

**TABLE OF CONTENTS**

**4.5 CULTURAL RESOURCES.....4.5-1**

4.5.1 Introduction .....4.5-1

4.5.2 Regulatory Setting .....4.5-1

4.5.3 Existing Conditions .....4.5-4

4.5.4 Applicant Proposed Measures .....4.5-6

4.5.5 Potential Impacts .....4.5-8

4.5.6 References .....4.5-11

**LIST OF APPENDICES**

4.5-A Cultural Resources Reports (**Confidential**)

THIS PAGE IS INTENDED TO BE LEFT BLANK

**4.5 CULTURAL RESOURCES**

Would the project:		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a.	Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e.	Cause a substantial change to Tribal Cultural Resources as defined in Public Resources Code Section 5097.94?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**4.5.1 Introduction**

This section of the PEA describes the existing conditions and potential project-related impacts to cultural resources in the vicinity of the Proposed Project. The analysis concludes that less than significant impacts to cultural resources will occur. The Proposed Project’s potential effects on this resource were evaluated using the significance criteria set forth in Appendix G of the CEQA Guidelines. The conclusions are summarized in the checklist above, and discussed in more detail in Section 4.5.6.

**4.5.2 Regulatory Setting**

**4.5.2.1 Federal**

**MCB Camp Pendleton**

*MCB Camp Pendleton Base Order 500.2K Ch1, Base Regulations*

The MCB Camp Pendleton Base Regulations (MCB Camp Pendleton 2010) provides detailed requirements and procedures governing the administration of MCB Camp Pendleton. This document defines organization and command relationships, provides administrative instructions, and describes the function of various departments at MCB Camp Pendleton, including Marine Corps Community Services, Operations and Training, Office of the Staff Judge Advocate, and others. As described in Chapter 9, Natural Resources/Cultural Resources, it is the continuing policy of the Commanding Officer of MCB Camp Pendleton to establish and carry out policy regarding the evaluation, management, and protection of cultural resources on MCB Camp Pendleton.

## Other Federal Regulations

### *National Historic Preservation Act (NHPA)*

The primary framework for historic preservation in the U.S is outlined in the NHPA, as amended, at 54 USC Sections 300101-305306. The NHPA authorizes the Secretary of the Interior to expand and maintain a National Register of Historic Places (NRHP), establishes an Advisory Council on Historic Preservation as an independent federal entity, requires federal agencies to take into account the effects of their undertakings on historic properties, affords the Advisory Council on Historic Preservation a reasonable opportunity to comment on any undertaking that may affect historic properties listed, or eligible for listing, in the NRHP, and makes the heads of all federal agencies responsible for the preservation of historic properties owned or controlled by their agencies.

Historic properties are defined as prehistoric and historic sites, buildings, structures, districts, or objects listed or eligible for listing on the NRHP, as well as artifacts, records, and remains related to such properties. Compliance with Section 106 of the NHPA, which directs federal agencies to take into account the effect of a federal undertaking on a historic property, is outlined in the Advisory Council on Historic Preservation's regulations, Protection of Historic Properties listed as 36 Code of Federal Regulations (CFR) Part 800. A traditional cultural property can be defined generally as one that is eligible for inclusion in the NRHP because of its association with cultural practices or beliefs of a living community that are rooted in that community's history and are important in maintaining the continuing cultural identity of the community.

Cultural resources are generally divided into three categories: archaeological resources, architectural resources, and traditional cultural resources:

- **Archaeological resources** – Places where people changed the ground surface or left artifacts or other physical remains (e.g., arrowheads or bottles).
- **Architectural resources** – Standing buildings, dams, canals, bridges, and other structures.
- **Traditional cultural resources** – These include traditional cultural properties, which are associated with the cultural practices and beliefs of a living community that link that community to its past and help maintain its cultural identity. Traditional cultural resources may also include archaeological resources, locations of historic events, sacred areas, sources of raw materials for making tools, sacred objects, or traditional hunting and gathering areas.

