

4.4 CULTURAL RESOURCES

The environmental setting, regulatory framework, potential impacts, and mitigation measures concerning Cultural Resources are discussed in 2016 PEIR Section 4.4 and hereby incorporated by reference. The additions/changes to those analyses necessary to make the 2016 PEIR applicable to the revised Project are presented below.

This section addresses the Project's potential impacts concerning cultural resources including historic, archaeological, tribal cultural, and paleontological resources.

4.4.1 EXISTING ENVIRONMENTAL SETTING

2016 PEIR

The existing environmental setting concerning cultural resources is discussed in 2016 PEIR Section 4.4 (page 4.4-1) and the additions/changes necessary to make the 2016 PEIR applicable to the revised Project are presented below.

ADDITIONS/CHANGES SINCE 2016 PEIR

Prehistoric Archaeological and Tribal Cultural Resources

Figure 4.4-1, *Cultural Sensitivity Areas*, depicts areas within the City that have a likelihood of containing cultural or tribal cultural resources (i.e., areas within the Cultural/Natural Resources Overlay (C/NRO) Zone). The following candidate sites are located within culturally sensitive zones:

- Low Sensitivity: None
- Medium Sensitivity: Candidate Sites #1, #5, #6, #10, #12, and #AD8
- High Sensitivity: Candidate Sites #2, #9, #11, #AD1, and #AD2

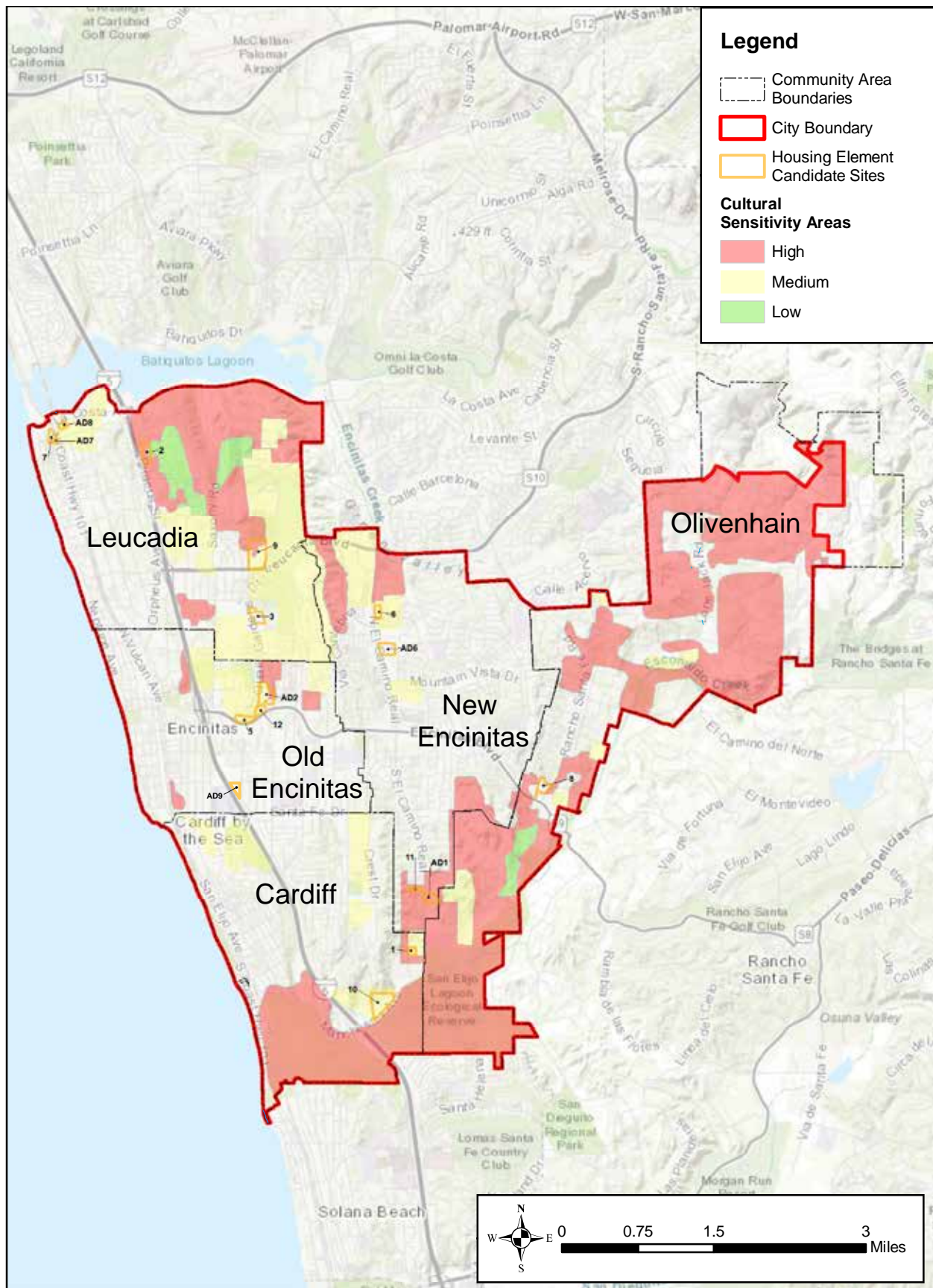
Candidate Sites #3, #7, #8, #AD6, and #AD7 are not located in a culturally sensitive zone.

