

O-14 San Diego County Archaeological Society, Inc.

Comment Letter O-14



San Diego County Archaeological Society, Inc.

Environmental Review Committee

13 August 2017

To: Ms. Ashley Smith  
Department of Planning and Development Services  
County of San Diego  
5510 Overland Avenue, Suite 310  
San Diego, California 92123

Subject: Draft Environmental Impact Report  
Newland Sierra  
PDS2015-GPA-15-001, PDS2015-SP-15-001, PDS-REZ-15-001,  
PDS2015-TM-5597, Log No. PDS2015-ER-15-08-001

Dear Ms. Smith:

I have reviewed the cultural resources aspects of the subject DEIR on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained in the DEIR and the cultural resources appendix for the project, and recognizing the sensitive nature of some of the resources involved and the negotiations which have taken place to date, we have the following comments on the cultural resources mitigation measures in Section 7.4 of the DEIR:

1. Where an archaeological monitor and/or a Native American monitor is mentioned, the number of such monitors must be understood to be more than one to accommodate the nature and possible multiple locations of work requiring monitoring, at the discretion of the project archaeologist and the San Luis Rey and Pechanga Band monitors.
2. As an editorial comment, throughout the section, the term "internment" should be changed to "interment".
3. Regarding the 3-D scanning in M-CR-5.d, the sample size should be as deemed appropriate by the project archaeologist and include any additional material which the Bands wish to include. Each scanned item must be 3-D printed to confirm the quality of the scan and the digital files and a sample 3-D print must be curated at a County-approved facility meeting the standards of 36CFR79. Additional prints and copies of the digital files should be provided to the Bands, as requested.
4. Historic materials mentioned in M-CR-5.f shall be curated in a County-approved facility meeting the standards of 36CFR79.

P.O. Box 81106 San Diego, CA 92138-1106 (858) 538-0935

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O-14-5

# Comment Letters

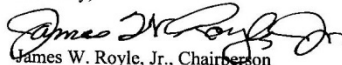
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5. The final report cited in M-CR-5.g must clearly document which materials were reentered, which were 3-D scanned and to whom files and prints were provided, and which were provided for curation.
6. We appreciate the treatment to be afforded the pictograph at SDI-9822, and suggest the involvement of Ken Hedges in the program. The final report developed should be included in the final report for the project.
7. The cap mentioned in M-CR-7.b.4 requires further definition in the DEIR. The depth of the cap and the nature of the capping soil must be defined. For example, it must be culturally-sterile, chemically-uncontaminated, and potentially visually-distinctive, so that any incursion can be identified in the future. Likewise, the cap mentioned in M-CR-8.c must be addressed.
8. The second bullet of M-CR-7.b.6 includes ambiguous wording. In the first sentence, it is not clear whether "if feasible" refers to "shall be examined in the field", "in the presence of a Luiseño Native American monitor", or "by a forensic anthropologist or osteologist". Please revise the sentence to clarify, or delete "if feasible".
9. Mitigation measure M-CR-7.d should be revised to address the 3-D scans and prints addressed above.

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SDCAS appreciates the opportunity to review and offer the above comments on the cultural resources component of this project.

Sincerely,

  
James W. Royle, Jr., Chairperson  
Environmental Review Committee

cc: Dudek  
SDCAS President  
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