Archeological Inventory and Evaluation Report for the
Sunroad—East Otay Mesa Specific Plan Amendment,
San Diego County, California

Sunroad – East Otay Mesa Specific Plan Amendment
PDS2015-REZ-15-007, PDS2015-ER-98-190-13G

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NATIONAL ARCHAEOLOGICAL DATABASE INFORMATION

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Client/Project Proponent: Sunroad Otay Partners, L.P.


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Report Title: Archaeological Inventory and Evaluation Report for the Sunroad – East Otay Mesa Specific Plan Amendment, San Diego County, California

Type of Study: Record Search, Literature Review, and Field Visit

New Sites: None

Updated Sites: CA-SDI-9975, CA-SDI-12337, CA-SDI-12730, P-37-31491

USGS Quad: Otay Mesa

Acreage: 253.13

Keywords: Otay Mesa 7.5-minute quadrangle, Temporary Camp, Quarry, Historic Structure Location, CA-SDI-9975, CA-SDI-12337, CA-SDI-12730, P-37-31491, Otay Mesa Road
EXECUTIVE SUMMARY

This document presents the results of a cultural resources survey and evaluation for the Sunroad – East Otay Mesa Specific Plan Amendment Project (Project). The approximately 253.13 acre project is located in the East Otay Mesa area of San Diego County, California. The Project proponent proposes the creation of a Specific Plan Amendment which would allow for the establishment of a mix of employment, retail, and residential uses, along with an open space easement. Five wetland basins for vernal pool creation will be located within the open space easement.

Gallegos and Associates, Inc. (Gallegos) performed the original survey in 2008 which was submitted to and approved by the County of San Diego (County). However, the Project was put on hold for several years. As the survey was more than five years old, ASM Affiliates, Inc. (ASM) was contracted by Sunroad Otay Partners, L.P. in 2016, to complete an updated cultural resource inventory and evaluation associated with the Project. ASM updated the record search and literature review, updated the search of Sacred Lands File held by the NAHC, and performed a field check to confirm the results of the Gallegos 2008 study.

This study was completed to satisfy requirements of the California Environmental Quality Act (CEQA), which requires evaluation of the historical significance of cultural resources and the significance of potential adverse effects on lands planned for development. ASM prepared this report in compliance with County of San Diego Guidelines for Determining Significance (County of San Diego 2007a), Report Format and Content Guidelines (County of San Diego 2007b), Resource Protection Ordinance (RPO), Section 21083.2 of the Public Resources Code, and the San Diego County CEQA Guidelines. The results of this archaeological and historical resources inventory and evaluation program will assist the County in determining the direct and indirect construction impacts to resources and with the creation of a preservation plan or mitigation for any significant resources.

Based on the Gallegos 2008 and the ASM 2016 studies three cultural resource sites, one historic structure, and one historic road alignment have been recorded within the Project area. Only one of the sites, SDI-12337, will be impacted by the proposed project design. The historic structure is no longer present within the Project area, the remaining two sites, SDI-9975 and SDI-12730, are located in the open space easement and will not be impacted. The Project will not have an impact on the historic road alignment, P-37-31491, Otay Mesa Road.

All field notes and photographs from ASM’s survey are on file at ASM’s office in Carlsbad. All artifacts from previous testing programs for sites within the Project area have been curated at the San Diego Archaeological Center (SDAC). California Department of Parks and Recreation (DPR) forms for each resource documented are provided as a confidential appendix to this report, and have been submitted to the South Coastal Information Center (SCIC) of the California Historical Resources Information System (CHRIS) at San Diego State University (SDSU).
1.0 INTRODUCTION

This report documents the results of an archaeological survey and evaluation for the Sunroad – East Otay Mesa Specific Plan Amendment Project (Project) which was conducted to provide compliance with the County of San Diego Guidelines, the County Resource Protection Ordinance (RPO), and the California Environmental Quality Act (CEQA). The Project proponent is planning a mixed-use residential, employment, and retail development on private lands in San Diego County, California. ASM Affiliates, Inc. (ASM) was contracted by Sunroad Otay Partners, L.P. to complete a cultural resources inventory and evaluation for this project. Gallegos & Associates (Gallegos) conducted the original survey and evaluation fieldwork in 2008 (Appendix E); however, the project was put on hold. The Gallegos 2008 report was approved by the County. The Gallegos initial study included a records search, initiation of Native American consultation with the California Native American Heritage Commission (NAHC), and an intensive pedestrian survey of 100 percent of the project area.

Subsequently, in 2016, ASM was contracted by Sunroad Otay Partners, L.P. to update the record search and literature review, the search of Sacred Lands File held by the NAHC, and perform a field check to confirm the results of the Gallegos 2008 study.

Reported below are the findings from the Gallegos 2008 study and ASM’s updates to the cultural resources study. The report was compiled in accordance with the County of San Diego Guidelines for Determining Significance (County of San Diego 2007a) and Report Format and Content Guidelines (County of San Diego 2007b), the RPO, Public Resources Code Section 21083.2 (CEQA), and the County of San Diego CEQA Guidelines. This report addresses the direct construction impacts to resources and makes an assessment of impact severity as outlined in Section 4.2 of the County Guidelines. Sections written by Gallegos personnel are noted as such.

1.1 PROJECT DESCRIPTION

The proposed Sunroad – East Otay Mesa Specific Plan Amendment Project (Project) site is located within the approved East Otay Mesa Business Park Specific Plan and encompasses approximately 253.13 acres, including approximately 218.12 acres of lot area and approximately 35.01 acres of right-of-way area (Figures 1, 2, and 3). The project proposes a Specific Plan Amendment to the East Otay Mesa Business Park Specific Plan to establish new mixed-use Village Core area, which would allow for the establishment of a mix of employment, retail, and residential uses. Approval of the Project would allow for the entitlement of a maximum of 3,158 dwelling units, 78,000 square feet of general commercial uses, and 765,000 square feet of employment uses, and approximately 51.3 acres of permanent biological open space. The Project also includes a Vesting Tentative Map (TM) to subdivide the land and a Supplemental Environmental Impact Report (SEIR) will be prepared to evaluate the associated environmental impacts. The Project’s TM (Figure 4) includes off-site improvements including a proposed drainage, storm drain outfall, and sewer line connection west of the Project area, half-width improvements to Vann Center Boulevard from Otay Mesa Road to south of Lone Star Road, and to Zinser Road from west of Sunroad Boulevard to Alejandro Drive, and a drainage basin on the eastern side of the Project area. In addition five wetland basins will be created for vernal pools in the Open Space area. All off-site improvements have been evaluated as part of the Project.

The Project is subject to the County’s General Plan Regional Category Village and General Plan Land Use Designation Specific Plan Area. The project area is assigned S-88 Zoning, and is governed by the East Otay Mesa Business Park Specific Plan. The Specific Plan further designates the site as Technology Business Park. The Technology Business Park Land Use Designation is intended for development of manufacturing options and business offices that research, develop, and produce advanced technologies.
In order to establish consistency with the County’s General Plan and the East Otay Mesa Business Park Specific Plan, the project would create three new Specific Plan Designations allowing for a mix of residential, employment, and retail uses: Mixed-Use Residential Emphasis; Mixed-Use Employment Emphasis; and Mixed-Use Retail Emphasis. These new designations are consistent with the General Plan’s Thriving Communities goals. The project would include a range of densities and a mix of uses across the planning area as indicated by the new designations and is anticipated to create a catalyst for development within East Otay Mesa. The maximum numbers of residential units will be based upon the approved peak hour traffic volumes and is anticipated to be approximately 3,158 residential units.

1.2 PROJECT LOCATION

The project site is located generally at the northeastern corner of Otay Mesa Road and Harvest Road/SR-125 in the Otay Community Planning area, within unincorporated San Diego County. The project area is depicted on the Otay Mesa 7.5-minute USGS topographic quadrangle with Sections 25 and 26 of Township 18 South, Range 1 West (Figures 1, 2, 3, and 4). The site includes nine individual parcels with the following Assessor’s Parcel Numbers (APNs): 646-240-30, 646-310-17, 646-080-26, -27, -28, -29, -31, -32, and -33.

