

3.5 CULTURAL RESOURCES

Cultural resources, such as archaeological, historic and ethnographic resources, are relevant to modern life as they contain information that can provide insight into the community's history as well as contribute to broader knowledge of the past. Because cultural resources provide this information, they have been recognized by governments and citizens as resources to be examined and protected.

This section identifies and evaluates the potential impacts to cultural resources associated with the implementation of the San Marcos General Plan. The summary of existing conditions includes a brief historic overview to provide a context for understanding the types of cultural resources found within the planning area as well as describes known cultural resources, including archaeological, historical and ethnographic sites within the planning area. The resources discussed herein are considered as they are within the context of Section V, Cultural Resources, in Appendix G of the State CEQA Guidelines (Environmental Checklist Form). Potential environmental impacts associated with implementation of the proposed General Plan, and appropriate mitigation measures where applicable, are described.

3.5.1 EXISTING ENVIRONMENTAL SETTING

Historical and Archeological Overview

Prior to Spanish colonization, the area of present-day San Marcos was inhabited by Takic-speaking native groups, who were linguistically related to inhabitants of the Los Angeles Basin. The Luiseño, also known as the Juaneño, inhabited territory along the coast from Agua Hedionda to approximately Aliso Creek which extended inland to Palomar Mountain (Kroeber 1925; Oxendine 1983; Shipek 1977). The Luiseño moved seasonally between mountain and seashore camps to hunt, collect shellfish, and harvest plant items such as acorns and hard seeds (Moratto 1984).

While a colony of Spain since 1542, Alta California's first colonies were established more than 200 years after that date. After the Spanish settlement of San Diego, in 1769, the Spanish expedition continued north through the San Luis Rey Valley (Pourade 1960). The valley would remain a stop on El Camino Real (the King's Highway) until the 1798 founding of Mission San Luis Rey de Francia (Pourade 1960). According to lore, the area was named Los Vallecitos de San Marcos in 1797 after the feast day of St. Mark, which was the day Spanish soldiers encountered the fertile valley while pursuing livestock thieves (City of San Marcos 2009).

When California became a Mexican territory in 1782, it was divided into several large ranchos including Rancho Los Vallecitos de San Marcos, which was granted to Jose Maria Alvarado on April 22, 1840 (Pourade 1961). When Alvarado was killed in 1846, his heirs sold the rancho to Lorenzo Soto. During this period, development amounted to cattle grazing and rudimentary trails. After the Mexican American War when California's was ceded to the United States, Soto sold part of the San Marcos Rancho to Cave Couts, an entrepreneur and rancher. In 1872, Major Gustavus French Merriam, a homesteader from Topeka, Kansas, made the first permanent settlement on a 160-acre parcel in north Twin Oaks Valley (Carroll 1975; City of San Marcos 2009). Other settlers arrived in the valley in the early 1880s, and as in

other San Diego County settlements, former rancho lands developed after railroads connected the area to regional and national rail networks. The California land boom in the 1880s brought thousands of new settlers and led to the establishment of communities in this region.

In 1883, John H. Barham founded the area's first town, Barham, south of Merriman's settlement in Twin Oaks Valley. By 1884, Barham had a school, post office, blacksmith, feed store, weekly newspaper, and regular freight wagon and stagecoach. Barham was situated on the main road from the coast to Escondido, and 7 miles west of the California Southern Railroad line between San Diego and Los Angeles (Carroll 1975). Other small hamlets developed until land speculation transformed the valley in the late 1880s.