The NHPA mandates guidelines for the protection of historic properties in Sections 106 and 110 of the law. Section 106 of the NHPA requires federal agencies to analyze the effect of an undertaking on cultural resources included in or eligible to the NRHP. Compliance with Section 106 of the NHPA, is outlined in the Advisory Council of Historic Preservation's regulation, Protection of Historic Properties.

The NHPA (54 USC Section 302701) also includes guidance for Native American consultation regarding cultural significance of potential religious and sacred artifacts. In addition, coordination with federally recognized Native American tribes must occur in accordance with Executive Order 13175, Consultation and Coordination with Indian Tribal Governments. Section 110 requires federal agencies to establish programs to locate, evaluate, and nominate all properties that qualify for inclusion in the NRHP.

### *Native American Graves Protection and Repatriation Act (NAGPRA)*

The NAGPRA, listed as Public Law 101-601 and 25 USC Sections 3001-3013 lays out the process for determining the modern Native American groups associated with human remains and the sacred or

funerary objects with which they are associated, and repatriating these materials. NAGPRA requires consultation with the associated modern Native American groups prior to intentional excavation or after an inadvertent discovery of these materials. This legislation applies to these types of materials found on federal lands or by an agency conducting a project which has received federal funding.

#### *Paleontological Resource Preservation Act*

The Paleontological Resources Preservation Act, listed as 16 USC Section 470aaa requires the Secretaries of the Interior and Agriculture to manage and protect paleontological resources on federal land using scientific principles and expertise. As directed by the Act, federal agencies will begin developing regulations, establishing public awareness and education programs, and inventorying and monitoring federal lands.

#### **4.5.2.2 State**

##### **California Assembly Bill (AB) 52**

AB 52 amends CEQA by creating a new category of cultural resources, tribal cultural resources, and new requirements for consultation with Native American Tribes. Governor Brown signed AB 52 on September 25, 2014, and the bill became effective July 1, 2015. Lead agencies are required to offer Native American tribes with an interest in tribal cultural resources located within its jurisdiction the opportunity to consult on CEQA documents. The new procedures under AB 52 offer the tribes an opportunity to take an active role in the CEQA process in order to protect tribal cultural resources. If the tribe requests consultation within 30 days upon receipt of the notice, the lead agency must consult the tribe. Guidelines for AB 52 are currently in progress by multiple agencies to help implement this new requirement.

##### **California Government Code (CGC)**

CGC Sections 25373 and 37361, authorizes county and city governments to enact zoning ordinances for the protection and regulation of buildings and structures of special historical value. Section 65860 of the CGC enlarges the scope of those zoning powers to allow those agencies to regulate the use of buildings, structures, and land between business, industry, residential, and open space.

##### **California Senate Bill 18**

Senate Bill 18 provides additional guidance regarding California Native American traditional tribal cultural places. Local governments are required by this bill to build in tribal consultation and notice requirements when amending general or specific plans. These requirements stipulate that:

- The appropriate California Native American tribe be given the right to conduct consultation for preservation or mitigation of cultural places.
- Notice of the proposed action must be given to tribes on the Native American Heritage Commission (NAHC) contact list who have traditional lands in the Proposed Project area.
- Notice of public hearings must be given to tribal groups that have requested consultation at least ten days prior to the hearing.

##### **California Penal Code**

California Penal Code 14 Part 1, Section 622.5 states that “Every person, not the owner thereof, who willfully injures, disfigures, defaces, or destroys any object or thing of archeological or historical interest or value, whether situated on private lands or within any public park or place, is guilty of a misdemeanor.”

### **California Native American Graves Protection and Repatriation Act (Cal NAGPRA)**

Cal NAGPRA is contained in the California Health and Safety Code Sections 8010-8021, and 8025-8030. Cal NAGPRA provides for the repatriation of human remains and cultural items in the possession or control of a state or local agency or museum to the rightful California Native American tribe. This law defines the term California Native American tribe to include non-federally recognized groups.

### **California Health and Safety Code**

California Health and Safety Code, Section 7050.5 (states that if human remains are discovered during construction, the project owner is required to contact the county coroner. If a county coroner determines that remains found during excavation or disturbance of land are Native American, the coroner must contact the NAHC within 48 hours.