1.3 EXISTING CONDITIONS

The Project area lies within a rich natural and cultural environment. The existing environmental and cultural settings are described below.

1.3.1 Environmental Setting

Natural Setting

This natural setting discussion was prepared by Gallegos in 2008. The project area landform is a relatively flat mesa top that includes a large knoll or ridgeline that is a remnant Pleistocene terrace. This ridgeline dominates the central portion of the project area. Areas surrounding the Pleistocene terrace include gently sloping areas away from the ridgeline, a ridgeline south of Johnson Canyon, and steep slopes leading into Johnson Canyon. Vegetation on the mesa, as well as areas located adjacent to or within canyons, includes coastal and inland sage scrub, chaparral, and grassland communities.

A geologic study for the project area was completed by GEOCON (1990). Only those portions of the geologic report that directly relate to this study are provided below. The following paragraphs were, for the most part, taken verbatim from GEOCON (1990). Three surface soil types and three geologic formational units were encountered during the GEOCON investigation. These are topsoils, alluvium, colluvium, fluvial terrace deposits, sediments of the Otay Formation, and hard metavolcanic rocks of the Santiago Peak volcanics. Each of these units is described below.

Topsoil

Loose organic and/or clayey topsoils overlie the majority of the site and have a generally uniform thickness of 2 to 3 feet. Topsoils are both cultivated and uncultivated, silty to sandy clays and clayey sands. The topsoils are potentially compressible or highly expansive. In the north-central portion of the property where the mound and swale topography occurs, topsoil thickness is greater and may vary by 2 to 3 feet over distances of 15 to 20 feet.
1.0 Introduction

Figure 1. Project vicinity.
1.0 Introduction

Figure 2. Project location.
Figure 3. Project design.
Figure 4. Project’s tentative map.
Alluvium (Qal)
Alluvial soils composed primarily of silty and clayey sands, occur at the bottom of shallow ravines that cross the property. Thick alluvial deposits are likely to be present along the bottom of Johnson Canyon where they may exceed 15 feet in depth.

Colluvium (Qc)
Colluvial deposits develop on hillside terrain as a result of slow downslope movement of soil particles and rock fragments. Locally, the alluvial and colluvial deposits are undifferentiated.

Fluvial Terrace Deposits (Qt)
Fluvial terrace deposits are very dense, weakly-cemented to cohesionless sands, cobbles, and boulders (in excess of 3 feet) that cap the top of the broad knoll in the central portion of the property and the southwestern corner of the site. Metavolcanic rock clasts are abundant and indicate that the terrace deposits probably originated from the nearby Otay Mountains. These deposits provided nodule (cobble to boulder-size rocks) materials for lithic tools.

Otay Formation (To)
The Oligocene Otay Formation consists of very dense, light gray-brown to light brown, silty to clayey sandstones and hard, sandy claystones and siltstones. The sandy and clayey units vary in thickness and are typically interbedded. The sandier portions of the Otay Formation are considered to have “very low” to “low” expansive potential, whereas the clayey portions are medium to high in expansive potential. Two bentonite clay seams, with critically high expansive potential were also encountered.

Santiago Peak Volcanics (Jsp)
The Santiago Peak Volcanics consist primarily of weakly metamorphosed volcanic flow rocks and related breccias. Metavolcanic rocks were encountered near the bottom of Johnson Canyon in the northeastern corner of the project area. Metavolcanic rocks were favored by precontact inhabitants as raw material for lithic tool manufacture.

In summary, the project area includes topsoil, alluvium (Qal), colluvium (Qc), fluvial terrace deposits (Qt), Otay Formation (To), and Santiago Peak Volcanics (Jsp). For the most part, the project area can be generally described as a fluvial terrace deposit, in the central area, surrounded and underlain by the Otay Formation. Alluvium and colluvium overlie the Otay Formation outside of the central area. Alluvial deposits and Santiago Peak volcanics can be found in Johnson Canyon in the northeastern corner of the project area.

Disturbance includes a borrow pit in the central area, dirt roads, and agricultural activity. Otay Mesa, in general, and the Otay Tech Centre project area specifically, has been disturbed by agricultural activities over the past 100 years.

During ASM’s 2016 site visit, it was found that recent rains had resulted in a profusion of dense grasses, wild mustard, and other non-native weeds covering 95 percent of the Project area ground surface, not including graded roads. Several willow trees are located in the southeast corner of the Project area. The graded dirt Harvest Road bisects the Project area from north to south and is well-maintained with large earthen windrows on each side from consistent maintenance and heavy traffic. Numerous lithic artifacts were observed within these windrows during the current survey. A large circular area was cleared on the east side of Harvest Road, just north of Otay Mesa Road. No artifacts were observed within this disturbed area. Although the Project area has been designated as an off-highway vehicle (OHV) area for approximately 20 years with several new dirt roads appearing during that time, most of the area is relatively...
free of modern refuse, although several concentrations exist, notably around the OHV roads in the Project’s proposed Open Space area.

**Cultural and Historical Setting**

Archaeological investigations in San Diego County and elsewhere in southern California have documented a diverse range of prehistoric human occupations, extending from the terminal Pleistocene down to the time of European contact (Erlandson and Colten 1991; Erlandson and Glassow 1997; Erlandson and Jones 2002; Jones 1992; Jones and Klar 2007; Moratto 1984). Different regional chronologies, often with overlapping and inconsistent terminologies, have been used in coastal southern California. Three general periods can conveniently be distinguished: the Paleo-Indian period during the Pleistocene/Early Holocene, the Archaic period during the Middle Holocene, and the Late Prehistoric period during the Late Holocene. These periods are characterized by changing patterns in material culture that are thought to represent distinct regional trends in the economic and social organization of prehistoric groups.

**Early Man: Human Occupation Prior to 13,500 B.P.**

The antiquity of human occupation in the New World has been the subject of considerable debate over the last few decades, and a number of sites have been proposed as representing very early occupation of the Americas (Owen 1984; Taylor 1991). The most widely accepted model is that humans first entered North America between 15,000 B.P. and 12,000 B.P.; no sites are reliably dated prior to 15,000 B.P. (e.g., Haynes 1969; Jelinek 1992; Meltzer 1993). Several notable Early Man sites have been reported in San Diego County, but these locations have problems with context and provenience. Many reported Early Man sites are surface scatters of “ancient” tools, or are cobble tools extracted from geological contexts. Radiocarbon dates that supported Early Man presence in the region have been corrected with improvements in technology, with the result that these dates are now proven to be much more recent (Bada 1985). The reported presence of Early Man in San Diego remains controversial.

**Paleo-Indian Period (11,500 - 8500/7500 B.P.)**

The Paleo-Indian period begins with Clovis occupation, a widespread phenomenon in North America. Noted for its distinctive tool kit characterized by fluted points, Clovis occupation dates to the end of the Pleistocene, from 11,200 to 10,600 B.P. (Meltzer 1993). The Paleo-Indian period in San Diego County is considered to date to the terminal Pleistocene and the early Holocene, from ca. 11,500 to 8500/7500 B.P. (Moratto 1984; Warren et al. 2008).

Much has been written about Paleo-Indian assemblages in the southern California region, and a variety of terms have been proposed. Rogers, the first to temporally order the archaeological assemblages of the region, introduced and then discarded the terms Scraper-Makers, Malpais, and Playa to label early lithic industries of the region (see Warren 1967 for a comprehensive review). Rogers (1939, 1945) coined the term San Dieguito to refer to early artifact assemblages in San Diego County. Rogers’ (1929) use of the term San Dieguito developed out of pioneering survey work during which he identified lithic scatters situated on the San Dieguito plateau of San Diego County. These sites were initially termed the Scraper-Maker occupation areas. Key attributes of these Scraper-Maker sites included patinated scrapers, knives, rare crescentic stones, and occasional manos and metates. These sites, situated on terraces and ridge tops, lacked substantial midden deposits and were interpreted as evidence of a hunting-focused culture.