By 1887, the Coutts family sold most rancho lands to the San Marcos Land Company, which divided it into lots in a planned community named San Marcos (Carroll 1975). To promote the community, the company negotiated with the California Central (Santa Fe) Railroad to build a depot in San Marcos and provide daily passenger, freight, and mail service (Carroll 1975). As the railroad surpassed stagecoaches in importance, San Marcos prospered while other developments without rail access, like Glen Barham, failed. San Marcos grew enough to merit four daily trains by 1888, and smaller communities like Barham lost population and investment to San Marcos (Carroll 1975). By 1889, San Marcos was a regional center with a new post office and school district with the original town was located at what is now the intersection of Grand Avenue and Rancho Santa Fe Road. By 1896, San Marcos was an established community, although little evidence of permanent structures at the turn of the century exists (USGS 1901). In 1903, the town's center shifted closer to the railroad tracks at present day Mission Road and Pico Avenue (City of San Marcos 2009). In 1907, San Marcos had regular mail delivery, telephone service, a general store, and several schools. Agriculture was the dominant industry into the 20th century.

By the late 1940s, more agricultural fields and structures existed (USGS 1948), and the valley was on the cusp of a boom induced by the construction of State Route 78 (SR 78) and the diversion of water from the Colorado River to the region in the 1950s. Improved transportation links and water supply resulted in population and economic growth. Dairy and poultry industries developed and a significant population increase to 2,500 residents led to the incorporation of the City of San Marcos on January 28, 1963 (City of San Marcos 2009). In the 1970s, San Marcos was the third fastest-growing city in the state, which resulted in a population of 17,479 in 1980, 33,800 in 1990, and 82,743 in 2000 (City of San Marcos 2009). Today, the City of San Marcos contains residential, commercial, light industrial, and educational activities.

Archeological, Historic, and Ethnographic Resources

The records search performed in 2009 identified 149 previously documented cultural resources within the planning area. The majority of the area of concern was previously surveyed for cultural resources, with several prehistoric and historic results. Table 3.5-1 summarizes these resources and each resource is discussed in the paragraphs below.

**Table 3.5-1
Summary of Historical and Archeological Resources in San Marcos**

Resource	Sites
Archaeological	
Prehistoric Isolated Finds	4
Prehistoric archaeological sites	103
Historic archaeological sites	13
Multi-component (prehistoric and historic) archaeological sites	4
Historic	
Historic architectural sites	25
Ethnographic	
Ethnographic sites	0
Total	149

Source: AECOM 2009

Archaeological Resource Sites

Prehistoric Isolated Finds

Four isolated prehistoric finds were previously documented in the planning area. These four finds include one site with angular waste, two sites with manos, and one site with a stone tool.

Prehistoric Archaeological Sites

Of the 149 previously documented cultural resources in the planning area, 103 are prehistoric archaeological sites. Forty-nine of these 103 are lithic scatters; three of these also contain other artifacts including shell, a milling slick and pottery, and a groundstone scatter, and one of which was destroyed subsequent to its initial recordation. Thirty-three of the 103 prehistoric archaeological sites are bedrock milling sites; one of these also contains a lithic scatter while three of these bedrock milling sites were destroyed subsequent to their initial recordation. Finally, 15 of the 103 prehistoric archaeological sites are habitation sites; five of these are prehistoric lithic quarries and one contains prehistoric rock shelters.

Multi-Component Archaeological Sites

Four multi-component archaeological sites containing both prehistoric and historic artifacts have been previously documented in the planning area. These sites consist of one site with a lithic scatter and a historic refuse scatter, one site with a prehistoric habitation site and a historic refuse scatter, and two bedrock milling sites with historic refuse scatters.

Historic Archaeological Sites

There are 13 previously documented historic archaeological sites in the planning area. These sites include three historic foundations, two chicken coop foundations, two homestead sites, two historic refuse

scatters, one historic mining site, one historic rock alignment, one historic rock cairn, and one site containing historic water storage reservoirs.

