Letter O-4 – San Diego County Archaeological Society

O-4-1 The County acknowledges and appreciates the introductory comment. The comment will be included as part of the FEIR and considered by the decision makers. The comment provides introductory information that does not raise any issue or include any substantive comment with regard to the adequacy of the DEIR. For that reason, the County provides no further response to this comment.

O-4-2 The County acknowledges and appreciates the comment. The comment expresses concern regarding potential impacts to archaeological sites within "defensible space" adjacent to development and within open space easements. The County understands that the reference to "defensible space" within the context of the comment is referring to acreage subject to fuel modification. However, fuel modification in open space areas would be limited to mowing of vegetation, which would not impact any archaeological sites. No fuel modification actions are allowed in open space areas where native vegetation and cultural resources are preserved. Therefore, mitigation is not necessary. As to those areas subject to development (i.e., areas not designated as open space), fuel modification for defensible areas within the limits of the grading and brushing envelope of the development is addressed within the overall brushing and grading mitigation. That is, potential impacts arising from any fuel modification actions would be addressed through mitigation addressing the proposed Project's direct impacts, including mitigation measure M-CR-1, which includes among its provisions a requirement that all brushing and grading activities within the Project site be monitored on a full-time basis by one or more archaeologists. In the event any not previously recorded resources are encountered, the action shall be temporarily halted or redirected to another area while the nature of the discovery is evaluated. The resource shall be tested to determine its significance and, if determined significant, a data recovery program shall be implemented consistent with the mitigation measures. Where this action will require data recovery, the scope of that study has been presented in the Brian F. Smith & Associates, Inc. technical report, which is included as Appendix C-4 of the DEIR.

O-4-3 The County acknowledges and appreciates the comment. However, any potential impacts to archaeological sites caused by firefighting activities that may or may not occur on open space easement lands would be speculative. In this regard, the proposed Project’s Fire Protection Plan (see DEIR, Appendix C-21) reflects the County’s best efforts at anticipating potential impacts associated with emergency firefighting activities. Due to the general nature of this comment, however, no further response is provided.

O-4-4 The County agrees with the comment. Artifacts from all phases of archaeological work within Otay Ranch Village 13 will be located and curated as a condition of approval for this Project.