Undeveloped sites have the potential for the presence of unknown prehistoric/archaeological/tribal cultural resources due to the undisturbed and minimally excavated nature. Previously excavated areas are generally considered to have a low potential for archaeological or tribal cultural resources because the soil containing the resources has been removed or previously disturbed. However, given the locational advantage of the candidate sites and proximity to resources, the potential for archaeological or tribal cultural resources exists.

Historic Resources

City staff has verified there is no evidence of historic resources within any of the candidate sites, or within 50 feet of the candidate sites.¹

¹ Email Correspondence: Vurbef, Scott, Environmental Project Manager, City of Encinitas Development Services, April 30th, 2018.



Source: City of Encinitas, GIS.



Human Remains/Burial Grounds

As previously noted, several candidate sites are within culturally sensitive zones. Undeveloped sites have the potential for the presence of unknown archaeological and tribal cultural resources due to the undisturbed and minimally excavated nature. None of the candidate sites are located on any known burial grounds or cemeteries.

Paleontological Resources

To evaluate the potential for paleontological resources within the candidate sites, the presence and distribution of geologic formations was reviewed. Figure 4.4-2, *Geologic Formations*, depicts the geologic formations that cover the City. Two geologic formations, Torrey Sandstone (Tt) and Del Mar formation (Td), are known to have a higher likelihood of containing paleontological resources. Torrey Sandstone is identified within or proximate to Candidate Sites #2; #9; #3; #AD2; #5; #12; #11; #AD1; #6; and #AD6. The Del Mar Formation is identified within or proximate to Candidate Sites #10; #8; and #1. Candidate Sites #7, #AD7, #AD8, and #AD9 are located within Old Paralac Deposits Undivided which does not have a high likelihood of containing sensitive paleontological resources.

4.4.2 REGULATORY FRAMEWORK

2016 PEIR

The regulatory framework concerning cultural resources, which is discussed in 2016 PEIR Section 4.4.2 (page 4.4-8), applies to the revised Project. No additions/changes are necessary to make the 2016 PEIR applicable to the revised Project.

ADDITIONS/CHANGES SINCE 2016 PEIR

All regulations covered in the 2016 PEIR are applicable. No additions/changes are necessary.

4.4.3 SIGNIFICANCE DETERMINATION THRESHOLDS

Consistent with the 2016 PEIR and in substantial conformance with CEQA Guidelines Appendix G, impacts related to cultural, tribal cultural, and paleontological resources would be significant if the Project would:

- Result in the alteration, including the adverse physical or aesthetic effects and/or the destruction of a prehistoric or historic structure, object or site (see Issue 1).
- Result in any impact to existing religious or sacred uses within the potential impact area (see Issue 2).
- Allow development to occur that could significantly impact a unique paleontological resource or a geologic formation possessing a moderate to high fossil bearing potential (see Issue 3).
- Result in the disturbance of any human remains, including those interred outside of formal cemeteries (see Issue 4).
- Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k) (see Issue 5).