The relationship between San Dieguito and later La Jolla sites has been the subject of considerable debate (Bull 1981, 1987; Gallegos 1987a, 1987b; Moriarty 1969; Warren 1985, 1987; Warren et al. 2008). The key issues concern whether San Dieguito sites are chronologically earlier than La Jolla (Archaic) sites, whether early sites lack ground stone artifacts, and whether subsequent Archaic sites include substantial bifacial tool assemblages. A major alternative interpretation considers San Dieguito and La Jollan sites as...
simply functional variants of a single culture, with so-called San Dieguito sites representing specialized quarrying or hunting activities (Bull 1987; Gallegos 1987b).

**Archaic Period (8500 - 1300/800 B.P.)**

The Archaic period is considered to have extended from 8500 B.P., and possibly as early as 9000 B.P., until 1300/800 B.P. (Moratto 1984; Warren et al. 2008). This time period is differentiated from the Paleo-Indian cultural complex based on a later focus on activities that emphasized marine mollusks, fish, and plant resources.

Some archaeologists have identified a distinction between shell-midden Archaic sites (near the coast) and non-shell-midden Archaic sites further inland. Coastal Archaic sites (often termed the La Jolla complex) are characterized by shell middens, flaked cobble tools, basin metates, manos, and discoidal stone artifacts. Inland Archaic adaptations are not well understood. Initially, a series of 25 sites predating the Late Prehistoric period in inland northern San Diego County were termed the Pauuma complex by True (1958). These sites were set on hills overlooking drainages. They were considered distinct from coastal Archaic sites because they lacked shellfish remains and bone. The economy at these sites was interpreted as oriented toward seed gathering, given the predominance of grinding stones in the tool assemblages. True (1958) initially hypothesized that they may have similarities with San Dieguito (Paleo-Indian) sites, based on the presence of bifaces, crescentsics, and projectile points. A significant result of True’s reconsideration of the Pauuma complex, based on materials from the Pankey site (SDI-682) and other sites, was the differentiation between Pauuma complex and San Dieguito complex sites (True 1980:34-37). He pointed out, elaborating on his earlier study (True 1958), that Pauuma sites contain the following attributes: crescents, leaf-shaped points, felsite chipping waste, shallow cultural deposits, and site locations on knolls or hills that are currently not near water sources. No pottery, bedrock milling, or developed midden are present at Pauuma complex sites. He further added that the Pauuma complex appeared to be affiliated with the coastal La Jollan complex, and had little evidence of San Dieguito cultural components (True 1980:37).

A focus of True’s ongoing research over the next several years was evaluating whether the Pauuma complex is an inland manifestation of the coastal La Jolla complex. While it might seem obvious that Archaic use of a major drainage would have been extended from the coast to the inland areas, there continues to be little chronological evidence for inland occupation as early as sites occupied on the coast. Previous work on Pauuma complex sites had suggested that interior Early Milling/Archaic occupations were much later than Early Milling/Archaic occupation along the coast (ca. 2500 B.P. vs. 5000-7000 B.P.).

Differentiating between Archaic-period coastal and inland sites is an ongoing research issue. Are the differences cultural, or based on resource exploitation and the environment? Research on Camp Pendleton indicates a continuity in Archaic-type occupation of the coastal area from 8000 B.P. into the Late Prehistoric period. These results differ from the classic interpretation of San Diego’s culture history but are in line with current thinking that seasonal and environmental adaptations, rather than temporal or cultural differences, result in differences in site constituents (Byrd 1996a, 1996b; Byrd et al. 1995). Additional research is needed on this topic.

**Late Prehistoric Period (1300/800 - 200 B.P.)**

The onset of the Late Prehistoric period in San Diego County is generally considered to have occurred between 1300 and 800 B.P. (Moratto 1984; Rogers 1945; Warren et al. 2008). The timing of this period may have varied within the region (potentially earlier in the east and later in the west). In general, the Late Prehistoric period is characterized by the appearance of small, pressure-flaked projectile points indicative of bow-and-arrow technology, the appearance of ceramics, the replacement of flexed inhumations with cremations, and an emphasis on inland plant food collection and processing (especially of acorns) (Meighan 1954; Rogers 1945; Warren 1964, 1968).
1.0 Introduction

The explanations for the origin of the Late Prehistoric period are problematic and subject to differing interpretations (Meighan 1954; Moriarty 1966; Rogers 1945; True 1966). Kroeber (1970:578) speculated that Shoshonean speakers migrated from the deserts to the southern coast of California at least 1,000-1,500 years ago. Some subsequent investigators have embraced this hypothesis and correlated it with the origins of the Late Prehistoric period (Meighan 1954; Warren 1968).

The Late Prehistoric period in southern San Diego county was first described by Rogers (1945), based on over 25 years of investigations in San Diego and Imperial counties. In his key study (Rogers 1945), he described the Yuman cultural sequence, its traits, and the geographic range of its people. Rogers defined the Yuman people as having come from, or possessing cultural traits derived from, the Colorado River area. The Yuman culture developed into the Diegueño culture during the ethnohistoric period.

Differentiation between the Yuman culture and its predecessors has been made primarily on the basis of the presence of ceramics. However, Rogers (1945:172-173) discussed a preceramic or aceramic Yuman phase, which would be nearly impossible to distinguish from earlier cultures. Rogers divided the Yuman period into Yuman I (A.D. 900-1050), Yuman II (A.D. 1050-1500), and Yuman III (A.D. 1500-contact). He based this chronology on ceramic types, associated nonlocal artifacts, and the final stand of Lake Cahuilla.

Rogers identified the Yuman I period primarily along the Colorado River, the area of origin for the culture. At this time, Lake Cahuilla was not filled. The final drying of Lake Cahuilla marked the end of the Yuman II phase. Late Prehistoric sites are characterized in general by the introduction of the bow and arrow (with the presence of Cottonwood Triangular and Desert Side-notched points), the use of obsidian from Obsidian Butte, and mortars for processing plant foods. In addition, cremation was practiced during the Late Prehistoric period.

Subsequently, the Yuman culture area has been redefined as Patayan, to eliminate confusion with the Yuman linguistic family. Patayan ceramics have been studied extensively in an effort to create a typology that can be used to establish a cultural chronology: Patayan I is defined as A.D. 600-1000, Patayan II as A.D. 1000-1500, and Patayan III as A.D. 1500-1769. These phases are similar to the Yuman I/II/III phases defined by Rogers but have been refined by recent studies (Hildebrand et al. 2002). Typically, Tizon Brown Ware ceramics are associated with coastal sites, while Lower Colorado Buff Ware is found in desert sites.

**Ethnographic Setting**

The people living in the southern part of San Diego County at the time of Spanish contact were called the Diegueño, after the mission at San Diego. However, as Hedges (1975:80) pointed out, many of the people living in the region were not affiliated specifically with the mission. In general, the term Kumeyaay has come into common usage to identify the Yuman-speaking people living in the central and southern part of the county and northwestern Baja California. Luomala (1978) uses the terms Tipai and Ipai to refer to the southern and northern Kumeyaay, respectively. The dividing line between the Tipai and the Ipai is approximately Point Loma to Cuyamaca Peak and Julian. The name Kamia has been used by anthropologists to refer to the Yuman-speaking people living in Imperial Valley.

