Response to Comment Letter O5

San Diego County Archaeological Society Inc.
James Royle
February 10, 2014

O5-1 This comment is introductory in nature and does not raise a significant environmental issue for which a response is required. Specific comments on the Proposed Project are addressed below.

O5-2 The County of San Diego (County) concurs with this comment, which states that all of the archaeological reports appear adequate with regard to surveys and impact analysis.

O5-3 The County acknowledges the request for the San Diego Archeological Society to be included in public review for any future environmental documents associated with the Proposed Project and will accommodate this request. The County would like to clarify, however, that the Tierra del Sol and Rugged solar farms were analyzed at a project level in the DPEIR; therefore, specific mitigation measures are proposed for these solar farms and would be implemented as presented in the Final Program Environmental Impact Report (FPEIR). The LanWest and LanEast solar farms were analyzed at a programmatic level. Some mitigation measures for direct and indirect impacts were identified for these...
solar farms. However, these solar farms will require future discretionary review through the Major Use Permit process. Table S-2 of the DPEIR provides a summary of significant effects associated with the Proposed Project and includes proposed mitigation measures to reduce the significant effects.

The County disagrees with this comment. The mitigation measure M-CR-PP-1 in the DPEIR provides for curation of artifacts, which includes curating at the San Diego Archaeological Center or at a culturally affiliated Tribal Curation Facility, or, alternatively, returning prehistoric materials to a culturally affiliated tribe. The mitigation measure, as stated in the technical reports and the DPEIR, uses the term “repatriation” to mean “returned.” The use of the term “repatriate” in this sense is not the same as that used under the Native American Graves Protection and Repatriation Act.

The Register of Professional Archaeologists (RPA) does provide standards which research archaeologists should follow. RPA certification is not a requirement for archaeologists who are on the County’s CEQA Consultant List. Listed archaeological consultants are the professionals who prepare technical studies. As such, they provide an evaluation of resources and the study is revised with input from County staff. The County’s Guidelines for Determining Significance and
| O5-5 | Report Format and Content Guidelines – Cultural Resources (Guidelines) do include guidance regarding curation. The Guidelines are a guidance document and are not the absolute authority on how a project should be conditioned. Mitigation outside of those identified in the Guidelines may be applied to projects and are typically based on consultations with the Native American community and comments received during public review. This comment addresses the same issue as comment O5-4, but indicates the issue is also present in the DPEIR. The County’s response to comment O5-4 applies to this comment as well. |