Tt
 Td
 Tsa
 Qop2-4
 Qop6-7
 Qvop10-11
 Qvop13
 Qya
 Qpe
 City Boundary
 Candidate Sites

- Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe (see Issue 5).

4.4.4 IMPACTS AND MITIGATION MEASURES

4.4.4 - Issue 1: Historical Resources

Would the Project result in the alteration, including the adverse physical or aesthetic effects, and/or the destruction of a prehistoric or historic structure, object or site?

IMPACTS:

2016 PEIR

The potential impacts concerning historical resources are discussed in 2016 PEIR Section 4.4.5 (Issue 1, page 4.4-16). The 2016 PEIR concluded that impacts to historical resources would be significant if future development would cause a substantial adverse change in the significance of a historical resource. Direct impacts to historical resources could potentially result from the physical demolition, destruction, relocation, or alteration of potential historical resources at the housing sites. Various housing sites were identified as containing potentially significant historical structures/sites. Additionally, the analysis concluded because project implementation had development potential over the next 20+ years, several housing sites contain buildings or structures that may be 50 years of age or older at the time of future development. Therefore, various housing sites were identified as needing evaluation for historical significance. The analysis concluded that implementation of Mitigation Measure CUL-1 would reduce impacts concerning the alteration/destruction of a historic structure, object, or site. Although significant impacts to historical resources may be mitigated through future review of project-specific development proposals, specific mitigation at the program-level was not available since specific development projects were not known at the time PEIR preparation. Therefore, the 2016 PEIR concluded impacts to historical resources were significant and unavoidable.

The additions/changes necessary to make the 2016 PEIR applicable to the revised Project are presented below.

ADDITIONS/CHANGES SINCE 2016 PEIR

National Register of Historic Places (NRHP). There are no NRHP-designated historical resources located on or within 50 feet of the candidate sites. Therefore, no direct impact to NRHP-designated historical resources would occur with Project implementation.

California Register of Historic Places. There are no CRHR-designated historical resources located on or within 50 feet of the candidate sites. Therefore, no direct impact to CRHR-designated historical resources would occur with Project implementation.

Historic Structures. There are no historic structures present on the candidate sites. Therefore, the Project would not result in the alteration (adverse physical or aesthetic effects) or destruction of a historic

structure, object, or site. Notwithstanding where the City has determined a potential for impacts to historical resources to occur, Mitigation Measure CUL-1 requires verification of the age and original structural integrity of all onsite structures, and that a qualified professional historian determine whether the affected building/structure is historically significant. If present, historically significant resources would be identified through site-specific reconnaissance in conjunction with future development, which would be required to comply with applicable Federal and State laws concerning the preservation of historical resources. Therefore, with Mitigation Measure CUL-1, the Project would result in a less than significant impact concerning alteration/destruction of a historic structure, object, or site.

GENERAL PLAN POLICIES AND MITIGATION MEASURES:

GENERAL PLAN POLICIES:

Refer to Appendix E, *Relevant General Plan Policies*, for the full text of these policies.

- RME Policy 7.1
- RME Policy 7.2

MITIGATION MEASURES:

The mitigation measures concerning cultural resources/historical resources identified in 2016 PEIR Section 4.4.5 are presented below, inclusive of any additions/changes necessary for the revised Project (indicated by "~~deleted text~~" / "underlined text").