The Kumeyaay people established a rich cultural heritage that was described in detail by Waterman (1910), Spier (1923), Hohenthal (2001), and others. The people were organized into communities, each having base camps and an extensive territory exploited for specific resources. Based on ethnohistoric and ethnographic information, a large number of village sites have been identified throughout San Diego County, including the ethnohistoric village of ‘Utay (Otat) approximately 2.5 miles (mi.) north of the Project area. Many of these villages were located along the coast, near river mouths; the varied environments offered by the ocean...
and riparian areas attracted large numbers of people to these areas (although a study by Christenson [1992] indicated that maritime resources were not as large a part of the diet as previously believed).

Examples of baskets and pottery from the nineteenth and early twentieth centuries indicate a high level of artistic achievement and craftsmanship. Many different types of stone material were used for manufacturing tools, and exotic types were procured from other parts of the region. The remains of structures that were built at village sites can be seen in the archaeological record as stone foundations and circles. Many traditional culturally sacred areas were recognized by the Kumeyaay, and these locations continue to be held as sacred today.

The diet of the Kumeyaay included both plant and animal foods. There was considerable seasonality in the relative importance of plant versus animal food, and also the types of plant and animal foods. Nutritionally, the plant foods were high in fat, carbohydrates, and protein, and thus provided a high-energy diet. Some of the plants exploited for food included acorns, annual grass seeds, yucca, manzanita, sage, sunflowers, lemonade berry, chia, and various wild greens and fruits. None of these plants are available throughout the year; instead, they were only seasonally available. For example, elderberries are available during July and August, chia seeds are available mainly in June, acorns in the fall only, and many grasses are summer and fall resources. Of course, if these resources were stored, they could be consumed throughout the year.

Given the general ethnohistoric accounts of the Kumeyaay, groups residing along the Otay River and its tributaries could have utilized several ecological niches varying by altitude. During early and mid-summer, subsistence activities could have focused on staple seed-bearing plants. Grasses would have been available in the coastal terraces, large inland valleys, and open upland settings. Important plant resources such as elderberry, chia, and manzanita were collected extensively during the summer months. Then settlements may have moved to the higher elevations, with the aggregation of families into larger groups for acorn harvests during the fall and winter months. Animal exploitation may have been most extensive during the months when plant resources were meager, and supplementary plant foods, including yucca and cactus, were also exploited seasonally as needed. Any coastal settlements could have supplemented these resources with shellfish and marine fish exploitation. The availability of these resources varied during the year (notably for fish) and from year to year (notably for the shellfish Donax gouldii) (Reddy 1996).

The ethnohistoric village of ‘Utay (Otay) is located near the project area. Otay is recorded as a major settlement within the larger district of Santo Domingo on the edge of Otay River, probably downstream from Otay Dam. The origin of the Kumeyaay name is uncertain, although it has been translated as a wide and level place or a brushy place (Stein 1975:94). Spanish contact with the people of Otay began at least as early as 1775, when several baptisms were performed. Over the next 43 years, 30 villagers were baptized, with the highest annual number of baptisms (three) occurring in 1797 and again in 1799. Family names associated with the village include Guesnac, Jallamac, Sinijan, and Singuatai. Otay villagers participated in the sacking of Mission San Diego de Alcalá in 1775, and three warriors were accomplices in the killing of the missionary Luis Jayme. While speculative, it appears that the archaeological work conducted by McGowan (1977; McDonald et al. 1993) was associated with the village of Otay. If this is the case, this site represents one of the few Contact-period village sites that has been tested and reported. Large, relatively intact portions of this village site may still exist (McGowan 1977; McDonald et al. 1993).

**Spanish Period**

Spanish explorer Juan Rodriguez Cabrillo first discovered California in 1542, claiming it for the King of Spain. More than two centuries later, Christian missionaries and soldiers made port and founded Mission San Diego de Alcalá in 1769, the first of 21 Spanish missions (1769-1823). Charged with converting pagan Indians to Christianity, the mission system and its soldiers would protect Spain’s interest. Soldiers protected the mission from Presidio Hill, and the Franciscans first served the new mission by overseeing its operations and assumed control over the land as a trustee for the Indians. The mission system operated under the
expectation that once the Indians had been Christianized and “civilized,” the community would become a pueblo. In 1774, the presidio became a Royal Presidio, and the mission was relocated 10 km up the San Diego River. Some Indians had already been baptized, but others revolted in 1775 by burning the mission and killing a friar. The attack did not prompt any long-term changes to the mission system, but it heightened insecurities. Indians living near the mission complex continued to work the land, slowly transforming it into orchards (citrus and olive), vineyards, farm crops, and cattle ranch land. Indians in the backcountry, however, preferred to keep their distance from the mission to resist disease and retain their way of life (Engstrand 2005:50-54; Pourade 1960:xv, 18-19, 117; Robinson 1948:23-26).

**Mexican Period**

After a long struggle in Mexico, the Mexican War of Independence ended in 1821, severing the Spanish hold on the Californias. The San Diego area began transitioning from a religious and military outpost to a town. The mission movement was dwindling, as 17 of the oldest missions no longer had resident priests and the native population had drastically declined from the impact of Spanish occupation. The Mexican government continued to open up San Diego by retracting port restrictions, further expanding access to the port for the growing hide trade. Old Town became an important center for a decade, becoming a civilian town in 1834. By 1840, the town had fallen into disrepair, and many left the old, decaying pueblo (Engstrand 2005:56-57; MacPhail 1971; Mills 1968; Padilla-Corona 1997; Pourade 1960; Robinson 1948:23-72).

Land grants or ranchos largely characterize the Mexican period (1821-1848). Although some land had been granted to Indians, most of the land went to military men or merchants. A majority of ranchos were demarcated after secularization of mission land beginning in 1833, which prompted a rush for land grants. Land granted to Mexicans in California between 1833 and 1846 amounted to 500 ranchos, primarily near the coast from San Francisco to San Diego. Hand-drawn maps or diseños indicated the often-vague boundaries of the grants where dons and doñas constructed adobe houses on their vast lands, cultivating the land and grazing cattle, often with the aid of vaqueros. Mexican Governor Pío Pico granted a great number of those ranchos prior to 1846, quickly carving up Alta California. Many of the Mexican land titles survived the U.S. victory in the Mexican-American War (1846-1848) (Christenson and Sweet 2008:7; Engstrand 2005:64-66; Robinson 1948:23-72).

**American Period**

After the Mexican-American War, land ownership in California became more complicated, despite protection under the Treaty of Guadalupe Hildalgo of February 1848. Proof of rancho land ownership under the new government often meant years of effort to obtain a federal patent, and many rancheros had difficulty maneuvering through the process. Capitalizing on the uncertainty of those transitional years, Anglo settlers increasingly squatted on land that belonged to Mexicans and began challenging the validity of Spanish-Mexican claims through the Board of Land Commissioners (1851) (Garcia 1975:15-16, 22-24). Meanwhile, William Heath Davis’ 1850 experiment to restart San Diego as a coastal New Town failed after a short period of time. Alonzo E. Horton’s attempt at New Town in 1867 became the successful foundation for present-day downtown San Diego (MacPhail 1971; Mills 1968; Padilla-Corona 1997). An influx of Anglo squatters outside of New Town and new government taxes severely hindered Californio rancho owners, and by 1860, most did not retain their original land holdings. Unimproved farmland and substantial, often unconfirmed, ranchos characterized the largely uninhabited San Diego County (Garcia 1975:15-16, 22-24).

The confirmation of ranchos’ boundaries in the late 1860s and early 1870s drew additional settlers as land became officially conveyable. Small farming communities were quickly established throughout San Diego County, and a completed second transcontinental railroad in November 1885 helped to initiate an unprecedented real estate boom for New Town that spilled over the county. Settlers poured into San Diego, lured by real estate promotions offering a salubrious climate, cheap land, and the potential to realize great profits in agriculture and real estate. Speculators formed land companies and subdivided town sites.
Throughout the county, and settlers took up homestead claims on government land for both speculation and permanent settlement (Pourade 1964:167-191).