#### **4.5.2.3 Local**

As provided in CPUC General Order 131-D, the CPUC preempts local discretionary authority over the location and construction of electrical utility facilities. The following discussion of relevant local land use plans and policies that pertain to cultural resources is provided below for informational purposes.

#### **City of San Clemente**

The City of San Clemente Centennial General Plan (City of San Clemente 2014) is the comprehensive planning document for the City of San Clemente. The General Plan establishes policies to manage new development, foster economic vitality, conserve natural resources, and to generally guide the City's growth in accordance with an established vision. The General Plan provides the framework by which the City of San Clemente would change and grow, identifying how physical and economic resources are to be managed and used into the future.

Goal 7 in the Land Use Plan of the Centennial General Plan Land Use Element is to “protect and preserve significant historic resources.” In their summary of the Centennial General Plan, the City of San Clemente Planning Department website states that, “...the goal with regard to Cultural Resources is to promote the preservation and restoration of the sites, structures, and districts which have architectural, historical, archaeological, and/or cultural significance to the City of San Clemente” (City of San Clemente 2015). City of San Clemente preservation ordinances apply to historic resources and landmarks listed by the City (City of San Clemente 2007).

### **4.5.3 Existing Conditions**

#### **4.5.3.1 Existing Setting**

The following summary of the cultural context for the MCB Camp Pendleton Area is from the Final Camp Pendleton Basewide Utilities Infrastructure Environmental Impact Statement (Department of the Navy 2010) and the Joint Logistics Over the Shore Environmental Assessment (Department of the Navy 2015).

#### **Regional Prehistory**

The archaeological record reveals that inhabitants appeared by the beginning of the Holocene Period about 12,000 years ago on the Channel Islands. They lived primarily by fishing and collecting shellfish. These early inhabitants reflect that fully developed maritime economies were present but very distinct from the Clovis tradition represented in the interior of North America. Southern California lacks Pleistocene components although several sites have been dated older than 9,000 years ago. The San

Dieguito complex is represented at these early sites by the presence of worked scrapers, leaf-shaped, and stemmed projectile points. Sites dating to the La Jolla complex are also present based on the presence of flaked cobble tools, abundant groundstone, and flexed burials. The relationship between these two complexes is debatable; however, it is evident that human populations were established along the southern coast of California during the Holocene Period (Department of the Navy 2010).

The Archaic Period dates between 8,500 and 1,300 Before Present (B.P.) which encompassed both a coastal and inland focus. The coastal Archaic is represented by the shell middens associated with the La Jolla complex while the inland Archaic is represented by the Pauma complex (Department of the Navy 2015). Archaeological remains associated with the La Jolla complex include shellfish and fish remains, flaked cobble tools, basin metates, manos, discoidals, stone balls, and flexed burials (Department of the Navy 2010).

The Late Prehistoric Period dates between 1,300 and 200 B.P. It was during this period that small projectile points appeared which indicate the use of bow and arrow, common use of ceramics, and the replacement of inhumations with cremations. All of these characteristics are of the San Luis Rey complex which was defined by Meighan in 1954 (Department of the Navy 2015). The San Luis Rey complex is divided into two temporally periods, the San Luis Rey I (A.D. 1400-1750) and San Luis Rey II (A.D. 1750-1850). The differences between these two include the presence of ceramics, pictographs, steatite arrowshaft straighteners, glass, and metal in the San Luis Rey II Period (Department of the Navy 2010). Deposits containing significant amounts of *Donax gouldii* shell have been found along the coast of northern San Diego County. These deposits are now often assigned to the Late Prehistoric Period based on the well documented increase of this resource during this time. The San Luis Rey complex also marked the arrival of Takic speakers from regions located farther inland (Department of the Navy 2015).

It was also during the Late Prehistoric Period that land use and settlement patterns began to focus on inland settings at both interior and upland locations. This is evident with the reoccupation of the Luiseño village, Topomai, around A.D. 900 after being abandoned for several thousand years. Numerous upland sites were also reoccupied in the Case Springs area by A.D. 1200 (Department of the Navy 2010).