Historic Resource Sites

Historic Architectural Sites

The remaining 25 of the 149 previously recorded cultural resources are historic architectural resources, detailed below in Table 3.5-2. These resources represent a variety of structures from the late 18th century to the mid-20th century and are mainly of vernacular architectural style. These resources include six residential complexes (with an additional five outbuildings: a privy, two cabins, a shed, and a barn), eight residences (one of which was destroyed by fire subsequent to its initial recordation), a Quonset-type industrial building, a commercial building, an adobe house, a cement silo, a farmhouse, and a historic cemetery. One grouping of buildings was recorded as the Merriam House and outbuildings, dating from the 1890s and associated with Florence Augusta Merriam, an important naturalist. The Merriam House and its outbuildings may be associated with one of the founding families of San Marcos, and were evaluated as potentially eligible for the California Register of Historic Resources (CRHR).

**Table 3.5-2
Historic Resources in and Adjacent to the San Marcos Planning Area**

Jurisdiction	Address
County of San Diego	555 Deer Springs Road*
	110 Bennett Court
	236 Pico Avenue
	1300 Barham Drive
	1407 Barham Drive
San Marcos	1412 Barham Drive
	1414 Barham Drive
	0 S Rancho Santa Fe Road
	341 Richmar Avenue
	358 Fitzpatrick Road
	918 Discovery Street
	144 Smilax Road
	113 Smilax Road
	121 Smilax Road
135 Smilax Road	
Vista	139 Smilax Road
	2709 S Santa Fe Avenue
	2732 S Santa Fe Avenue
	2732 S Santa Fe Avenue

*Location contains several historic structures.

In addition to these previously recorded historic architectural resources, the records search listed 10 historic addresses of resources that have been identified but not formally recorded.

Undiscovered and Future Historic Resources

The summary of the previously recorded resources reveals a quantity of prehistoric sites and sensitive areas for potential undiscovered archaeological resources. Although there are fewer recorded historic architectural resources, the documented history of early settlement in the San Marcos Valley suggests that there may be several resources associated with that development that may be potentially eligible for the CRHR or the National Register of Historic Places (NRHP) as many buildings that were built during the early years of the city will soon be eligible for consideration as historic resources.

Ethnographic Resources

On September 29, 2009, a request was sent to the Native American Heritage Commission (NAHC) for a search of the Sacred Lands Inventory for information on cultural resources related to Native American occupation of the study area. On October 20, 2009, the NAHC responded that there were known sites within 0.5-mile of the study area and that these required consultation with interested Native American parties. Only one identified interested party chose to consult with the City, and no ethnographic issues were presented in consultation.

3.5.2 REGULATORY SETTING

The following section provides a general description of the applicable regulatory requirements for the planning area, including federal, state, regional, and local guidelines.

Federal Regulations

National Historic Preservation Act

Enacted in 1966, the National Historic Preservation Act (NHPA) established the National Register of Historic Places (NRHP) program under the Secretary of the Interior. The NHPA authorized funding for state programs with provisions for pass-through funding and participation by local governments, created the Advisory Council on Historic Preservation, and established the Section 106 review process for protecting historic resources. The goal of the Section 106 review process is to offer a measure of protection to sites that are determined eligible for listing in the NRHP. As part of this process, the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Preserving Historic Buildings (Secretary's Standards) were developed to provide guidance to federal agencies in reviewing potential impacts to historic resources. The NHPA provides the legal framework for most state and local preservation laws.

State Regulations

California Points of Historical Interest

California Points of Historical Interest are buildings, structures, sites, or features of local (city and county) significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value. Points of Historical Interest designated after December

1997 and recommended by the State Historical Resources Commission are also listed in the CRHR. The criteria for designation of Points of Historical Interest are the same as those that govern the CHL program.

Public Resources Code 5097.5

Section 5097.5 of the California PRC prohibits excavation or removal of any “vertebrate paleontological site or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands.” Section 30244 requires reasonable mitigation of adverse impacts to paleontological resources from development on public land. Penal Code Section 623 spells out regulations for the protection of caves, including their natural, cultural, and paleontological contents. It specifies that no “material” (including all or any part of any paleontological item) will be removed from any natural geologically formed cavity or cave.