During the 1880s, many small towns were created in the south bay area in an attempt by real estate speculators to entice people to settle in this area (Painter 1985). Some of these towns still exist, while others have been absorbed into larger cities. The lack of water in the Otay Mesa area prohibited large-scale development during the late nineteenth and early twentieth centuries. Although land developers promoted the construction of an irrigation system, it was never developed. The 1880s were unusually wet years in Otay Mesa; however, water was still scarce, and was procured through hand-dug wells and cisterns, or hauled in from Otay Valley. Otay Mesa housed 40 families in 1887, primarily subsisting on small-scale homesteads. A subsequent drought through the 1930s further restricted agricultural growth on Otay Mesa (Robbins-Wade and Van Wormer 1999; Van Wormer 1987). The region remained rural, subsisting on dry-farming techniques that produced wheat, barley, corn, peaches, apricots, grapes, potatoes, beans, and peas (San Diego Archaeological Center n.d.). Dry farming took place within the Project area through the 1990s.

During the boom period of the late 1800s, promoters described Otay as a place with water and abundant opportunities for farming and settling. By 1892, the Otay Irrigation District was formed, with the Otay River running through the middle of the district. The town site of Otay was established in 1887 (Stein 1975:94). The National City and Otay Railroad was organized in 1886 (Hanft 1984:13) and ran north-to-south through the area in 1888 (Anonymous 1888:683). The population in 1892 was given as 350, with 300 acres devoted to fruit, consisting of grapes, apricots, peaches, apples, pears, prunes, figs, oranges, lemons, and guavas, and nearly 150 acres of farm land yielding other produce (San Diego Union 1 January 1892: Part II, page 10).

In An Illustrated History of Southern California, published in 1890 by Lewis Publishing Company as a promotional piece, Otay was said to mean “wide, level knoll” in the local Indian language. This publication stated that the valley was used for fruit orchards and gardens, all of which were irrigated by wells or an irrigation system powered by windmills. The article on Otay noted that 90,000 gallons of wine were produced, as well as hay. Otay was described as “rich garden land.”

By 1896, a dam had been built across Otay River to provide irrigation for the mesa (CSRI 1982:31). By the time the dam was completed, early settlers had built ranches and farms in the region (Button 1949). After the land boom of the late 1800s, the next notable event in the Otay Mesa region was the flood of 1916. A severe drought took place on the Otay Mesa during the beginning of the twentieth century, and agriculture in the region was severely affected. In 1916, the City of San Diego hired the infamous rainmaker Charles Hatfield to end the drought (San Diego Archaeological Center n.d.). A large flood ensued, and the Lower Otay Dam burst, washing out the entire valley. Much of the development in the area was washed away.

The first two decades of the twentieth century brought both continuity and change to San Diego with a growing U.S. Navy and Army presence (Heilbron 1936:370, 431; U.S. Census Bureau 1920:82). Automobiles became increasingly popular as they became affordable, prompting San Diego County to grade roads to open up the backcountry (Etulain and Malone 1989:40; Kyvig 2004:27). Glenn H. Curtiss flew the first seaplane from North Island (1911), initiating a growing interest in aviation technologies in San Diego that would later be heightened by Charles Lindbergh’s historic 1927 flight of the Spirit of St. Louis from Rockwell Field in San Diego to St. Louis, Missouri. Previously, in 1883, John Joseph Montgomery made the first manned heavier-than-air glider flight in the U.S., two decades before the Wright Brothers, in the vicinity of the Project area in Otay Mesa. A memorial to Montgomery (California Historical Landmark No. 711) was created within the Otay Mesa community (California State Parks 1996). In 1917, the U.S. Army established Camp Kearney as part of the nationwide defense campaign for World War I (Engstrand 2005). Brown Air Field, 1.5 mi. east of the Project area, was opened by the U.S. Army as East...
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Air Field in 1918, along with a U.S. Army aerial gunnery and aerobatics school. The U.S. Navy and the City of San Diego have subsequently owned the airfield, which is still in use today (City of San Diego n.d.).

San Diego County’s greatest period of population growth in the first half of the twentieth century was between 1940 and 1950, when the county grew to 556,808 (U.S. Census Bureau 1940, 1950). It is also a period characterized by more people moving to rural areas instead of the city as rural population increased by 170.8 percent (U.S. Census Bureau 1950:5-12, 5-16, 5-21). At more than half a million people, San Diego had become a metropolis with attractive rural areas transitioning into new suburban communities. Yet the population of the county remained largely concentrated in and around the city of San Diego (Day and Zimmerman Report 1945:87-90).

Much of the Otay Mesa region remained sparsely inhabited and largely agricultural until it was annexed by San Diego in 1957. Residential development grew, and in 1985 Otay Mesa was established as residential and commercial community. The Otay Mesa Port of Entry, constructed in 1985 to accommodate vehicle traffic between the U.S. and Mexico, greatly increased commercial and industrial business development on the mesa. Additional improvements to the Otay Mesa Port of Entry, through 2007, caused it to become the largest commercial crossing from California to Mexico (Daily Transcript 2010).

Historical Overview of Otay Mesa

The following section is taken from the Gallegos 2008 report and was prepared by Stephen Van Wormer.

Since the late 1880s, farmers in Otay Mesa have cultivated portions of the project area. The individual farmsteads on the mesa made up a rural community centered around Alta School. These kinds of settlements were the most prevalent type of community in San Diego County during that period.

Development of Otay Mesa during the late nineteenth century was typical of most non-urbanized portions of San Diego County west of the peninsular range. Otay Mesa became the location of a farming community consisting of about 140 individuals tied together through geographical boundaries, a common schoolhouse, and a church. Farmers living in small rural communities were instrumental in the development of San Diego County. They fed the growing urban population and provided business for local markets.

Following the Civil War, acquisition of 160 acres of land to farm became the dream and goal of thousands of young men and women in the United States, as well as numerous European immigrants. They wanted to establish a home and earn a living, or benefit from rising land values that could be anticipated with increased settlement (Fite 1976). Pioneer farmers intended to establish agricultural communities patterned after those they had left in the east. These consisted of small towns and villages that provided at least minimal services for the surrounding farmsteads, which averaged from five to eight per square mile (Kiefer 1972).

The settlement of Otay Mesa by pioneer farmers occurred in the 1880s. In 1885, four families lived on the mesa. By 1887, 40 households resided there, constituting a community of 140 individuals including 25 school-age children. The settlement consisted of “…comfortable looking farmhouses and well defined barns.” The size of farms ranged from around 160 acres to 320 acres (San Diego Union 1/6/1886:3, 1/15/1887:3, 1/1/1892:10).

By 1890, Otay Mesa was recognized as an established community with its own school, church, store, post office, and blacksmith shop. These developments occurred through mutual cooperation between farming families to solve common problems and achieve common goals. The first formal social institution established by pioneer farming communities was a school (Fuller 1981; Van Wormer 1986). Otay Mesa residents organized and established the Alta School District in January 1886 (San Diego Union 1/6/1886:3). The schoolhouse was located in the center of Otay Mesa approximately 2 mi. northwest of the Project area.
In addition to the school, Otay Mesa’s German Lutherans built their own church in 1889. Known as St. John’s Lutheran Church, the building was located 0.5 mi. west of the school. Construction began in September and was completed by October when the building was dedicated (Otay Press 10/3/1889:3, 10/10/1889:3). The local paper announced “Otay Mesa has a German Lutheran Church service every Sabbath in the new church at 11:A.M. There will be regular preaching at the Mesa (Alta) School house twice a month by Reverend I. Goodall of National City” (Otay Press 11/28/1889:3).