When the Spanish arrived in the area known as MCB Camp Pendleton, it was occupied by Takic-speaking Native Americans known as the Luiseño to the Spanish. The Luiseño territory covered approximately 1,500 square miles of both coastal and interior southern California. The Luiseño language is placed within the Cupan group of the Takic family of the Uto-Aztecan, also known as the Southern California Shoshonean. It was estimated in 1925 that there were approximately 5,000 pre-contact Luiseño. However, at the time of Spanish contact, there were approximately 50 Luiseño rancherias with an average population of 200 at each one (Department of the Navy 2015).

### **History of the MCB Camp Pendleton Area**

Europeans first entered the area that is now MCB Camp Pendleton in 1769, when the Portola expedition passed through on its journey north to Monterey. The expedition described native villages at Santa Margarita, Las Pulgas, and Cristianitos Canyon. The earliest permanent structures on MCB Camp Pendleton were described in an 1827 mission report and consist of a small adobe where the Santa Margarita Ranch House is located and a mission estancia at Las Flores (Department of the Navy 2015).

After Mexico gained its independence from Spain in 1821, much of the MCB Camp Pendleton area became part of Rancho San Onofre and Rancho Santa Margarita. These ranchos were acquired in 1841 by Pio and Andres Pico. In 1844, the Pico brothers acquired Las Flores, one of the few Indian pueblos established by the Mexican government. The Pico brothers then created the Rancho Santa Margarita y Las

Flores. Having acquired the rancho, the Picos established a thriving cattle ranch (Department of the Navy 2015).

By 1862, the Picos had begun to have financial difficulties. They sold part of the rancho to their brother-in-law, Juan Forster, as an attempt to avoid losing it to creditors. Forster died in 1882 after completing a number of improvements to the rancho. The rancho was eventually transferred to James C. Flood and Richard O'Neill. O'Neill owned the property until it was acquired by the U.S. Marine Corps in 1942 (Department of the Navy 2015).

Since its establishment in 1942, major development at MCB Camp Pendleton has supported its mission as an amphibious training facility. Major construction activities occurred during World War II (1942–1945), the Korean War (1950–1953), and the Vietnam era (1963–1975). Since the end of the Cold War (1976–1989) until just recently, development has largely focused on upgrades of World War II-era facilities (Department of the Navy 2015).

#### **4.5.4 Applicant Proposed Measures**

The Proposed Project will implement the following APMs to avoid or minimize impacts to cultural resources.

##### **APM CUL-01. Supplemental Surveys**

SDG&E will conduct supplemental cultural resources surveys to address the impacts, if any, associated with components that were subsequently added to the Proposed Project, but which lie outside of the survey area covered in the Cultural Resources Survey report (HDR 2015a; refer to Appendix 4.5-A).

##### **APM CUL-02. Stub Pole Structure in San Mateo Archaeological District (SMAD)**

SDG&E will conduct additional surveys and testing and evaluation to assess whether or not the proposed stub pole structure will affect buried cultural deposits in the SMAD. A qualified archaeologist and Native American monitor will monitor all overhead work within the SMAD to ensure no impact is made during the ingress and egress of large vehicles. All ground disturbance work within the SMAD will be monitored by a qualified archaeologist and Native American monitor. As necessary and as feasible, SDG&E will investigate and implement additional design adjustments to avoid and/or minimize impacts to this resource.

##### **APM CUL-03. Additional Avoidance and Minimization**

SDG&E will implement additional avoidance and minimization recommendations described in the Recommendations for Cultural Resources Protection and Avoidance for the TL 695 and TL 6971 Reconductor Project Report. This document describes avoidance and minimization recommendations at each Proposed Project component that may have an adverse effect on cultural resources. The recommendations include no access roadway improvements within specified cultural sites, use of a truck mounted guard structure at guard structure 3, periodic archaeological and Native American spot-checking of construction activities, and other recommendations.

