P-37-038227	N/A	Prehistoric	Isolate	Yes
P-37-038228	N/A	Prehistoric	Isolate	Yes
P-37-038231	N/A	Prehistoric	Isolate	Yes
P-37-038233	N/A	Prehistoric	Isolate	Yes
	Cultural Resources Id	dentified in the Campo AP	E but outside the Campo ADI	
P-37-007258	CA-SDI-7258	Indeterminate	Bedrock Milling	Yes
P-37-008198	CA-SDI-8198	Prehistoric	Ceramic Scatter	Yes
P-37-008939	CA-SDI-8939	Prehistoric	Habitation	Yes
P-37-008945	CA-SDI-8945	Prehistoric	Rock Circle; Artifact Scatter	Yes
P-37-008946	CA-SDI-8946	Prehistoric	Bedrock Milling	Yes
P-37-008963	CA-SDI-8963	Prehistoric	Bedrock Milling	Yes
P-37-008968	CA-SDI-8968	Prehistoric	Bedrock Milling	Yes
P-37-008980	CA-SDI-8980	Prehistoric	Rock Shelter	Yes
P-37-008985	CA-SDI-8985	Prehistoric	Bedrock Milling	Yes
P-37-008986	CA-SDI-8986	Prehistoric	Bedrock Milling	Yes
P-37-032440	CA-SDI-20586	Prehistoric	Lithic Scatter	Yes
P-37-032448	CA-SDI-20594	Multi-component	Artifact Scatter; Refuse Scatter	Yes
P-37-032452	CA-SDI-20598	Prehistoric	Temporary Camp	Yes
P-37-032453	CA-SDI-20599	Prehistoric	Bedrock Milling	Yes
P-37-032461	CA-SDI-20607	Prehistoric	Artifact Scatter	Yes
P-37-032464	CA-SDI-20610	Historic	Refuse Scatter	Yes
P-37-032465	CA-SDI-20611	Historic	Refuse Scatter	Yes
P-37-035283	CA-SDI-21776	Prehistoric	Temporary Camp	Yes
P-37-038279	CA-SDI-22595	Prehistoric	Habitation	Yes
P-37-038281	CA-SDI-22596	Multi-component	Ceramic Scatter; Human Remains; Refuse Scatter	Yes

Table 2.4-3 Cultural Resources Outside the Project ADI

Primary	Trinomial	Period	Туре	Avoided?
P-37-038282	CA-SDI-22597	Historic	Refuse Scatter	Yes
P-37-038288	CA-SDI-22598	Historic	Refuse Scatter	Yes
P-37-032854	N/A	Prehistoric	Isolate	Yes
P-37-038274	N/A	Prehistoric	Isolate	Yes
P-37-038275	N/A	Prehistoric	Isolate	Yes
P-37-038276	N/A	Prehistoric	Isolate	Yes
P-37-038277	N/A	Prehistoric	Isolate	Yes
P-37-038278	N/A	Prehistoric	Isolate	Yes
P-37-038283	N/A	Prehistoric	Isolate	Yes
P-37-038284	N/A	Prehistoric	Isolate	Yes
P-37-038286	N/A	Prehistoric	Isolate	Yes
P-37-038287	N/A	Prehistoric	Isolate	Yes

APE = area of potential effects; ADI = area of direct impact; N/A = not applicable; TCR = Tribal cultural resource.

Table 2.4-4
Management Summary

Resource Number	Period	Significance/ Eligibility Status	Impact	Recommendations/ Mitigation Measures	Impact Significance After Mitigation
	Resour	ces Completely or Partially Inters	secting the Bo	ulder Brush ADI	
CA-SDI- 7145/7146	Multi- component	County: Important; (Within ADI: CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible; Outside ADI: CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible)	Significant	Avoidance (outside ADI), Evaluation, Research, Collection, Curation or Repatriation, Monitoring, Temporary Fencing	Less Than Significant
CA-SDI-7163	Multi- component	County: Important; (Within ADI: CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible; Outside ADI: CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible)	Significant	Avoidance (outside ADI), Evaluation, Research, Collection, Curation or Repatriation, Monitoring, Temporary Fencing	Less Than Significant