CUL-1: Applications for future development of housing sites consistent with the new zone program, wherein the City has determined a potential for impacts to historical resources, shall be required to comply with the following mitigation framework:

- a) Prior to the issuance of any permit for a future development project, the age and original structural integrity and context of any buildings/structures occurring on the housing sites shall be verified. The project applicant shall submit in conjunction with the development permit application, verification of the age and original structural integrity of all on-site structures.
- b) For any building/structures in excess of 50 years of age having its original structural integrity intact, a qualified professional historian shall determine whether the affected building/structure is historically significant. The evaluation of historic architectural resources shall be based on criteria such as age, location, context, association with an important person or event, uniqueness, or structural integrity, as indicated in CEQA Guidelines Section 15064.5. A historical resource report shall be submitted by the project applicant to the City and shall include the methods used to determine the presence or absence of historical resources, identify potential impacts from the proposed project, and evaluate the significance of any historical resources identified.

LEVEL OF SIGNIFICANCE: Less than Significant with Mitigation Incorporated

4.4.4 - Issue 2: Archaeological Resources

Would the Project result in the alteration, including the adverse physical or aesthetic effects, and/or the destruction of a prehistoric or historic structure, object or site?

Would the Project result in any impact to existing religious or sacred uses within the potential impact area?

IMPACTS:**2016 PEIR**

The potential impacts concerning archaeological resources are discussed in 2016 PEIR Section 4.4.6 (Issue 2, page 4.4-19) and the additions/changes necessary to make the 2016 PEIR applicable to the revised Project are presented below. The 2016 PEIR indicated that the project did not specifically propose alteration of a known archaeological resource or propose ground-disturbing activities such as grading or excavation but assumed that future development of the housing sites had the potential to directly or indirectly impact undiscovered subsurface archaeological resources through such activities. Various housing sites consisted, at least in part, of undeveloped land and/or were mapped as having “high sensitivity” for cultural archaeological resources. The 2016 PEIR concluded potential direct and/or indirect impacts to archaeological resources would be considered significant and require implementation of Mitigation Measure CUL-2. Despite mitigation, the 2016 PEIR concluded the project would result in significant unavoidable impacts.

REVISED PROJECT

The following candidate sites are located within a culturally sensitive zone:

- | | |
|-------|--------|
| • #1 | • #11 |
| • #2 | • #12 |
| • #5 | • #AD1 |
| • #6 | • #AD2 |
| • #9 | • #AD8 |
| • #10 | |

Therefore, the revised Project could result in the alteration (i.e., adverse physical or aesthetic effects) and/or destruction of a prehistoric structure, object, or site, if present on these candidate sites. Moreover, although remote, the Project could result in the alteration/destruction of a prehistoric structure, object, or site on Candidate Sites #3, #7, #8, #AD6, and AD7, which are not located within a culturally sensitive zone, and/or consist, at least in part, of undeveloped land.

While the HEU does not specifically propose ground-disturbing activities, it can be assumed that future development could potentially directly or indirectly impact undiscovered subsurface archaeological resources through such activities. Direct impacts could potentially result from the physical demolition, destruction, relocation, or alteration of potential prehistoric/archaeological resources. Overall, the Project could result in the alteration (adverse physical/aesthetic effects) and/or destruction of an undiscovered prehistoric/archaeological structure, object, or site. To address potential impacts to undiscovered archaeological resources, future development would be subject to compliance with EGP Policies 7.1 and 7.2, which require cultural resources to be documented, preserved, or salvaged if threatened by new development, and require surveys to identify historic structures and archaeological/cultural sites to ensure that every action is taken to ensure their preservation, respectively. Future development within the C/NRO Zone is subject to compliance with EMC Code § 30.34.050, which requires

that a survey be conducted by a qualified professional historian to determine a site's significance and need for mitigation. To further reduce impacts to undiscovered archaeological resources, future development would be subject to Mitigation Measure CUL-2, which requires an archaeological survey be conducted prior to issuance of any permit. Although future projects would be required to comply with EGP Policies 7.1 and 7.2, EMC §30.34.050, and Mitigation Measure CUL-2, the Project would have the potential to result in significant and unavoidable impacts concerning the alteration/destruction of an archaeological/prehistoric structure, object, or site.