##### **APM CUL-04. Cultural Resources Sensitivity Training**

Prior to construction or ground disturbing activities, all SDG&E, contractor, and subcontractor personnel will receive training regarding the appropriate work practices necessary to effectively implement standard operating procedures and APMs relating to cultural resources, including the potential for exposing subsurface cultural resources and paleontological resources. This training will include presentation of the



procedures to be followed upon the discovery or suspected discovery of archaeological materials, including Native American remains, as well as of paleontological resources. A qualified archaeologist will demarcate work areas prior to the start of construction so as to minimize impacts to Environmentally Sensitive Areas. Construction crews will be instructed to work within designated work areas.

#### **APM CUL-05. Archaeological Monitoring**

A qualified archaeologist and Native American monitor will attend preconstruction meetings, as needed, and a qualified archaeological and Native American monitor will monitor all activities in the vicinity of all known cultural resources within the Proposed Project area. The requirements for archaeological and Native American monitoring will be noted on the construction plans. The archaeologist's duties will include monitoring, evaluation of any finds, analysis of materials, and preparation of a monitoring results report conforming to Archaeological Resource Management Reports guidelines.

In the event that cultural resources are discovered, the archaeologist would have the authority to divert or temporarily halt ground disturbance to allow evaluation of potentially significant cultural resources. The archaeologist would contact SDG&E's Cultural Resource Specialist, the Environmental Project Manager, and MCB Camp Pendleton Archaeologist immediately at the time of discovery. The archaeologist, in consultation with SDG&E's Cultural Resource Specialist, and MCB Camp Pendleton Archaeologist shall determine the significance of the discovered resources. SDG&E's Cultural Resource Specialist the Environmental Project Manager, and MCB Camp Pendleton Archaeologist would have to concur with the evaluation procedures to be performed before construction activities would be allowed to resume. For significant cultural resources, preservation in place would be the preferred manner of mitigating impacts. For resources that could not be preserved in place, a Research Design and Data Recovery Program would be prepared and upon approval from MCBCP would be carried out to lessen impacts. A cultural resources curation plan would be developed and implemented if resources cannot be preserved in place, and are considered to be unique and important. All collected cultural remains would be cataloged, and permanently curated with an appropriate institution. All artifacts would be analyzed to identify function and chronology as they relate to the history of the area. Faunal material would be identified as to species.

#### **APM CUL-06. Unanticipated Discovery of Human Remains**

If human remains are encountered during construction, SDG&E will comply with California State law (Health and Safety Code Section 7050.5; PRC Sections 5097.94, 5097.98 and 5097.99). This law specifies that work will stop immediately in any areas where human remains or suspected human remains are encountered. The appropriate agency and SDG&E will be notified of any such discovery. SDG&E will contact the Office of the Medical Examiner. The Medical Examiner has two working days to examine the remains after being notified by SDG&E. Under some circumstances a determination may be made without direct input from the Medical Examiner (e.g., when the remains can be positively identified by the archaeologist as being non-human). When the remains are determined to be Native American, the Medical Examiner has 24 hours to notify the NAHC. The NAHC will immediately notify the identified most likely descendant (MLD) and the MLD has 24 hours to make recommendations to the landowner or representative for the respectful treatment or disposition of the remains and grave goods. If the MLD does not make recommendations within 24 hours, the area of the property must be secured from further disturbance. If there are disputes between the landowner and MLD, the NAHC will mediate the dispute to attempt to find a resolution. If mediation fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall re-enter the human remains and items associated with Native American burials with appropriate dignity on the property in a location not subject to further subsurface disturbance.

**APM CUL-07. Paleontological Monitoring**

A paleontological monitor will work under the direction of a qualified project paleontologist and will be on site to observe excavation operations that involve the original cutting of previously undisturbed deposits for the eight pole structures located within paleontologically sensitive formations (i.e., Pomerado Conglomerate, Late Pleistocene to Holocene-age channel deposits). A paleontological monitor is defined as an individual who has experience in the collection and salvage of fossil materials.