Table 2.4-4 Management Summary

Resource Number	Period	Significance/ Eligibility Status	Impact	Recommendations/ Mitigation Measures	Impact Significance After Mitigation
CA-SDI-22565	Prehistoric	County: Important; (Within ADI: CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible; Outside ADI: CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible)	Significant	Avoidance (outside ADI), Evaluation, Research, Collection, Curation or Repatriation, Monitoring, Temporary Fencing	Less Than Significant
CA-SDI-22575	Prehistoric	County: Important; (Within ADI: CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible; Outside ADI: CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible)	Significant	Avoidance (outside ADI), Evaluation, Research, Collection, Curation or Repatriation, Monitoring, Temporary Fencing	Less Than Significant
CA-SDI-22576	Prehistoric	County: Important; (Within ADI: CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible; Outside ADI: CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible)	Significant	Avoidance (outside ADI), Evaluation, Research, Collection, Curation or Repatriation, Monitoring, Temporary Fencing	Less Than Significant
CA-SDI-22578	Historic	County: Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Avoided/ Not Significant	Evaluation, Research, Collection, Curation or Repatriation, Monitoring	Not Significant
CA-SDI-22579	Prehistoric	County: Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Significant	Evaluation, Research, Collection, Curation or Repatriation, Monitoring	Less Than Significant
CA-SDI-22583	Multi- component	County: Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Significant	Evaluation, Research, Collection, Curation or Repatriation, Monitoring	Less Than Significant

Table 2.4-4 Management Summary

Resource Number	Period	Significance/ Eligibility Status	Impact	Recommendations/ Mitigation Measures	Impact Significance After Mitigation
CA-SDI-22585	Prehistoric	County: Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Significant	Evaluation, Research, Collection, Curation or Repatriation, Monitoring	Less Than Significant
CA-SDI-22586	Prehistoric	County: Important; (Within ADI: CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible; Outside ADI: CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible)	Significant	Avoidance (outside ADI), Evaluation, Research, Collection, Curation or Repatriation, Monitoring, Temporary Fencing	Less Than Significant
P-37-038189	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038190	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038204	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038206	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038211	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038212	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant

Table 2.4-4 Management Summary

Resource Number	Period	Significance/ Eligibility Status	Impact	Recommendations/ Mitigation Measures	Impact Significance After Mitigation
P-37-038213	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038229	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038230	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038232	Prehistoric	County: Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
		Resources Outside the Bo	ulder Brush A	DI	
CA-SDI-4005	Prehistoric	Not Relocated	Not Significant	N/A	Not Significant
CA-SDI-7136	Prehistoric	County: Important; CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring,	Not Significant
CA-SDI-7138	Prehistoric	Not Relocated	Not Significant	N/A	Not Significant
CA-SDI-7139	Multi- component	County: Important; (Evaluated Portion: CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible; Unevaluated Portion: CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible)	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring,	Not Significant

Table 2.4-4 Management Summary

Resource Number	Period	Significance/ Eligibility Status	Impact	Recommendations/ Mitigation Measures	Impact Significance After Mitigation
CA-SDI-7140	Prehistoric	County: Important; CEQA: Significant; RPO: Significant; CRHR: Not Eligible; Local Register: Not Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring, Temporary Fencing	Not Significant
CA-SDI-7148	Prehistoric	Not Relocated	Not Significant	N/A	Not Significant
CA-SDI-7149	Prehistoric	Not Relocated	Not Significant	N/A	Not Significant
CA-SDI- 7151/7162	Prehistoric	County: Important; CEQA: Significant; RPO: Significant; CRHR: Eligible; Local Register: Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring	Not Significant
CA-SDI-7152	Prehistoric	County: Important; (Evaluated Portion: CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible; Unevaluated Portion: CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible)	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring	Not Significant
CA-SDI-7156	Prehistoric	County: Important; CEQA: Significant; CRHR: Eligible; RPO: Not Evaluated; Local Register: Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring	Not Significant
CA-SDI-18048	Historic	County: Important; CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring,	Not Significant
CA-SDI-18049	Prehistoric	County: Important; CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring,	Not Significant

Table 2.4-4 Management Summary

Resource Number	Period	Significance/ Eligibility Status	Impact	Recommendations/ Mitigation Measures	Impact Significance After Mitigation
CA-SDI-19859	Prehistoric	County: Important; CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring, Temporary Fencing	Not Significant
CA-SDI-22564	Prehistoric	County: Important; CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring;	Not Significant
CA-SDI-22566	Prehistoric	County: Important; (Evaluated Portion: CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible; Unevaluated Portion: CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible)	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring	Not Significant
CA-SDI-22567	Historic	County: Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring	Not Significant
CA-SDI-22568	Multi- component	County: Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Avoided/ Not Significant	Evaluation, Research, Collection, Curation or Repatriation, Monitoring	Less Than Significant
CA-SDI-22569	Prehistoric	County: Important; CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring	Not Significant
CA-SDI-22570	Prehistoric	County: Important; (Evaluated Portion: CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not	Avoided/ Not Significant	Evaluation, Research, Collection, Curation or Repatriation, Monitoring	Less Than Significant