GENERAL PLAN POLICIES AND MITIGATION MEASURES:

GENERAL PLAN POLICIES:

Refer to Appendix E, *Relevant General Plan Policies*, for the full text of these policies.

- RME Policy 7.1
- RME Policy 7.2

MITIGATION MEASURES:

The mitigation measures concerning archaeological resources identified in 2016 PEIR Section 4.4.6 are presented below, inclusive of the additions/changes necessary for the revised Project (indicated by "~~deleted text~~" / "underlined text").

CUL-2: Applications for future development of housing sites consistent with the new zone program, wherein the City has determined a potential for impacts to ~~historical~~ archaeological and tribal cultural resources, shall be required to comply with the following mitigation framework:

Prior to the issuance of any permit for future development consistent with the new zone program located on a previously undisturbed housing site, an archaeological survey shall be conducted by a qualified archaeologist to evaluate the presence of archaeological and tribal cultural resources and the need for project impact mitigation by preservation, relocation, or other methods. An archaeological resource report shall be submitted by the project applicant to the City and shall include the methods used to determine the presence or absence of archaeological/tribal cultural resources, identify potential impacts from the proposed project, and evaluate the significance of any archaeological/tribal cultural resources identified. If potentially significant impacts to an identified archaeological/tribal cultural resources are identified, the report shall also recommend appropriate mitigation to reduce the impacts to below a level of significance. ~~The archaeological survey should include a records search at the South Coastal Information Center branch of the California Historical Research Information System, to determine if previously recorded prehistoric or historic archaeological resources exist on the housing site. In addition, the Native American Heritage Commission should be contacted to perform a Sacred Lands File Search. An archaeological resource report detailing the results of the record search, Sacred Lands Search, and the field survey of the housing site shall be submitted by the project applicant to the City. The report shall include the methods used to determine the presence or absence of archaeological resources, identify potential impacts from the proposed project, and evaluate the significance of any archaeological resources identified. If potentially significant impacts to an identified archaeological resource are identified, the report shall also recommend appropriate mitigation to reduce the impacts to below a level of significance. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure. Reports shall be submitted to the South Coastal Information Center upon finalization.~~

LEVEL OF SIGNIFICANCE: Significant and Unavoidable**4.4.4 - Issue 3: Paleontological Resources**

Allow development to occur that could significantly impact a unique paleontological resource or a geologic formation possessing a moderate to high fossil bearing potential?

IMPACTS:**2016 PEIR**

The potential impacts concerning paleontological resources are discussed in 2016 PEIR Section 4.4.7 (Issue 3, page 4.4-21). Future development would potentially require grading on sites containing undisturbed deposits of Torrey Sandstone and/or the Del Mar formation, which was determined to significantly impact subsurface paleontological resources. As the site-specific details are unknown at this program-level of analysis, the 2016 PEIR concluded it was unknown whether direct or indirect impacts to paleontological resources would be potentially significant. Analysis concluded that adherence to EGP Policy 7.2 and Mitigation Measure CUL-3, which requires paleontological monitoring, would reduce impacts related to unique paleontological resources to less than significant level.

The additions/changes necessary to make the 2016 PEIR applicable to the revised Project are presented below.

REVISED PROJECT

While the Project does not specifically propose ground-disturbing activities, future development would grade candidate sites containing undisturbed deposits of Torrey Sandstone and/or the Del Mar formation, which are known to have a higher likelihood of containing paleontological resources. The following sites are categorized by Torrey Sandstone/Del Mar formation (see Figure 4.4-2):

- Torrey Sandstone (Tt): Candidate Sites #2, #9, #3, #AD2, #5, #12, #11, #AD1, #6, #AD6
- Del Mar formation (Td): Candidate Sites #10, #8, and #1

