



MEMO

From: Mary Robbins-Wade, Director of Cultural Resources
Reference: Otay Crossings Revised Tentative Map (TM 5405 RPL7R2) –
Cultural Resources Analysis (Affinis Job No. 2232)
Date: November 7, 2012

The proposed project involves revisions to the approved Tentative Map (TM 5405 RPL7) and Preliminary Grading Plan for the 311.5-acre Otay Crossings Commerce Park property in the East Otay Mesa area, as well as revisions to the off-site roadway and utility improvements to support the project development. As described below, the impacts to cultural resources from the revised TM do not differ substantially from the impacts associated with the approved project.

Project Background

Due to issues with intersection spacing caused by advance freeway engineering, the project has been redesigned to reconfigure the proposed alignments of Lonestar Road, Airway Road, and Siempre Viva Road, resulting in the loss of 12 lots. Open space lots remain unchanged. The future Airway Road, west and south of the project will be developed by others, as will the future Siempre Viva Road south of the project site on the Otay Business Park property. Off-site improvements to Airway Road west of the project proposed under the approved project are no longer required for the revised TM.

Cultural Resources

Fourteen archaeological sites have been identified wholly or partially within the Otay Crossings project area, 12 of which would be subject to impacts from development of the project. Under the revised TM, direct impacts to cultural resources would be the same as under the previously approved TM. Two sites (CA-SDI-8076/8079 and CA-SDI-8652) are within open space easements in the southernmost portion of the property; the other 12 sites (CA-SDI-8078, CA-SDI-8080, CA-SDI-10,299, CA-SDI-11,793, CA-SDI-11,794, CA-SDI-11,799H, CA-SDI-11,800, CA-SDI-11,801, CA-SDI-11,802H, CA-SDI-15,872, CA-SDI-15,873, and CA-SDI-15,875) are within the impact footprint.

As addressed in the FEIR, CA-SDI-11,799H is located mainly south of the project area but may extend into the TM area. As such, the project may have significant effects to this resource. A testing program conducted for the property to the south of the Otay Crossings Commerce Park determined that CA-SDI-11,799H is a significant resource under CEQA and County guidelines, but the site does not meet the criteria of RPO significance. A data

recovery program was made one of the conditions of approval of the Otay Crossings project. That requirement is still valid for the revised TM.

In terms of off-site impacts to cultural resources, improvements to Airway Road to the west of the project are no longer proposed, and three sites along Airway Road would no longer be subject to direct impacts. These three sites (CA-SDI-8078, CA-SDI-11,798, and CA-SDI-12,886) have been determined not to be significant resources.

Similar to the approved project, the proposed western alignment of Siempre Viva Road and improvements to Alta Road (and the underlying sewer alignment) would cross the mapped locations of CA-SDI-8081 and CA-SDI-12,888H. In 2006, Affinis conducted a testing program at portions of CA-SDI-8081, along Alta Road and the proposed sewer alignment within the segment of Siempre Viva Road west of Alta Road. A few artifacts were noted on Alta Road, no surface artifacts were noted along Siempre Viva Road, and no cultural material was found in the 20 shovel test pits (STPs) excavated. Therefore, the portion of CA-SDI-8081 that would be affected by the roadway improvements and sewer alignment was determined not to be a significant resource.

Subsequent to that work, Brian F. Smith and Associates (BFSA) conducted a similar testing program in conjunction with off-site improvements for the proposed Otay Business Park project. That testing program included the excavation of STPs farther west of those done by Affinis. A relatively small (219 m²) shell midden area was identified at the far western end of the site, yielding marine shell, debitage, and one flaked stone tool. While that testing program concluded that the majority of CA-SDI-8081 that would be affected by off-site improvements is not a significant resource similar to the Affinis study, the BFSA study concluded that the shell midden locus does have research potential and was identified as a significant resource under CEQA and County guidelines. The locus is not RPO-significant. Based on the presence of the new focused locus along the alignment of Siempre Viva Road, a data recovery program for this portion of CA-SDI-8081 was recommended by BFSA as part of the Otay Business Park project EIR. That document underwent public review and was subsequently certified by the County.

CA-SDI-12,888H was originally described as a scatter of historic artifacts in the “same location as a structure that was seen in the historic map check for 1880.” The site could not be tested by Affinis, due to the presence of nesting burrowing owls. A data recovery program at this site was made a condition of the approved project. Subsequent to the Affinis study, BFSA conducted a limited testing program adjacent to CA-SDI-12,888H in conjunction with the proposed extension of Airway Road. Four STPs were excavated along that proposed roadway, and no cultural material was found. That testing program did not include any excavation along Alta Road, where the potential for cultural material associated with CA-SDI-12,888H remains. Therefore, the requirement for data recovery at this site is still valid for the revised TM.

Due to the potential for subsurface cultural resources, monitoring of grading was made a condition of approval of the approved project. This condition is still valid for the revised TM.

Conclusions

Under the revised TM, impacts to cultural resources within the project boundaries would be the same as those from the approved project. Impacts to cultural resources in the off-site improvements would be somewhat different from those addressed for the approved project, but similar to those identified in the Otay Business Park EIR.

Three sites that would have been subject to direct impacts from off-site improvements under the approved project will no longer be affected under the revised TM, but these sites are not significant resources, so no mitigation measures had been required related to them. Significant impacts have been identified to a portion of CA-SDI-8081 that had not been addressed in the previous Affinis study for the approved project but had been identified in the BFSAs study and EIR prepared for the Otay Business Park project. These impacts would be mitigated through a data recovery program. The approved project already includes measures for data recovery at CA-SDI-11,799H and CA-SDI-12,888H. Thus, the data recovery program could be expanded to include the new CA-SDI-8081 locus as part of the same mitigation condition.

Within the addition of the site number for the CA-SDI-8081 locus into the conditions wording, the conditions placed on the project relating to cultural resources, dated October 7, 2011, would still be valid.

If you have any questions, you can reach me at (619) 441-0144 extension 101 or mary@affinis.net.