Table 2.4-4 Management Summary

Resource Number	Period	Significance/ Eligibility Status	Impact	Recommendations/ Mitigation Measures	Impact Significance After Mitigation
		Eligible; Unevaluated Portion: CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible)	·		
CA-SDI-22571	Prehistoric	County: Important; CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring	Not Significant
CA-SDI-22572	Prehistoric	County: Important; CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring	Not Significant
CA-SDI-22573	Prehistoric	County: Important; CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring	Not Significant
CA-SDI-22574	Prehistoric	County: Important; CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring	Not Significant
CA-SDI-22577	Prehistoric	County: Important; CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring, Temporary Fencing	Not Significant
CA-SDI-22580	Prehistoric	County: Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Avoided/ Not Significant	Evaluation, Research, Collection, Curation or Repatriation, Monitoring	Less Than Significant

Table 2.4-4 Management Summary

Resource Number	Period	Significance/ Eligibility Status	Impact	Recommendations/ Mitigation Measures	Impact Significance After Mitigation
CA-SDI- 22581	Prehistoric	County: Important; CEQA: Significant; RPO: Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring;	Not Significant
CA-SDI-22582	Prehistoric	County: Important; CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring	Not Significant
CA-SDI-22584	Prehistoric	County: Important; CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring	Not Significant
CA-SDI-22587	Prehistoric	County: Important; CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring	Not Significant
CA-SDI-22588	Prehistoric	County: Important; CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring	Not Significant
CA-SDI-22589	Prehistoric	County: Important; CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring	Not Significant
CA-SDI-22590	Prehistoric	County: Important; CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring	Not Significant

Table 2.4-4 Management Summary

Resource Number	Period	Significance/ Eligibility Status	Impact	Recommendations/ Mitigation Measures	Impact Significance After Mitigation
P-37-038186	Historic	County: Important; CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring	Not Significant
P-37-038179	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038180	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038181	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038182	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038183	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038184	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038185	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant

Table 2.4-4 Management Summary

Resource Number	Period	Significance/ Eligibility Status	Impact	Recommendations/ Mitigation Measures	Impact Significance After Mitigation
P-37-038187	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038188	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038191	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038192	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038193	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038194	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038195	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038196	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant

Table 2.4-4 Management Summary

Resource Number	Period	Significance/ Eligibility Status	Impact	Recommendations/ Mitigation Measures	Impact Significance After Mitigation
P-37-038197	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038198	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038199	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038200	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038201	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038202	Historic	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038203	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038205	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant

Table 2.4-4 Management Summary

Resource Number	Period	Significance/ Eligibility Status	Impact	Recommendations/ Mitigation Measures	Impact Significance After Mitigation
P-37-038207	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038208	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038209	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038210	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038214	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038215	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038216	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038217	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant

Table 2.4-4 Management Summary

Resource Number	Period	Significance/ Eligibility Status	Impact	Recommendations/ Mitigation Measures	Impact Significance After Mitigation
P-37-038218	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038219	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038220	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038221	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038222	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038223	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038224	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038225	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant

Table 2.4-4 Management Summary

Resource Number	Period	Significance/ Eligibility Status	Impact	Recommendations/ Mitigation Measures	Impact Significance After Mitigation
P-37-038226	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038227	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038228	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038231	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038233	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038463	Prehistoric	County: Important; CEQA: Significant; RPO: Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible	Not Significant	N/A	Not Significant
		Resources Intersecting t	he Campo AD	l	
CA-SDI-8962	Prehistoric	Not Relocated	Not Significant	N/A	Not Significant
CA-SDI-6891	Historic	County: Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	Avoidance – Preserve in Place	Not Significant
CA-SDI-8977	Multi- component	County: Important; (Within ADI: CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible; Outside ADI: CEQA: Not Evaluated; RPO:	Significant	Avoidance (Outside ADI), Evaluation, Research, Collection, Curation or Repatriation, Monitoring, Temporary Fencing	Less Than Significant