**APM CUL-08. Unanticipated Discovery of Fossils**

In the event that fossils are encountered, the paleontological monitor would have the authority to divert or temporarily halt construction activities in the area of discovery to allow recovery of fossil remains in a timely fashion. The paleontologist would contact SDG&E's Cultural Resource Specialist and Environmental Project Manager at the time of discovery. The paleontologist, in consultation with SDG&E's Cultural Resource Specialist would determine the significance of the discovered resources. SDG&E's Cultural Resource Specialist and Environmental Project Manager would have to concur with the evaluation procedures to be performed before construction activities would be allowed to resume. Because of the potential for recovery of small fossil remains, it may be necessary to set up a screen-washing operation on site. If fossils are discovered, the paleontologist (or paleontological monitor) would recover them along with pertinent stratigraphic data. In most cases, this fossil salvage can be completed in a short period of time. Because of the potential for recovery of small fossil remains, such as isolated mammal teeth, recovery of bulk sedimentary-matrix samples for off-site wet screening from specific strata may be necessary, as determined in the field. Fossil remains collected during monitoring and salvage would be cleaned, repaired, sorted, cataloged, and deposited in a scientific institution with permanent paleontological collections, and a paleontological monitoring report would be prepared.

**4.5.5 Potential Impacts**

The Proposed Project includes reconductoring, removal of existing wood pole structures, and installation of new steel pole structures for the existing TL 695 and TL 6971 power lines. The operation and maintenance activities required for the power lines will not change from those currently required for the existing system; thus, no additional operation-related impacts related to cultural resources will occur. Furthermore, maintenance will decrease slightly due to the removal of wood pole structures and the installation of steel pole structures. Therefore, the impact analysis is focused on construction activities that are required to install the new conductor, remove the existing wood pole structures, install the new steel pole structures, and establish required access and temporary work areas, as described in Chapter 3.0, Proposed Project Description.

**4.5.5.1 Methodology****Cultural Resources Records Search**

As part of a cultural resources survey carried out for the Proposed Project (HDR 2015a and HDR 2015b; refer to Appendix 4.5-A), a cultural resources records search was carried out with the California Historic Resources Information System, through the South Coastal and South Central Coastal Information Centers for cultural resources and surveys in the vicinity of the Proposed Project area. Additionally, records search data was requested and received from MCB Camp Pendleton for sites and information maintained by MCB Camp Pendleton. According to these records searches, 19 archaeological or historical sites were previously recorded within the Proposed Project area.

### **Native American Scoping**

Native American Consultation for the portion of the Proposed Project that is located on Camp Pendleton will be carried out by the Cultural Resources Branch on Camp Pendleton, following the NEPA process and Section 106 Consultation. To identify additional cultural resources located within the Proposed Project areas that are located off of MCB Camp Pendleton, a search of the Sacred Lands files will be requested by the CPUC from the NAHC through agency-to-agency consultation. The results of this search will be incorporated into this CEQA document. With the implementation of AB 52, lead agencies are now required to offer Native American tribes with an interest in tribal cultural resources located within its jurisdiction the opportunity to consult on CEQA documents. These new procedures under AB 52 provide the tribes with an opportunity to take an active role in the CEQA process in order to protect tribal cultural resources. Therefore, SDG&E will contact the Native American tribes with an interest in the Proposed Project area prior to the release of the CEQA document.

### **Cultural Resources Field Survey Methods**

Archaeological field surveys were carried out in 2013 for a 180-foot corridor (HDR 2013; refer to Appendix 4.5-A) and in 2015 for a 300-foot corridor, to relocate and update any previously recorded cultural resources, as well as to check for the presence/absence of any cultural resources on any previously unsurveyed portions of the Proposed Project area (HDR 2015a). Nineteen previously recorded resources are located within the Proposed Project area however, only seven were relocated and site records were updated with new information. The majority of resources that were not relocated were recorded in the 1970s and 1980s and most likely had incorrect locational data because of limited locational technology during this period.