The first two decades of the twentieth century saw a period of drought that brought hardship to Otay Mesa farmers and a gradual decline of the community that is reflected in Alta School census records. In 1893, 20 households had children attending the school. By 1899, the number had risen to 27 households (Alta School Census 1893, 1899). An extremely dry weather cycle had begun in 1897 and continued until 1905 (San Diego Union 12/10/1900:6; Lummis 1905). In 1900, the number of households with school-age children dropped to eight. The following year, it had risen to 11, but never returned to the high numbers of the previous decade. In 1910, only nine families sent children to Alta School (Alta School Census 1900, 1901, 1910). Another dry cycle occurred during the early 1900s, and even more farming families gave up and left Otay Mesa (Piper 1986). The families that remained often sought outside work to supplement their income. Many found jobs at Hotel Del Coronado (San Diego Union 7/14/1974). During the decade of the 1920s, a nationwide agricultural depression brought hard times for all San Diego County farmers that became even worse with the Great Depression of the 1930s. These years of economic hardship saw an almost complete disappearance of the rural farm schoolhouse communities in the County (Van Wormer 1986). One of the few to survive was the Alta School District community in Otay Mesa. Following World War II, at least 16 families lived on the mesa including the Pipers (two households), Wetmores, Lohmans, Kueblers, Beckleys (two households), Rolls, Wolfs, Shaws, Petersons, Wrucks, Dallatts, McCowns, and Blalocks (Blalock 2005; McCown 2005; Painter 1985).

The Alta School House remained the center of the community. Otay Mesa families still served on the school board and sent their children to the school. The building also continued to be used for a variety of social occasions including meetings, dances, Fourth of July, May Day, and Christmas celebrations. The Otay Mesa Community Club sponsored many of these events. During the 1930s, this organization built its own clubhouse on the south side of Otay Mesa Road, across from the schoolhouse. Following its completion, the meetings and celebrations formerly attended at the school were held at the clubhouse. Fourth of July parties included horse races, tug-of-wars, and lots of food. At Christmas, Florence Beckley, the teacher at Alta School during this period, led the school children in a program at the clubhouse presented for all the families on the mesa. Alta School continued to serve families in Otay Mesa until 1957 when it closed. Primary school-age children were then bussed to Sunset and later Beyer Schools in San Ysidro. The clubhouse was used until the mid-1960s when it was torn down (Blalock 2005; McCown 2005).

There was no mail delivery in Otay Mesa during the late 1940s. Families had mailboxes along Otay Valley Road at the east end of Otay Valley. Agnes McCown (a niece of William and Peter Beckley), who had moved to the mesa in 1947 with her husband Richard, negotiated with the U.S. Postal Service to get mail delivered to Otay Mesa. Prior to this time, the roads on the mesa had no official designations. A meeting was held at the community clubhouse to name the roads so that addresses could be assigned for mail delivery. Each household designated the name for the roads on or near where they lived. Mrs. Shaw chose the name Lone Star. Mrs. Dallatt named Cactus Road after a cactus garden at her home. The Kueblers named Alta Road. The McCowns designated Heritage Road, Pete Beckley chose Siempreviva, and the Rolls named Airway Road (McCown 2005).

Hay and grain remained the staple crops on the mesa during the first half of the twentieth century. By the 1920s, tractors and trucks had replaced horse and steam power, but the annual harvest still remained a major task. Following the introduction of the combine after World War II, two men could conduct the entire harvest for a single farm. In 1960, 6,000 acres of barley were harvested in Otay Mesa. The Rolls harvested
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75 tons, which was considered to be a poor year’s yield. Sheep were brought to the mesa each summer to graze on the barley stubble that remained after the crop had been gathered (San Diego Union 8/7/1960:51, 1-8).

In the 1960s, the Otay Municipal Water District brought a dependable water supply for irrigation to the mesa (Painter 1985). This resulted in a change in the types of crops grown there. Tomatoes became the dominant product. Other vegetables such as cucumbers, bell peppers, and celery were also grown. Hay and grain continued to remain important, especially on the east half of the mesa. The arrival of a dependable water supply also brought development. Change occurred slowly, and the mesa remained a place of open fields through the mid-1970s. With the establishment of the second international border crossing in the spring of 1985, development accelerated with road improvements and construction of housing tracts and commercial and industrial complexes. Some areas are still farmed, especially on the eastern edge of the mesa along Alta Road and at the Martinez Farms on Cactus Road. However, these parcels are also slated for development and soon over 120 years of farming on the mesa will come to an end.

1.4 RECORD SEARCH RESULTS

Gallegos performed a record search at the SCIC and the Gallegos library in 2008. ASM updated the record search at the SCIC for the Project area and a 1-mi. radius around it in March of 2016.

1.4.1 Previous Studies

Gallegos reported that 90 cultural resource studies had been previously conducted for the Project area with an unknown record search radius. The 2016 SCIC results reported that 133 cultural resource studies have been conducted within the Project area and the 1-mi. search radius (Table 1); 30 of the previous studies addressed the Project area directly. The entire Project area has been previously inventoried for cultural resources. The record search confirmation is included in Appendix A.

Table 1. Previous Cultural Resources Reports Addressing the Project Area and 1-mi. Record Search Radius

<table>
<thead>
<tr>
<th>NADB No.</th>
<th>Authors</th>
<th>Date</th>
<th>Title</th>
<th>Relation to Project Area</th>
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<tr>
<td>SD-00150</td>
<td>Berryman, Stanley R.</td>
<td>1976</td>
<td>Biological and Archaeological Survey, Tentative Parcel Map 12400, Otay Mesa</td>
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<tr>
<td>SD-00414</td>
<td>Carrico, Richard</td>
<td>1974</td>
<td>Archaeological Survey of the Proposed Otay Mesa International Border Crossing</td>
<td>Intersect</td>
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<tr>
<td>SD-00518</td>
<td>Cupples, Sue Ann, and Janet P. Eidsness</td>
<td>1978</td>
<td>Archaeological Survey, Testing, and Surface Collection at SD1-5352: Westmore Lot Split Otay Mesa, California TPM 14166 Log #77-19-89</td>
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<tr>
<td>SD-01018</td>
<td>Gallegos, Dennis</td>
<td>1987</td>
<td>Cultural Resource Survey of the Straza Property, Otay Mesa, California</td>
<td>Outside</td>
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<tr>
<td>SD-01111</td>
<td>Hector, Susan</td>
<td>1983</td>
<td>Report on the Excavation of SD1-9098 and SD1-9099, Located on Otay Mesa near the International Border</td>
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<tr>
<td>SD-01364</td>
<td>Rosen, Martin D.</td>
<td>1990</td>
<td>Archaeological Survey Report for Proposed State Route 125 from State Route 905 (near the Second Border Crossing) to State Route 54 (near the Sweetwater Reservoir), San Diego County, California</td>
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<td>SD-01501</td>
<td>Wade, Sue A.</td>
<td>1985</td>
<td>Archaeological Survey of the Proposed SDG&amp;E Border Substation Property</td>
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<td>SD-01526</td>
<td>Thesken, Jay, and Richard L. Carrico</td>
<td>1982</td>
<td>Archaeological Survey of the Proposed Otay Mesa Correctional Facility</td>
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<tr>
<td>SD-01619</td>
<td>WESTEC Services, Inc.</td>
<td>1979</td>
<td>Proponents Environmental Assessment Miguel to Tijuana Interconnection Project 230 KV Transmission Line</td>
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<tr>
<td>SD-01842</td>
<td>Cheever, Dayle, and Dennis Gallegos</td>
<td>1986</td>
<td>Cultural Resource Survey for Gr-Otay, Otay Mesa, San Diego, California</td>
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<tr>
<td>SD-01865</td>
<td>Hector, Susan</td>
<td>1987</td>
<td>Cultural Resources for Airway International Business Park</td>
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<td>SD-01867</td>
<td>Hector, Susan</td>
<td>1987</td>
<td>Archaeological Investigations on Alta Road County of San Diego</td>
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<tr>
<td>SD-02047</td>
<td>Hargrove, James</td>
<td>1985</td>
<td>Reviewers of the Otay Mesa Prison Sewer Pipeline Negative Declaration</td>
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<tr>
<td>SD-02067</td>
<td>City of San Diego</td>
<td>1981</td>
<td>Draft Environmental Impact Report Brown Field Master Plan &amp; Comprehensive Land Use Plan</td>
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<td>SD-02115</td>
<td>Xinos Enterprises</td>
<td>1988</td>
<td>Extended Environmental Initial Study for Bradley Auto Storage Auction Pool P88-020 Log# 88-19-14</td>
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<td>SD-02142</td>
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<td>SD-02440</td>
<td>TMI Environmental Services</td>
<td>1990</td>
<td>Draft Supplemental Environmental Impact Report for American International Raceway</td>
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<td>SD-02482</td>
<td>Gallegos, Dennis, and Carolyn Kyle</td>
<td>1992</td>
<td>Archaeological Testing for Sites CA-SDI-10067, CA-SDI-12880, and CA-SDI-12881 Located within Parcel No.646-130-42 Otay Mesa</td>
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<td>Gallegos, Dennis, and Carolyn Kyle</td>
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<td>SD-02486</td>
<td>Gallegos, Dennis, and Carolyn Kyle</td>
<td>1992</td>
<td>Archaeological Testing for a Portion of CA-SDI-5352 Located within the Struthers Trust #3 Parcel – Otay Mesa</td>
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<tr>
<td>SD-02537</td>
<td>Gallegos, Dennis</td>
<td>1992</td>
<td>Historical/Archaeological Survey and Test of Site CA-SDI-10218 Locus B for the Loma-Soreno Partnership</td>
<td>Intersect</td>
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<td>SD-02695</td>
<td>Gallegos, Dennis, and Carolyn Kyle</td>
<td>1992</td>
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1.4.2 Previously Recorded Cultural Resources