Table 2.4-4 Management Summary

Resource Number	Period	Significance/ Eligibility Status	Impact	Recommendations/ Mitigation Measures	Impact Significance After Mitigation
		Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible)			
CA-SDI-9018	Prehistoric	County: Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Significant	Evaluation, Research, Collection, Curation or Repatriation, Monitoring	Less Than Significant
CA-SDI-9050	Historic	County: Important; (Within ADI: CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible; Outside ADI: CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible)	Significant	Avoidance (Outside ADI), Evaluation, Research, Collection, Curation or Repatriation, Monitoring, Temporary Fencing	Less Than Significant
CA-SDI-9059	Historic	County: Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Significant	Avoidance (Outside ADI); Evaluation, Research, Collection, Curation or Repatriation, Monitoring	Less Than Significant
CA-SDI-17205	Historic	County: Important; (Within the ADI: CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible; Outside ADI: CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible)	Significant	Avoidance (Outside ADI); Evaluation, Research, Collection, Curation or Repatriation, Monitoring, Temporary Fencing	Less Than Significant
CA-SDI-20368	Prehistoric	County: Important; (Within ADI: CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible; Outside ADI: CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible)	Significant	Avoidance (Outside ADI), Evaluation, Research, Collection, Curation or Repatriation, Monitoring, Temporary Fencing	Less Than Significant

Table 2.4-4 Management Summary

Resource Number	Period	Significance/ Eligibility Status	Impact	Recommendations/ Mitigation Measures	Impact Significance After Mitigation
CA-SDI-20587	Prehistoric	County: Important; (Within ADI: CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible; Outside ADI: CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible)	Significant	Avoidance (Outside ADI), Evaluation, Research, Collection, Curation or Repatriation, Monitoring, Temporary Fencing	Less Than Significant
CA-SDI-20588	Prehistoric	County: Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Significant	Evaluation, Research, Collection, Curation or Repatriation, Monitoring	Less Than Significant
CA-SDI-20590	Historic	County: Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Significant	Evaluation, Research, Collection, Curation or Repatriation, Monitoring	Less Than Significant
CA-SDI-20591	Multi- component	County: Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Significant	Evaluation, Research, Collection, Curation or Repatriation, Monitoring	Less Than Significant
CA-SDI-20592	Prehistoric	County: Important; (Within ADI: CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible; Outside ADI: CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible)	Avoided/ Not Significant	Avoidance (Outside ADI), Evaluation, Research, Collection, Curation or Repatriation, Monitoring; Temporary Fencing	Not Significant
CA-SDI-20593	Prehistoric	County: Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Significant	Evaluation, Research, Collection, Curation or Repatriation, Monitoring	Less Than Significant
CA-SDI-20597	Prehistoric	County: Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Significant	Evaluation, Research, Collection, Curation or Repatriation, Monitoring	Less Than Significant

Table 2.4-4 Management Summary

Resource Number	Period	Significance/ Eligibility Status	Impact	Recommendations/ Mitigation Measures	Impact Significance After Mitigation
CA-SDI-20604	Historic	County: Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Significant	Evaluation, Research, Collection, Curation or Repatriation, Monitoring	Less Than Significant
CA-SDI-20605	Prehistoric	County: Important; (Within ADI: CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible; Outside ADI: CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible)	Avoided/ Not Significant	Avoidance (Outside ADI), Evaluation, Research, Collection, Curation or Repatriation, Monitoring; Temporary Fencing	Not Significant
CA-SDI-20608	Prehistoric	County: Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Significant	Evaluation, Research, Collection, Curation or Repatriation, Monitoring	Less Than Significant
CA-SDI-22599	Multi- component	County: Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Significant	Evaluation, Research, Collection, Curation or Repatriation, Monitoring	Less Than Significant
CA-SDI-22600	Prehistoric	County: Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Significant	Evaluation, Research, Collection, Curation or Repatriation, Monitoring	Less Than Significant
CA-SDI-22601	Prehistoric	County: Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Significant	Evaluation, Research, Collection, Curation or Repatriation, Monitoring	Less Than Significant
CA-SDI-22602	Prehistoric	County: Important; (Within ADI: CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible; Outside ADI: CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible)	Avoided/ Not Significant	Avoidance (Outside ADI), Evaluation, Research, Collection, Curation or Repatriation, Monitoring; Temporary Fencing	Not Significant