Health and Safety Code 7050.5

This code establishes that any person who knowingly mutilates, disinters, wantonly disturbs, or willfully removes any human remains in or from any location without authority of the law is guilty of a misdemeanor. It further defines procedures for the discovery and treatment of Native American remains.

Health and Safety Code 8010-8011

This code is intended to provide consistent state policy to ensure that all California Indian human remains and cultural materials are treated with dignity and respect. The code extends policy coverage to nonfederally recognized tribes and federally recognized groups.

AB 2641

This section provides procedures for private land owners to follow upon discovering Native American human remains. Land owners are encouraged to consider culturally appropriate measures if they discover Native American human remains as set forth in California PRC 5097.98. Assembly Bill (AB) 2641 further clarifies how the land owner should protect the site both immediately after discovery and into the future.

Senate Bill 18

Because the proposed Project would result in an update to the San Marcos General Plan, the Project is required to comply with Senate Bill (SB) 18 (Government Code Sections 65352.3, 65352.4), which requires that, prior to the adoption or amendment of a General Plan proposed on or after March 1, 2005, a city or county must consult with Native American tribes with respect to the possible preservation of, or the mitigation of impacts to, specified Native American places, features, and objects located within that jurisdiction.

Local Plans and Policies

No local plans or policies are applicable to cultural resource management or preservation.

3.5.3 THRESHOLDS FOR DETERMINING SIGNIFICANCE

The impact of the proposed project related to cultural resources would be considered significant if it would exceed the following thresholds of significance, in accordance with Appendix G of the *CEQA Guidelines*:

- Cause a substantial adverse change in the significance of an archaeological resource.
- Disturb any human remains, including those interred outside of formal cemeteries.
- Cause a substantial adverse change in the significance of a historical resource.

3.5.4 ANALYSIS OF ENVIRONMENTAL IMPACTS

A cultural records search was conducted at the South Coastal Information Center at San Diego State University on September 26, 2009, and a historical records search was conducted at the same location on October 2, 2009. The records search included a review of all recorded historical and archaeological sites within the planning area, as well as a review of cultural resource reports on file. Additional listings were reviewed for the planning area, including the California Points of Historical Interest, the California Historical Landmarks, the California Register of Historical Resources (CRHR), the National Register of Historic Places (NRHP), and the California State Historic Resources Inventory. Historic maps were also reviewed (Historic Roads and Trails 1769-1885, San Diego County 1872, San Marcos, Valley Center, and Rancho Santa Fe 1948 7.5' USGS, Escondido 1901 15' USGS, and San Luis Rey 1901 30' USGS).

Cause substantial adverse change in the significance of an archaeological resource, including ethnographic resources

As discussed above in 3.5.1 under the Archaeological Sites subheading, cultural resource studies completed within the planning area resulted in the identification and documentation of 124 prehistoric and historical archaeological sites. Specifically, within the San Marcos Planning Area, four prehistoric isolated finds, 103 prehistoric sites, 13 historical archeological sites, and 4 sites containing both prehistoric and historical archaeological remains have been documented. Based on the existence of these sites, other archaeological sites are likely to be found within the planning area.

Individual development projects would involve grading, excavation, or other ground-disturbing activities, which could disturb or damage as-yet-undiscovered archaeological resources or human remains. Hence, it is possible that the future land uses described within the proposed General Plan could result in development of land with as-yet unknown archaeological resources. However, of the areas identified for growth under the proposed General Plan, only three neighborhoods—the College Area, Twin Oaks Valley and Questhaven/La Costa Meadows neighborhoods—would require the extension of or installation of new infrastructure facilities such as roads and utilities. In the areas identified for growth under the

proposed General Plan in the City of San Marcos, infrastructure facilities already exist, which will reduce the need for some excavation and other ground-disturbing activities.