The Gallegos 2008 report stated that three cultural resources, SDI-9975, SDI-12337, and SDI-12730, had been previously recorded within the Project area, and that SDI-12337 consisted of the combination of seven total sites, SDI-5352, SDI-9974, SDI-10072, SDI-10735, SDI-17104, SDI-17105, and SDI-12337. In addition, a segment of P-37-31491, the historic alignment of Otay Mesa Road, is within the Project area.

In the updated record search, 114 cultural resources have been previously recorded within the study area, including the 1-mi. buffer around the Project area (Table 2). Resources that intersect the Project area are described in more detail below.

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SDI-9975

The Gallegos 2008 report stated that site SDI-9975 was originally recorded by Kidder et al. (1984) as a large quarry area/lithic material procurement site, measuring approximately 350 x 630 m. The site was resurveyed (Gallegos et al. 1999) and tested to determine site significance and eligibility for listing in the California Register of Historical Resources (CRHR) and the National Register of Historic Places (NRHP) (Gallegos et al. 2000). Testing included collection of surface artifacts, and excavation of 23 shovel test pits (STPs) and three 1-x-1-m test units (Gallegos et al. 2000). Total artifacts recovered from SDI-9975 included 13 cores, 5 pieces of tested raw material, 2 manos, 2 steep-edged unifacial tools, 1 thin-edged unifacial tool, and 243 debitage.

As a result of the testing program, the boundary for site SDI-9975 was redefined to primarily the north side of Johnson Canyon. The artifacts recovered represent a surface quarry site, with the exception of a ridge area, which contained the majority of formed tools, darkened soil, and one milling implement. Given good site integrity and the higher concentration of artifacts and tools recovered suggesting habitation, the ridge...
1.0 Introduction

A portion of SDI-9975 was recommended as significant and eligible for listing in the CRHR and the NRHP, outside of the current Project area. Mitigation of impacts was achieved through the completion of the data recovery program for SDI-9975 (Gallegos et al. 2003). Artifact collections, field notes, and reports for SDI-9975 are housed at the San Diego Archaeological Center (SDAC).

**SDI-12337 (combined with SDI-5352, SDI-9974, SDI-10072, SDI-10735, SDI-17104, SDI-17105)**

Gallegos’s 2008 report stated that sites SDI-12337, SDI-5352, SDI-9974, SDI-10072, SDI-10735, SDI-17104, and SDI-17105 have been combined and the combined site will be referred as SDI-12337 throughout the report. The previously conducted work at SDI-12337 is shown on Gallegos’ confidential Figures 4, 5, and 6, included here in Appendix E.

Site SDI-5352 was originally recorded by May (1977) as a 40-acre camp and lithic workshop comprising a roasting pit, retouched tools, hammerstones, cores, flakes, and scrapers. Historic glass was noted in the northwest corner of the present site boundary of SDI-12337. Cupples and Eidsness (1978) tested a 40-acre parcel within the northwest portion of SDI-5352 and identified it as not significant. They identified this portion of SDI-5352 as a disturbed site with virtually no cultural material below the surface (Cupples and Eidsness 1978). The northwest portion of the site was tested by Smith in 1989 for the Baldwin/Otay Ranch Business Park; additional survey by Rader and Mealey (1991) expanded the site boundary to the north. In 1992, Gallegos & Associates (Gallegos and Kyle 1992; Kyle and Gallegos 1992a, 1992b, 1992c, 1992d, 1992e) conducted additional survey work, expanded the site boundary, and tested six portions of the site and identified them as not significant. Testing conducted as part of the Gallegos and Kyle (1992) work included the excavation of 16 1-x1-m units and 185 STPs, primarily within the current Project area. Phase III included surface collection within Areas A, B, C, and D; and excavation of STPs and l-x1-m units within Areas B, C, and D. The surface collection for Area A, 80 x 100 m, produced 2,424 artifacts. Surface collection in Area B, 50 x 60 m, produced 1,076 artifacts, and in Area C, 420 x 420 m, surface collection produced only one surface artifact. Area B subsurface excavation of 17 STPs and one l-x1-m unit produced 24 artifacts. The 1-x1-m unit was excavated to 40 cm and produced three debitage and one core. Area C excavation of 38 STPs and one 1-x1-m unit to approximately 40 cm produced 16 debitage and one core. The surface collection of Area D, 90 x 100 m, produced 149 artifacts. The excavation of two 1-x1-m units during Phase II within Area D produced 126 debitage, 0.3 gram (g) of bone, and 0.2 g of shell.

Of the four areas tested during Phase III, Area A contained the higher density of subsurface artifacts. The site boundary for SDI-5352 was revised and enlarged as part of the Phase II testing for the Caltrans State Route 125 project (Byrd et al. 1994). Testing as part of the Caltrans State Route 125 project was conducted for the remaining portions of SDI-5352 that had not been previously evaluated. These portions of SDI-5352, presently identified as SDI-12337, were also identified as not significant (Byrd et al. 1994).

Site SDI-9974 was originally recorded by Kidder et al. in 1984 as a large, low-density lithic scatter that consisted of cores and debitage. The site area measured 25 x 400 m; however, Kidder (1984) noted that the site extended into an adjacent field west of the site. Kidder’s work included field survey, excavation of six 1-x1-m units, and radiocarbon dating (Kidder 1984). The shell radiocarbon sample produced a date of 6250 B.P. ±140 (Leach 1985). Testing as part of the Caltrans State Route 125 project was conducted for all portions of SDI-9974 that had not been previously evaluated. These portions of SDI-9974 were identified as not significant (Byrd et al. 1994). Artifacts collected as a result of Byrd et al.’s 1994 work are curated at SDAC. San Diego State University has been contacted requesting information as to the location of the Kidder (1984) collection.

SDI-10072 is recorded on the SCIC’s map. However, no site form is filed at the Center. Testing as part of the Caltrans State Route 125 project was conducted for all portions of SDI-10072 that had not been previously evaluated; as a result, the site was identified as not significant (Byrd et al. 1994). Only a small
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Sunroad-East Otay Mesa Specific Plan Amendment

portion of the northeast corner of the site, prior to it being combined into SDI-12337, is within the current Project area. Artifacts collected as a result of Byrd et al.’s 1994 work are curated at SDAC.