Table 2.4-4 Management Summary

Resource Number	Period	Significance/ Eligibility Status	Impact	Recommendations/ Mitigation Measures	Impact Significance After Mitigation
CA-SDI-22603	Historic	County: Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Significant	Evaluation, Research, Collection, Curation or Repatriation, Monitoring	Less Than Significant
CA-SDI-22674	Prehistoric	County: Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Significant	Evaluation, Research, Collection, Curation or Repatriation, Monitoring	Less Than Significant
P-37-024023	Historic	CEQA: Significant; RPO: Not Significant; CRHR: Eligible; Local Register: Eligible	Significant	Avoidance by Project Design	Less Than Significant
P-37-025680	Historic	CEQA: Not Evaluated; RPO: Not Evaluated; CRHR: Not Evaluated; Local Register: Not Evaluated	Significant	Avoidance by Project Design; Directional Drilling or Overhead Lines; Reduced Work Area; Limit work on BIA Road 15	Less Than Significant
P-37-038280	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038285	Prehistoric	County: Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
		Resources Outside the	Campo ADI		
CA-SDI-7258	Indeterminate	Not relocated	Not Significant	N/A	Not Significant
CA-SDI-8198	Prehistoric	Not relocated	Not Significant	N/A	Not Significant
CA-SDI-8939	Prehistoric	County: Important; CEQA: Significant; RPO: Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring;	Not Significant

Table 2.4-4 Management Summary

Resource Number	Period	Significance/ Eligibility Status	Impact	Recommendations/ Mitigation Measures	Impact Significance After Mitigation
CA-SDI-8945	Prehistoric	County: Important; CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring,	Not Significant
CA-SDI-8946	Prehistoric	Not Relocated	Not Significant	N/A	Not Significant
CA-SDI-8963	Prehistoric	County: Important; CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring,	Not Significant
CA-SDI-8968	Prehistoric	Not Relocated	Not Significant	N/A	Not Significant
CA-SDI-8980	Prehistoric	Not Relocated	Not Significant	N/A	Not Significant
CA-SDI-8985	Prehistoric	County: Important; CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring,	Not Significant
CA-SDI-8986	Prehistoric	County: Important; CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring,	Not Significant
CA-SDI-20586	Prehistoric	County: Important; CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring, Temporary Fencing	Not Significant
CA-SDI-20594	Multi- component	County: Important; CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring,	Not Significant

Table 2.4-4 Management Summary

Resource Number	Period	Significance/ Eligibility Status	Impact	Recommendations/ Mitigation Measures	Impact Significance After Mitigation
CA-SDI-20598	Prehistoric	County: Important; CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring, Temporary Fencing	Not Significant
CA-SDI-20599	Prehistoric	County: Important; CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring,	Not Significant
CA-SDI-20607	Prehistoric	County: Important; CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring,	Not Significant
CA-SDI-20610	Historic	County: Important; CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring,	Not Significant
CA-SDI-20611	Historic	County: Important; CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring, Temporary Fencing	Not Significant
CA-SDI-21776	Prehistoric	County: Important; CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring,	Not Significant
CA-SDI-22595	Prehistoric	County: Important; CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring, Temporary Fencing	Not Significant

Table 2.4-4 Management Summary

Resource Number	Period	Significance/ Eligibility Status	Impact	Recommendations/ Mitigation Measures	Impact Significance After Mitigation
CA-SDI- 22596	Multi- component	County: Important; CEQA: Significant; RPO: Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring, Temporary Fencing	Not Significant
CA-SDI-22597	Historic	County: Important; CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring,	Not Significant
CA-SDI-22598	Historic	County: Important; CEQA: Not Evaluated; RPO: Potentially Significant; CRHR: Potentially Eligible; Local Register: Potentially Eligible	Avoided/ Not Significant	Avoidance, Evaluation, Research, Collection, Curation or Repatriation, Monitoring, Temporary Fencing	Not Significant
P-37-032854	Prehistoric	Not Relocated	Not Significant	N/A	Not Significant
P-37-038274	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038275	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038276	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038277	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038278	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant

Table 2.4-4
Management Summary

Resource Number	Period	Significance/ Eligibility Status	Impact	Recommendations/ Mitigation Measures	Impact Significance After Mitigation
P-37-038283	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038284	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038286	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant
P-37-038287	Prehistoric	County: Not Important; CEQA: Not Significant; RPO: Not Significant; CRHR: Not Eligible; Local Register: Not Eligible	Not Significant	N/A	Not Significant

ADI = area of direct impact; CEQA = California Environmental Quality Act; County = County of San Diego; CRHR = California Register of Historical Resources; RPO: Resource Protection Ordinance.