### **Paleontological Resources**

A records search for paleontological resources in the Proposed Project area and within a 1-mile radius of this area was conducted by the Paleo Solutions at the Department of Paleontology, San Diego Natural History Museum (Aron and Kelly 2011). Relevant published geologic maps and reports, unpublished paleontological reports, and unpublished museum collection locality data were reviewed. There are no known fossil locations within 1 mile of the Proposed Project area. However, the San Diego Natural History Museum used geographic information system (GIS) data to determine the paleontological sensitivity of pole structure locations within the Proposed Project area based on the San Diego Department of Public Works classification system. The San Diego Natural History Museum reported that there are 31 existing pole structures located within moderate paleontological sensitivity (El Adli 2011).

#### **4.5.5.2 Significance Criteria**

According to Section 15002(g) of the CEQA Guidelines, “a significant effect on the environment is defined as a substantial adverse change in the physical conditions which exist in the area affected by the proposed project.” As stated in Section 15064(b) of the CEQA Guidelines, the significance of an activity may vary with the setting. The potential significance of project-related impacts on cultural resources were evaluated for each of the criteria listed in the checklist, as discussed below.

**a) Would the project cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5? *Less than Significant***

On the basis of a recent survey (HDR 2015a), 19 previously recorded resources are located within the Proposed Project area; 15 archaeological or historical sites and 4 isolated finds. One of these resources, the San Mateo Archaeological District (SMAD), was determined to be almost entirely outside of the

Proposed Project area (only one piece of lithic debris was observed in the Proposed Project area) and not located near any proposed construction.

Four previously recorded sites (CA-SDI-4411, CA-SDI-6693, CA-ORA-362/363, and CA-SDI-1075) have a high potential to have intact subsurface remains within the Proposed Project area and have not been evaluated for significance and may qualify as historical resources as identified in CEQA Guidelines Section 15064.5(a). Prior to archaeological testing, all four of these sites are assumed to qualify as “historical resources” as defined by CEQA. Therefore, these four sites will be tested for NRHP. The testing will focus on areas likely to be disturbed by pole structure placement. If the site is determined eligible for listing in the NRHP, any disturbance will be confined to areas already excavated.

Construction of the Proposed Project (including the use of heavy machinery and the excavation of holes for the installation of the power line structures) could potentially impact historical resources by disturbing subsurface soils and disturbing or destroying unknown buried cultural deposits. On the basis of proximity of resources to proposed work areas, sites CA-SDI-4411, CA-SDI-6693, CA-ORA-362/363, and CA-SDI-1075, regardless of whether testing determines that they are eligible for listing in the NRHP, and an additional four resources (CA-SDI-6692, P-37-031944, P-37-031943, and P-37-014370) have been recommended for construction monitoring. Four other archaeological sites (SMAD, CA-SDI-13324, CA-SDI-20979, and CA-SDI-13325) require monitoring during the ingress and egress of equipment for all of the overhead work. Work on existing pole structures in SMAD and CA-SDI-13324 will involve overhead work, pole structure topping, and anchor installation at some locations. One new pole structure will be installed to the west of Cristianitos Road within SMAD. Where new anchors are required, the plans will specify a type of anchor (such as a Manta Ray Earth Anchor) that will not disturb any potential buried cultural deposits. No other potential ground disturbance shall occur at these sites. The remaining seven sites (CA-ORA-1162, CA-SDI-14005, CA-SDI-17544, CA-SDI-17545, CA-SDI-19385, CA-SDI-19386, and P-37-018648) are located far enough away from the Proposed Project that they would not be affected. Impacts to cultural resources will be avoided or minimized through the implementation of the APMs described above.

Therefore, with the implementation of APMs, the Proposed Project's impact relative to a substantial change in the significance of a historical resource will be less than significant.

**b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5? Less than Significant**

As discussed above, the use of heavy machinery and the excavation of holes for the installation of the power line structures could potentially impact prehistoric archaeological sites by disturbing subsurface soils, and potentially disturbing or destroying unknown buried cultural deposits. However, as discussed in impact threshold a) above, the Proposed Project includes APMs that will ensure that impacts on archaeological resources will remain less than significant. Therefore, the Proposed Project's impact relative to a substantial change in the significance of an archaeological resource will be less than significant.