Additionally, various candidate sites are located on or near geologic formations that are known to contain significant vertebrate fossils. These candidate sites could be underlain by geological formations with moderate to high resource potential to contain paleontological resources. Therefore, development on these sites could impact a unique paleontological resource or a geologic formation. Future development would be subject to compliance with EGP Policy 7.1, which requires that paleontological resources be documented, preserved, or salvaged if threatened by new development. Additionally, where the City has determined a potential for candidate site development to impact paleontological resources, and where development would require (1) the excavation of over 1,000 cubic yards of a geologic formation with high resource potential to contain paleontological resources; (2) excavation depths within the geologic formation of 10 feet or greater; or (3) over 2,000 cubic yards of a geologic formation with moderate resource potential to contain paleontological resources, Mitigation Measure CUL-3 is required. The measure requires that a qualified paleontological monitor be present during grading. Geologic formations would be determined by a site-specific geotechnical study. Following compliance with EGP Policy 7.1 and Mitigation Measure CUL-3, the Project's potential impacts to a unique paleontological resource or a geologic formation would be less than significant.

GENERAL PLAN POLICIES AND MITIGATION MEASURES:

GENERAL PLAN POLICIES:

Refer to Appendix E, *Relevant General Plan Policies*, for the full text of these policies.

- RME Policy 7.1

MITIGATION MEASURES:

The mitigation measures concerning paleontological resources identified in 2016 PEIR Section 4.4.7 are presented below, inclusive of the additions/changes necessary for the revised Project (indicated by “~~deleted text~~” / “underlined text”).

CUL-3: Applications for future development of housing sites consistent with the new zone program, wherein the City has determined a potential for impacts to paleontological resources, shall be required to comply with the following mitigation framework:

A qualified paleontological monitor shall be present during grading on housing sites where development would require the excavation of over 1,000 cubic yards of a geologic formation with high resource potential to contain paleontological resources, excavation depths within the geologic formation of 10 feet or greater, or over 2,000 cubic yards of a geologic formation with moderate resource potential to contain paleontological resources. Geologic formations would be determined by a site-specific geotechnical study. The monitor shall have the authority to stop and/or divert grading, trenching, or excavating if a significant paleontological resource is encountered. An excavation plan shall be implemented to mitigate the discovery. Excavation shall include the salvage of the fossil remains (simple excavation or plaster-jacketing of larger and/or fragile specimens); recording stratigraphic and geologic data; and transport of fossil remains to laboratory for processing and curation.

LEVEL OF SIGNIFICANCE: Less than Significant with Mitigation Incorporated

4.4.4 - Issue 4: Human Remains

Result in the disturbance of any human remains, including those interred outside of formal cemeteries?

IMPACTS:

2016 PEIR

The potential impacts concerning human remains are discussed in 2016 PEIR Section 4.4.8 (Issue 4, page 4.4-23). 2016 PEIR analysis concluded there are no known burial sites or cemeteries within the City’s vicinity. In the unlikely event that human remains are discovered, then the provisions set forth in California Public Resources Code § 5097.98 and State Health and Safety Code § 7050.5 would be implemented in consultation with the assigned Most Likely Descendant as identified by the Native American Heritage Commission (NAHC). No further construction activities would be permitted until the coroner is contacted, as well as any applicable Native American tribes. Although grading activities associated with development of all housing sites was determined to have the potential to inadvertently uncover human remains, State regulations control the procedures that must take place under these circumstances. Potential impacts to human remains were determined to be less than significant.

The additions/changes necessary to make the 2016 PEIR applicable to the revised Project are presented below.

REVISED PROJECT

There are no known burial sites or cemeteries in the City and the record search of the NAHC Sacred Lands File was completed for the area with negative results. Further, given the urbanized nature of the candidate sites, there is a low potential for future development to uncover human remains. Notwithstanding, several candidate sites are within high cultural sensitivity zones. If human remains are found, those remains would require proper treatment in accordance with applicable laws, including State Health and Safety Code §§7050.5-7055 and California Public Resources §§ 5097.98 and 5097.99. Therefore, compliance with the established regulatory framework (i.e., Health and Safety Code §§ 7050.5 through 7055 and PRC §§5097.98 and 5097.99) would ensure potential impacts concerning human remains resulting from future development are reduced to less than significant. Implementation of Mitigation Measure CUL-2 would further minimize potential impacts in this regard.