The proposed General Plan contains policies and programs aimed at reducing the impacts to these archeological resources including requiring the City to work with state and federal agencies to apply and enforce laws, regulations, and codes related to archaeological resources to ensure the adequate protection of these resources; directing the City to consult with the appropriate organizations and individuals (e.g., Information Centers of the California Historical Resources Information System (CHRIS), the Native American Heritage Commission (NAHC), and Native American groups and individuals) to minimize potential impacts to cultural resources. Although these policies illustrate the City's intent to maintain its archaeological resources, they do not require or prevent specific actions related to conservation of these resources, and therefore it is possible that new development associated with the proposed General Plan may result in a **significant impact** to the City's archaeological resources, and as a result, mitigation of impacts is required.

Despite the existence of archaeological sites, no ethnographic resources were identified in the planning area, and so will not be disturbed by the implementation of the proposed project. Because no ethnographic resources were identified in the planning area, **less than significant impacts** on such resources will occur as a result of the proposed General Plan. Given less than significant impacts, no mitigation measures are required.

Disturb human remains

Human remains, particularly those interred outside formal cemeteries, could be disturbed by individual development projects would involve grading, excavation, or other ground-disturbing activities. Although it is possible that the future land uses described within the proposed General Plan could result in development of land with as-yet unknown human remains, only 3 of the 47 Focus Areas identified for growth under the proposed General Plan—the College Area, Twin Oaks Valley and Questhaven/La Costa Meadows neighborhoods—would require the extension of or installation of new infrastructure facilities such as roads and utilities. In the 44 other Focus Areas identified for growth under the proposed General Plan in the City of San Marcos, infrastructure facilities already exist, which will reduce the need for excavation and other ground-disturbing activities.

Native American human remains have specific provisions for treatment in PRC Section 5097.98, as amended by Assembly Bill 2641, which address the disposition of Native American burials, protects such remains, and establishes the NAHC to resolve any related disputes. Additionally, disturbing human remains would destroy the resources and could potentially violate the health code. HSC Section 7050.5 has specific provisions for the protection of human burial remains if they are discovered, Native American or otherwise. HSC Section 7050.5 requires that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there would be no further excavation or disturbance of the site, or any nearby area reasonably suspected to overlay adjacent remains, until the County Coroner has examined the remains.

New development and redevelopment projects that result from the implementation of the proposed project would be required to adhere to the laws and regulations discussed above and listed in Section 3.5.2. Therefore, impacts associated with the disturbance of human remains would be **less than significant** because existing laws and regulations would reduce the potential for encountering human remains and ensure the appropriate disposition of any human remains that are encountered.

Cause substantial adverse change in the significance of a historical resource

There are currently 25 historic resources known to exist within the San Marcos planning area, and additional historic resources may also be present at other locations in the planning area. Although the implementation of the proposed General Plan would not direct destruction of, or damage to, historical resources, future land uses and infill development permitted under the General Plan could result in changes that affect historic structures or the historic character of neighborhoods or districts. Actions that could directly affect historical structures include demolition, seismic retrofitting, and accidents or vibration caused by nearby construction even though General Plan goals, plans, and policies create a rubric for the conservation of historical resources.

While future development associated with the implementation of the proposed General Plan may result in actions that could affect historic structures, the proposed General Plan contains specific policy and program requirements aimed at protecting historic resources including prohibiting the demolition or removal of a historic structure without evaluation of the structure's condition, the cost of rehabilitation, and feasible alternatives; requiring the City to work with state, and federal agencies to apply and enforce historic preservation laws, regulations, and codes to ensure the adequate protection of applicable resources; and directing projects, where feasible, relocating historic structures to the historic Heritage Park section of Walnut Grove Park. Even with adherence to these policies and programs, **significant impacts** to historic resources are still expected as a result of the new development associated with the proposed General Plan. As a result, mitigation measures are required.

3.5.5 MITIGATION MEASURES

Implementation of the San Marcos General Plan would result in significant impacts related to cultural resources. The following mitigation measures are general and programmatic in nature, and would be refined in project-specific CEQA documents.