Table 2.4-5
Resource Mitigation Measures

Boulder Brush Facilities Impacted Resources (Includes Portions of Sites Intersecting ADI)				
Site Numbers	Mitigation Measures			
CA-SDI-7145/7146 (outside ADI); CA-SDI-7163 (outside ADI); CA-SDI-22565 (Outside ADI); CA-SDI-22575 (outside ADI); CA-SDI-22576 (outside ADI); CA-SDI-22586 (outside ADI);	Avoidance by Project Design and Preservation in Place			
CA-SDI-7145/7146 CA-SDI-7163 CA-SDI-22565; CA-SDI-22575; CA-SDI-22576; CA-SDI-22578; CA-SDI-22579; CA-SDI-22583; CA-SDI-22585; CA-SDI-22586	Evaluation			
CA-SDI-7145/7146 CA-SDI-7163 CA-SDI-22565; CA-SDI-22575; CA-SDI-22576; CA-SDI-22578; CA-SDI-22579; CA-SDI-22583; CA-SDI-22586	Research			
CA-SDI-7145/7146 CA-SDI-7163 CA-SDI-22565; CA-SDI-22575; CA-SDI-22576; CA-SDI-22578; CA-SDI-22579; CA-SDI-22583; CA-SDI-22585; CA-SDI-22586	Curation or Repatriation			

Table 2.4-5
Resource Mitigation Measures

Boulder Brush Facilities Impacted Resources	s (Includes Portions of Sites Intersecting ADI)
Site Numbers	Mitigation Measures
CA-SDI-7145/7146 CA-SDI-7163 CA-SDI-22565; CA-SDI-22575; CA-SDI-22576; CA-SDI-22578; CA-SDI-22579; CA-SDI-22583; CA-SDI-22585; CA-SDI-22586	Monitoring
CA-SDI-7145/7146 (outside ADI); CA-SDI-7163 (outside ADI); CA-SDI-22565 (outside ADI); CA-SDI-22575 (outside ADI); CA-SDI-22576 (outside ADI); CA-SDI-22586 (outside ADI);	Temporary Fencing
P-37-038189; P-37-038190; P-37-038204; P-37-038206;; P-37-038211; P-37-038212; P-37-038213; P-37-038229; P-37-038230; P-37-038232;	None – Isolate or Resource Does Not Exist
Boulder Brush Facilities Avoide	ed Resources (Outside the ADI)
Site Numbers	Mitigation Measures
CA-SDI-7136; CA-SDI-7139; CA-SDI-7140; CA-SDI-7151/7162; CA-SDI-7152; CA-SDI-7156; CA-SDI-18048; CA-SDI-18049; CA-SDI-19859; CA-SDI-22564; CA-SDI-22566; CA-SDI-22567; CA-SDI-22568; CA-SDI-22569; CA-SDI-22570; CA-SDI-22571; CA-SDI-22572; CA-SDI-22573; CA-SDI-22574; CA-SDI-22577; CA-SDI-22580; CA-SDI-22581; CA-SDI-22582; CA-SDI-22584; CA-SDI-22587; CA-SDI-22588; CA-SDI-22589; CA-SDI-22589; CA-SDI-22580; CA-	Avoided - Preservation In Place
CA-SDI-7136; CA-SDI-7139; CA-SDI-7140; CA-SDI-7151/7162; CA-SDI-7152; CA-SDI-7156; CA-SDI-18048; CA-SDI-18049; CA-SDI-19859; CA-SDI-22564; CA-SDI-22566; CA-SDI-22567; CA-SDI-22568; CA-SDI-22569; CA-SDI-22570; CA-SDI-22571; CA-SDI-22572; CA-SDI-22573; CA-SDI-22574; CA-SDI-22577; CA-SDI-22580; CA-SDI-22581; CA-SDI-22582; CA-SDI-22584; CA-SDI-22587; CA-SDI-22588; CA-SDI-22589; CA-SDI-22589; CA-SDI-22580; CA-	Evaluation
CA-SDI-7136; CA-SDI-7139; CA-SDI-7140; CA-SDI-7151/7162; CA-SDI-7152; CA-SDI-7156; CA-SDI-18048; CA-SDI-18049; CA-SDI-19859; CA-SDI-22564; CA-SDI-22566; CA-SDI-22567; CA-SDI-22568; CA-SDI-22569; CA-SDI-22570; CA-SDI-22571; CA-SDI-22572; CA-SDI-22573; CA-SDI-22574; CA-SDI-22577; CA-SDI-22580; CA-SDI-22581; CA-SDI-22582; CA-SDI-22584; CA-SDI-22587; CA-SDI-22588; CA-SDI-22589; CA-SDI-22589; CA-SDI-22580; P-37-038186;	Research
CA-SDI-7136; CA-SDI-7139; CA-SDI-7140; CA-SDI-7151/7162; CA-SDI-7152; CA-SDI-7156; CA-SDI-18048; CA-SDI-18049; CA-SDI-19859; CA-SDI-22564; CA-SDI-22566; CA-SDI-22567; CA-SDI-22568; CA-SDI-22569; CA-SDI-22570; CA-SDI-22571; CA-SDI-22572; CA-SDI-22573; CA-SDI-22574; CA-SDI-22577; CA-SDI-22580; CA-SDI-22581; CA-SDI-22582; CA-SDI-22584; CA-SDI-22587; CA-SDI-22588; CA-SDI-22589; CA-SDI-22589; CA-SDI-22580; P-37-038186;	Curation or Repatriation