GENERAL PLAN POLICIES AND MITIGATION MEASURES:

GENERAL PLAN POLICIES:

No General Plan policies apply to human remains.

MITIGATION MEASURES:

No mitigation measures concerning cultural resources/human remains were identified in 2016 PEIR Section 4.4.8 and none are necessary for the revised Project.

LEVEL OF SIGNIFICANCE: Less than Significant Impact

4.4.4 - Issue 5: Tribal Cultural Resources

Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?*
- b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?*

IMPACTS:

2016 PEIR

The 2016 PEIR noted that the City completed a consultation with local Native American tribes, consistent with Senate Bill 18 requirements. The CEQA thresholds identified above for Issue 5 had not yet been adopted and therefore a separate discussion of tribal cultural resources was not required.

The additions/changes necessary to make the 2016 PEIR applicable to the revised Project are presented below.

REVISED PROJECT

SB 18 (Government Code § 65352.3) requires local governments to consult with California Native American tribes identified by the Native American Heritage Commission (NAHC) to avoid, protect, and/or mitigate impacts to cultural places in creating or amending general plans, including specific plans. In compliance with SB 18 requirements, the City contacted the following tribes/ representatives:

- San Pasqual Band of Mission Indians, Allen Lawson
- Sycuan Band of the Kumeyaay Nation, Cody Martinez
- Viejas Band of Kumeyaay Indians, Robert Welch
- Barona Group of the Capitan Grande, Edwin Romero
- Campo Band of Mission Indians, Ralph Goff
- Ewiiapaayp Tribe, Robert Pinto and Michael Garcia
- Gabrieleño/Tongva Tribe, Charles Alvarez
- Jamul Indian Village, Erica Pinto
- La Posta Band of Mission Indians, Gwendolyn Parada and Javaughn Miller
- Mesa Grande Band of Mission Indians, Virgil Oyos
- Pauma Band of Luiseno Indians – Pauma and Yuima Reservation, Temet Aguilar
- Manzanita Band of Kumeyaay Nation, Angela Elliott Santos
- Lipay Nation of Santa Ysabel, Virgil Perez
- Kwaaymii Laguna Band of Mission Indians, Carmen Lucas
- Inaja Band of Mission Indians, Rebecca Osuna
- Mesa Grande Band of Mission Indians, Mario Morales

The City received one response- from the Viejas Band of Kumeyaay Indians, which communicated that the Project area may contain sites sacred to the Kumeyaa people. Adequate buffer zones were requested. As of the writing of this EA, none of the tribes contacted by the City have requested consultation.

While many of the candidate sites have been extensively altered by prior ground disturbance and development, the potential exists for future development to affect previously unidentified tribal cultural resources. Future development construction activities could include excavation and grading. Mitigation Measure CUL-2 has been identified to mitigate this potential impact. Although future development would be subject to compliance with EGP Policies 7.1 and 7.2, EMC §30.34.050, and Mitigation Measure CUL-2, the Project would have the potential to result in significant and unavoidable adverse change in the significance of a tribal cultural resource.

GENERAL PLAN POLICIES AND MITIGATION MEASURES:

GENERAL PLAN POLICIES:

Refer to Appendix E, *Relevant General Plan Policies*, for the full text of these policies.

- RME Policy 7.1
- RME Policy 7.2

MITIGATION MEASURES:

See Mitigation Measure CUL-2 above.

LEVEL OF SIGNIFICANCE: Significant and Unavoidable Impact

4.4.5 SIGNIFICANT UNAVOIDABLE IMPACTS

Despite compliance with EGP Policies 7.1 and 7.2, EMC §30.34.050, and Mitigation Measure CUL-2, the Project would have potential to result in significant and unavoidable impacts concerning the alteration/destruction of an archaeological/prehistoric structure, object, or site, and an adverse change in the significance of a tribal cultural resource.

4.4.6 SOURCES CITED

Email Correspondence: Vurbeff, Scott, Environmental Project Manager, City of Encinitas Development Services, April 30, 2018.