Archeological Resources

Implementation of the San Marcos General Plan would result in significant impacts related to archeological resources. Implementation of Mitigation Measures CR-1, CR-2, CR-3, CR-4, CR-5, and CR-6 would reduce impacts related to archeological resources.

CR-1 During CEQA review of potential new development projects, the City shall require any potential new development project involving grading, ground-disturbing, and other major earth-moving activities to conduct a review of literature and historic maps and a records

search to determine whether the project area has been previously surveyed and whether cultural resources were identified. In the event that the records indicate that no previous survey has been conducted, the project implementer shall have a qualified cultural resource specialist conduct a survey of the project area. Specifically, the report shall explicitly state the results of the literature study and site survey. In addition, the City shall consult the Native American Heritage Commission and any and all area tribes that have filed a claim in the Sacred Lands Inventory to identify potential places of cultural and/or religious importance or sites that may contain other cultural resources. Resources that cannot be avoided will need to be evaluated, and if found significant, will require project-level mitigation prior to project approval.

- CR-2 During the planning, design, and environmental review phases of individual development projects the City shall require the project implementer to incorporate design measures in engineering documents to provide avoidance or minimization of impacts to significant archaeological or cultural resources. Archaeological or cultural resource sites identified as significant shall be avoided or mitigated by completion of a data recovery program conducted in compliance with CEQA and agency guidelines.

Site avoidance and preservation can include capping the site with gravel or construction fabric and 16 to 18 inches of sterile fill soil. Sites proposed for capping shall be indexed so future researchers have reasonable knowledge of the resources that have been protected. Capped sites can be landscaped with native, shallow rooted plants that are compatible with the surrounding biologic habitat. Suggested capping methods should be communicated to interested Tribes for their review and Tribal recommendations shall be considered to the maximum extent feasible as capping plans are finalized. Passive uses for capped sites include trails, picnic areas, and play areas. Capped areas should not contain asphalt or landscaping with invasive root systems.

- CR-3 During construction of specific development projects, the City shall require monitoring of grading, ground-disturbing, and other major earth-moving activities in previously undisturbed areas or in areas with known archaeological resources projects by a qualified archeologist and Tribal monitor during activities in areas with cultural resources of interest to local Native American Tribes. Both the archaeologist and tribal monitor shall observe grading, ground-disturbing, and other major earth-moving activities.

- CR-4 The City shall require a qualified archaeologist to evaluate any cultural resources discovered during site construction activities, and the Tribal monitor will accompany a qualified archeologist to identify, and determine the significance of, cultural resources and/or sacred lands.

Should an archaeological deposit and/or feature be encountered during construction activities, an Archaeological Data Recovery Program shall be prepared and implemented with consultation with interested Native American Tribes. Both the archeologist and Tribal monitor should strive for agreement on the determined significance of an artifact or cultural

resource. Once in agreement, either the archeologist or Tribal monitor may divert or halt ground-disturbing activities for the purposes of implementing a data recovery program. A data recovery program for archaeological sites consists of excavation of a percentage of the site, determined in consultation with the project implementer, to provide information necessary to answer significant research questions.

All Native American human remains and associated grave goods discovered shall be returned to their Most Likely Descendent and repatriated. The final disposition of artifacts not directly associated with Native American graves will be negotiated during consultation with interested Tribes. Artifacts include material recovered from all phases of work, including the initial survey, testing, indexing, data recovery, and monitoring.

The qualified archaeologist will apply mitigation measures prior to resuming construction work. Local Native American Tribes shall be consulted in the identification of mitigation measures to address impacts consistent with California requirements, including provisions to address inadvertent discoveries.

CR-5 The City shall work with state, and federal agencies to apply and enforce historic preservation laws, including the adopted Mills Act, regulations, and codes including the California Historical Building Code and other state laws resources to ensure the adequate protection of resources when analyzing a proposed project (Implementation Program COS-8.1).