Table 2.4-5
Resource Mitigation Measures

Boulder Brush Facilities Impacted Resources	s (Includes Portions of Sites Intersecting ADI)
Site Numbers	Mitigation Measures
CA-SDI-7136; CA-SDI-7139; CA-SDI-7140; CA-SDI-7151/7162; CA-SDI-7152; CA-SDI-7156; CA-SDI-18048; CA-SDI-18049; CA-SDI-19859; CA-SDI-22564; CA-SDI-22566; CA-SDI-22567; CA-SDI-22568; CA-SDI-22569; CA-SDI-22571; CA-SDI-22572; CA-SDI-22573; CA-SDI-22574; CA-SDI-22577; CA-SDI-22580; CA-SDI-22581; CA-SDI-22582; CA-SDI-22584; CA-SDI-22587; CA-SDI-22588; CA-SDI-22589; CA-SDI-22589; CA-SDI-22580; P-37-038186;	Monitoring
CA-SDI-7140; CA-SDI-19859; CA-SDI-22577	Temporary Fencing
CA-SDI-4005; CA-SDI-7138; CA-SDI-7148; CA-SDI-7149; P-37-038179; P-37-038180; P-37-038181; P-37-038182; P-37-038183; P-37-038184; P-37-038195; P-3738187; P-37-038188; P-37-I-038191; P-37038192; P-37038193; P-37-038194; P-37038195; P-37038196; P-37038197; P-37-038198; P-37038199; P-37038200; P-37038201; P-37-038202; P-37038203; P-37038205; P-37038207; P-37-038208; P-37038209; P-37038210; P-37038214; P-37-038215; P-37038216; P-37038217; P-37038218; P-37-038219; P-37038220; P-37038221; P-37038222; P-37-038223, P-37038224; P-37038225; P-37038226; P-37-038227; P-37038228; P-37-038231; P-37-038233, P-37-038463	None – Isolate or Resource Does Not Exist
Campo Wind Facilities Impacted Resources	(Includes Portions of Sites Intersecting ADI)
Site Numbers	Mitigation Measures
CA-SDI-6891; CA-SDI-8977 (outside ADI); CA-SDI-9050 (outside ADI); CA-SDI-9059 (outside ADI); CA-SDI-17205 (Outside ADI); CA-CA-SDI-20368 (outside ADI); CA-SDI-20587 (outside ADI); CA-SDI-20592 (outside ADI); CA-SDI-20605 (outside); CA-SDI-22602 (outside ADI); P-37-024023 (outside ADI); PP-37-025680 (outside ADI)	Avoidance by Project Design
CA-SDI-8977 CA-SDI-9018; CA-SDI-9050; CA-SDI-9059; CA-SDI-17205; CA-SDI-20368; CA-SDI-20587; CA-SDI-20588; CA-SDI-20590; CA-SDI-20591; CA-SDI-20592; CA-SDI-20593; CA-SDI-20597; CA-SDI-20604; CA-SDI-20605; CA-SDI-20608; CA-SDI-22599; CA-SDI-22600; CA-SDI-22601 CA-SDI-22602; CA-SDI-22603; CA-SDI-22674;	Evaluation
CA-SDI-8977; CA-SDI-9018; CA-SDI-9050; CA-SDI-9059; CA-SDI-17205; CA-SDI-20368; CA-SDI-20587; CA-SDI-20588; CA-SDI-20590; CA-SDI-20591; CA-SDI-20592; CA-SDI-20593; CA-SDI-20597; CA-SDI-20604; CA-SDI-20605; CA-SDI-20608; CA-SDI-22599; CA-SDI-22600; CA-SDI-22601 CA-SDI-22602; CA-SDI-22603; CA-SDI-22674; P-37-024023; P-37-025680	Research
CA-SDI-8977; CA-SDI-9018; CA-SDI-9050; CA-SDI-9059; CA-SDI-17205; CA-SDI- 20368; CA-SDI-20587; CA-SDI-20588; CA-SDI-20590; CA-SDI-20591; CA-SDI-20592; CA-	Curation or Repatriation