**c) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? Less than Significant**

As described in the paleontological investigation, the San Diego Natural History Museum reported that there are 31 pole structures located within moderate paleontological sensitivity (El Adli 2011). The Proposed Project's APMs include paleontological monitoring and procedures for handling the unanticipated discovery of fossils. Therefore, the Proposed Project's impact relative to the direct or

indirect destruction of unique paleontological resource/site or unique geological feature will be less than significant.

**d) Would the project disturb any human remains, including those interred outside of formal cemeteries? *Less than Significant***

No human remains have been encountered previously within the Proposed Project area. Based on previous work identifying and testing the four sites known to exist in the Proposed Project area, it is unlikely that any contain human remains. Because the project area has been previously surveyed for cultural resources, the potential for an inadvertent discovery of human remains is considered low. However, if there is an inadvertent discovery of human remains during the construction phase of the project, SDG&E will halt work in the vicinity of the find and will implement the appropriate notification processes as required by law (NAGPRA, California Health and Safety Code 7050.5, 8010-8021, and 8025-8030). As a result, disturbance of human remains and impacts to these remains will be less than significant.

**e) Would the project cause a substantial change to Tribal Cultural Resources as defined in Public Resources Code Section 5097.94? *Less than Significant***

As part of the agency-to-agency consultation described above in Section 4.5.6.1, the CPUC will contact the NAHC to request Sacred Lands files to identify Tribal Cultural Resources located outside of MCB Camp Pendleton. It is anticipated that the CPUC will implement mitigation measures as necessary to reduce any impacts to Tribal Cultural Resources to a less than significant level. Therefore, the impact will be less than significant.

#### **4.5.6 References**

- Aron, G. and J. Kelly. 2011. San Diego Gas and Electric, Camp Pendleton Tie Lines Paleontological Assessment and Field Survey Recommendations. Prepared by Paleo Solutions, Inc., Costa Mesa, CA. Report on file with MCB Pendleton Environmental Office.
- City of San Clemente. 2007. City of San Clemente Designated Historic Resources and Landmarks List. Online at [www.mcotter.com/attachments/historic.pdf](http://www.mcotter.com/attachments/historic.pdf). Accessed July 1 2015.
- City of San Clemente. 2014. Centennial General Plan, Land Use Element. February 2014.
- City of San Clemente. 2015. City of San Clemente Long Range Planning. Online at [www.san-clemente.org/departments-services/planning-services/historic-preservation](http://www.san-clemente.org/departments-services/planning-services/historic-preservation). Accessed July 1, 2015.
- Department of the Navy. 2010. Final Environmental Impact Statement for Basewide Utilities Infrastructure at Marine Corps Base Camp Pendleton, California. September 2010.
- Department of the Navy. 2015. Final Environmental Assessment Joint Logistics Over the Shore, Maritime Prepositioning Force, and Field Exercise Training at Marine Corps Base Camp Pendleton, San Diego County, California. May 2015.
- El Adli, J. 2011. Letter to Ms. Geraldine Aron of PaleoSolutions regarding Paleontological record search – C-Pen SDG&E. May 12, 2011.
- HDR. 2013. Wood to Steel Pole Replacement, Cultural Resources Inventory Report, Marine Corps Base Pendleton, San Diego County, California. Prepared for San Diego Gas & Electric Company by K. Tennesen. May 2013.

HDR. 2015a. Cultural Resources Survey for the TL 695 and TL 6971 Reconductor Project, Marine Corps Base Pendleton, San Diego County, California. Prepared for San Diego Gas & Electric Company by K. Tennesen. March 2015.

HDR. 2015b. Recommendations for Cultural Resources Protection and Avoidance for the TL 695 and TL 6971 Reconductor Project. Prepared for San Diego Gas & Electric Company by K. Tennesen. November 2015.

MCB Camp Pendleton. 2010. Base Order 5000.2K Ch1, Base Regulations. June 2015.