CR-6 The City shall require consultation for itself and project implementers with the appropriate organizations and individuals (e.g., Information Centers of the California Historical Resources Information System (CHRIS), the Native American Heritage Commission (NAHC), and Native American groups and individuals) to minimize potential impacts to historic and cultural resources that may occur at the result of a proposed project (Implementation Program COS-8.2).

Historical Resources

Implementation of the San Marcos General Plan would result in significant impacts related to historical resources. Implementation of Mitigation Measures CR-1, CR-2, CR-5 and CR-6 (listed above) and Mitigation Measures CR-7 and CR-8 would reduce impacts related to historical resources.

CR-7 Where feasible, the City shall require the relocation of historic structures to the historic Heritage Park section of Walnut Grove Park to protect them from impacts resulting from a proposed project (Implementation Program COS-8.3).

CR-8 Prior to construction of specific development projects that would disturb a historic structure listed or eligible to be listed in the NRHP, the CRHR, or the San Diego County Local Register of Historical Resources, the City shall require the development of feasible project-level mitigation measures, identified in consultation with the State Historic Preservation Office when appropriate, to avoid or substantially reduce impacts to significant cultural

resources. Feasible project-level mitigation measures include maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation, relocation, or reconstruction of any impacted historic resource, which will be conducted in a manner consistent with the Secretary of the Interior's Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings.

3.5.6 SIGNIFICANCE AFTER MITIGATION

Archeological Resources

Mitigation Measures CR-1, CR-2, CR-3, CR-4, CR-5, and CR-6 are proposed to address the impacts on archeological resources. Mitigation Measure CR-1 states that the City shall require any potential new development project to determine whether cultural resources are present and require mitigation if found significant; Mitigation Measure CR-2 requires the incorporation of design measures in engineering documents to avoid or minimize impacts to significant archeological resources. Mitigation Measure CR-3 states that the City shall require monitoring of grading, ground-disturbing and other major earth-moving activities in previously undistributed areas and areas known to contain archeological resources by an archaeologist and Tribal monitor. Mitigation Measure CR-4 states that the City shall require an archaeologist and Tribal monitor to will evaluate any resources discovered, halt or divert construction activities, implement a data recovery program, and return any resources to the Most Likely Descendant as well as requires the archaeologist to apply mitigation measures in consultation with Local Native American Tribes. Mitigation Measure CR-5 states that the City shall work with state, and federal agencies to apply and enforce historic preservation laws to ensure the adequate protection of resources. Mitigation Measure CR-6, an Implementation Program from the Conservation and Open Space Element, requires the City and project implementers to consult with appropriate organizations and individuals to minimize potential impacts to archeological resources.

Implementation of Mitigation Measures CR-1, CR-2, CR-3, CR-4, CR-5, CR-6 and CR-7 would reduce impacts associated with archeological resources and result **less than significant** impacts at the program level.

Historical Resources

Mitigation Measures CR-1, CR-2, CR-5, CR-6, CR-7, and CR-8 are proposed to address the impact on historical resources. Mitigation Measure CR-1 and CR-2 are discussed above. Mitigation Measure CR-5 states that the City shall work with state, and federal agencies to apply and enforce historic preservation laws to ensure the adequate protection of resources. Mitigation Measure CR-6 requires the City and project implementers to consult with appropriate organizations and individuals to minimize potential impacts to historic resources. Mitigation Measure CR-7 states that the City shall require the relocation of historic structures to the historic Heritage Park section of Walnut Grove Park to protect them from impacts resulting from a proposed project. Mitigation Measure CR-8 states that the City shall require the development of feasible project-level mitigation measures to avoid or substantially reduce impacts to significant cultural resources from proposed projects. The implementation of Mitigation Measures CR-1,

CR-2, CR-5, CR-6, CR-7, and CR-8 would reduce the impact of new development associated with the proposed General Plan to a level **less than significant**.

The implementation of Mitigation Measures CR-1, CR-2, CR-6, CR-7, and CR-8 would reduce the impact of new development associated with the proposed General Plan to a level **less than significant**.

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