Table 2.4-5
Resource Mitigation Measures

Roulder Brush Facilities Impacted Passurce	s (Includes Portions of Sites Intersecting ADI)
Site Numbers	Mitigation Measures
SDI-20593; CA-SDI-20597; CA-SDI-20604; CA-SDI-20605; CA-SDI-20608; CA-SDI-22599; CA-SDI-22600; CA-SDI-22601 CA-SDI-22602; CA-SDI-22603; CA-SDI-22674; P-37-024023; P-37-025680	magator model of
CA-SDI-8977; CA-SDI-9018; CA-SDI-9050; CA-SDI-9059; CA-SDI-17205; CA-SDI-20368; CA-SDI-20587; CA-SDI-20588; CA-SDI-20590; CA-SDI-20591; CA-SDI-20592; CA-SDI-20593; CA-SDI-20597; CA-SDI-20604; CA-SDI-20605; CA-SDI-20608; CA-SDI-22599; CA-SDI-22600; CA-SDI-22601 CA-SDI-22602; CA-SDI-22603; CA-SDI-22674;	Monitoring
CA-SDI-8977 (outside ADI); (CA-SDI-9050 (outside ADI); CA-SDI-20368 (outside ADI); CA-SDI-20587 (outside ADI); CA-SDI-20592 (outside ADI); CA-SDI-20605 (outside ADI); CA-SDI-22602 (outside ADI)	Temporary Fencing
CA-SDI-8962; P-37-038280; P-37-038285	None – Isolate or Resource Does Not Exist
P-37-024023	Avoidance – No Modification of existing road allowed
P-37-025680	Directional Drilling and/or Overhead Collector Lines; Reduced Turbine Pad; Limit Modifications of BIA Road 15
Campo Wind Facilities Avoi	ded Resources (Outside ADI)
Site Numbers	Mitigation Measures
CA-SDI-8939; CA-SDI-8945; CA-SDI-8963; CA-SDI-8985; CA-SDI-8986; CA-SDI-20586; CA-SDI-20594; CA-SDI-20598; CA-SDI-20599; CA-SDI-20607; CA-SDI-20610; CA-SDI-20611; CA-SDI-21776; CA-SDI-22595; CA-SDI-22596; CA-SDI-22597; CA-SDI-22598;	Avoided - Preserved in Place
CA-SDI-8939; CA-SDI-8945; CA-SDI-8963; CA-SDI-8985; CA-SDI-8986; CA-SDI-20586; CA-SDI-20594; CA-SDI-20598; CA-SDI-20599; CA-SDI-20607; CA-SDI-20610; CA-SDI-20611; CA-SDI-21776; CA-SDI-22595; CA-SDI-22596; CA-SDI-22597; CA-SDI-22598;	Evaluation
CA-SDI-8939; CA-SDI-8945; CA-SDI-8963; CA-SDI-8985; CA-SDI-8986; CA-SDI-20586; CA-SDI-20594; CA-SDI-20598; CA-SDI-20599; CA-SDI-20607; CA-SDI-20610; CA-SDI-20611; CA-SDI-21776; CA-SDI-22595; CA-SDI-22596; CA-SDI-22597; CA-SDI-22598;	Research
CA-SDI-8939; CA-SDI-8945; CA-SDI-8963; CA-SDI-8985; CA-SDI-8986; CA-SDI-20586; CA-SDI-20594; CA-SDI-20598; CA-SDI-20599; CA-SDI-20607; CA-SDI-20610; CA-SDI-20611; CA-SDI-21776; CA-SDI-22595; CA-SDI-22596; CA-SDI-22597; CA-SDI-22598;	Curation or Repatriation
CA-SDI-8939; CA-SDI-8945; CA-SDI-8963; CA-SDI-8985; CA-SDI-8986; CA-SDI-20586; CA-SDI-20594; CA-SDI-20598; CA-SDI-20599; CA-SDI-20607; CA-SDI-20610; CA-SDI-20611; CA-SDI-21776; CA-SDI-22595; CA-SDI-22596; CA-SDI-22597; CA-SDI-22598;	Monitoring

Table 2.4-5
Resource Mitigation Measures

Boulder Brush Facilities Impacted Resources (Includes Portions of Sites Intersecting ADI)			
Site Numbers	Mitigation Measures		
CA-SDI-20586; CA-SDI-20598; CA-SDI-20611; CA-SDI- 22595; CA-SDI-22596; CA-SDI-22598	Temporary Fencing		
CA-SDI-7258; CA-SDI-8198; CA-SDI-8946; CA-SDI-8968; CA-SDI-8980; P-37-032854; P-37-038274; P-37-038275; P-37-038276; P-37-038277; P-37-038287; P-37-038284; P-37-038286; P-37-038287	None – Isolate or Resource Does Not Exist		

ADI = area of direct impact.

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