Site SDI-10735 was originally recorded by Cook and Elling (1987) as a dispersed scatter of debitage, lithic tools, battered implements, and cores. Testing included collection of surface artifacts and excavation of two 1-x-1-m test units; however, no subsurface component was identified (Cook 1987). Site SDI-10735 was identified as not significant (Cook 1987). Artifacts collected as a result of Cook’s 1987 work are curated at SDAC.

SDI-12337 was originally recorded by Rosen in 1989 as a large prehistoric quarrying area and an area used for extensive processing of plant resources. A large quantity of debitage, cores, flaked tools, ground stone, and shell was recorded. The site was tested by Gallegos in 1995 and the site boundary was expanded. The testing included surface collection, 20 backhoe trenches, and one 1-x-1-m excavation unit. The site was given a NRHP Status Code of 6Y2 (Found ineligible for NR, CR or Local designation through survey evaluation). A portion of the site was revisited by Robbins-Wade in 2002 and the site boundary was expanded. Robbins-Wade revisited the site again in 2006 and 2007. In the site update, she states that multiple projects have taken place over the site and all have determined that the portions of the site tested are not a significant resource and that the research potential of the site has been fulfilled through the various testing programs. The site was again revisited in 2010 by Blotner who stated that numerous artifacts were noted within and outside the mapped site boundaries, visible in the dirt access roads. The site boundaries were adjusted to include the newly identified artifacts.

SDI-17104 was originally recorded by Robbins-Wade et al. (2004a) as containing two scrapers, seven cores, and one angular debris in a 20-x-35-m area. SDI-17104 is located within the original site boundary for SDI-5352, which is located within the current site boundary of SDI-12337. As such, site SDI-17104 is actually part of previously recorded site SDI-12337 and has been identified as not significant by past evaluators (Kyle and Gallegos 1992b). Artifacts collected as a result of work completed by Kyle and Gallegos (1992b) are curated at SDAC.

SDI-17105 was originally recorded by Robbins-Wade et al. (2004b) as a lithic scatter consisting of four cores and two debitage in a 10-x-10-m area. Site SDI-17105 is located within the original site boundary for SDI-5352, which is located within the current boundary of SDI-12337. As such, site SDI-17105 is actually part of previously recorded site SDI-12337 and has been identified as not significant by past evaluators (Gallegos and Kyle 1992). Artifacts collected as a result of work completed by Gallegos and Kyle (1992) are curated at SDAC.

SDI-12730

SDI-12730 was originally recorded by Waters (1972) as SDM-W-456 at the Museum of Man. Waters (1972) described SDM-W-456 as a site on a small knoll overlooking Johnson Canyon with manos, cores, flakes, and a blade fragment. Gallegos and Kyle (1992) completed Phases I and II consisting of field survey and initial testing. Gallegos & Associates completed Phase III extended testing in response to County comments. The three phases of work were combined within one report to provide overall project continuity (Gallegos and Kyle 1992). In all, 11 STPs and two 1-x-1-m units were excavated at SDI-12730. Given the high number of subsurface artifacts recovered, depth of deposit to 80 cm, and the potential for site SDI-12730 to address important research questions, it was identified as significant under CEQA. Approximately 50 percent of SDI-12730 is within the Project area Open Space Easement per the 2008 project map. The remaining 50 percent of the site extends to the north, outside of the Project area. All artifact collections, field notes, and reports completed by Gallegos and Kyle (1992) for SDI-12730 are curated at SDAC.

SDI-20225

SDI-20225 is adjacent to the current Project area. It was recorded by Gunderman in 2010 with testing in 2011 as a multi-component site with a prehistoric lithic scatter, two historic foundations, and historic trash
scatter that included whiteware, stoneware, porcelain, other ceramics, various colored glass fragments, metal, wire and square nails, and a glass marble. During the laboratory analysis of materials recovered during testing, it was discovered that several of the lithic artifacts, including obsidian cores and flakes, chert cores, and petrified wood were manuports of exotic materials that are not normally found in collections of prehistoric sites from San Diego County.

**P-37-031491**

P-37-031491 consists of historic Otay Mesa Road alignment, a segment of which is within the Project area. It was recorded by Robbins-Wade in 2010 as a paved, undivided two-lane highway, running east-west and updated by Gunderman later in 2010 in the same condition as the previous recordation.

**Historic Structure Location**

Gallegos (2008) reported that early USGS maps (1903 Cuyamaca 30'; 1943 Jamul 15'; 1955 Jamul 15'; 1955 Otay Mesa 7.5’) were reviewed for historic structures. One structure was identified in the southeast portion of the Project area on the 1955 Otay Mesa USGS map. The historic structure was part of the Wetmore farm; additional farm buildings were recorded outside of the Project area as P-37-032163 by ASM in 2011.

### 1.5 APPLICABLE REGULATIONS

Cultural resource regulations that apply to the project area are the County of San Diego RPO, the San Diego County Local Register, CEQA, and provisions for the CRHR and Traditional Cultural Properties / Tribal Cultural Resources.

Districts, sites, buildings, structures, and objects are assigned significance based on their exceptional value or quality illustrating or interpreting the heritage of San Diego County in history, architecture, archaeology, engineering, and culture. A number of criteria are used in demonstrating resource importance.

#### 1.5.1 California Register of Historic Resources and the California Environmental Quality Act

CEQA requires that all private and public activities not specifically exempted be evaluated against the potential for environmental damage, including effects to historical resources. Historical resources are recognized as part of the environment under CEQA. The act defines historical resources as “any object, building, structure, site, area, or place that is historically significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California” (Division I, Public Resources Code, Section 5021.1[b]).

Lead agencies have a responsibility to evaluate historical resources against the CRHR criteria prior to making a finding as to a proposed project’s impacts to historical resources. Mitigation of adverse impacts is required if the proposed project will cause substantial adverse change. Substantial adverse change includes demolition, destruction, relocation, or alteration such that the significance of an historical resource would be impaired. While demolition and destruction are fairly obvious significant impacts, it is more difficult to assess when change, alteration, or relocation crosses the threshold of substantial adverse change. The CEQA Guidelines provide that a project that demolishes or alters those physical characteristics of an historical resource that convey its historical significance (i.e., its character-defining features) is considered to materially impair the resource’s significance. The CRHR is used in the consideration of historical resources relative to significance for purposes of CEQA. The CRHR includes resources listed in, or formally determined eligible for listing in, the NRHP and some California State Landmarks and Points of Historical Interest. Properties of local significance that have been designated under a local preservation ordinance (local landmarks or landmark districts), or that have been identified in a local historical resources
inventory, may be eligible for listing in the CRHR and are presumed to be significant resources for purposes of CEQA unless a preponderance of evidence indicates otherwise. Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the CRHR (PRC Section 5024.1, Title 14 CCR, Section 4852) consisting of the following:

a) it is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or

b) it is associated with the lives of persons important to local, California, or national history; or

c) it embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values; or

d) it has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

1.5.2 San Diego County Local Register of Historical Resources

The County maintains a Local Register that was modeled after the CRHR. Significance is assigned to districts, sites, buildings, structures, and objects that possess exceptional value or quality illustrating or interpreting the heritage of San Diego County in history, architecture, archaeology, engineering, or culture. Any resource that is significant at the national or state level is by definition also significant at the local level. The criteria for eligibility for the Local Register are comparable to the criteria for eligibility for the CRHR and NRHP, but significance is evaluated at the local level. Included are:

(1) resources associated with events that have made a significant contribution to the broad patterns of California or San Diego County’s history and cultural heritage;

(2) resources associated with the lives of persons important to our past, including the history of San Diego and our communities;

(3) resources that embody the distinctive characteristics of a type, period, region (San Diego County), or method of construction, or represent the work of an important creative individual, or possesses high artistic values; and

(4) resources that have yielded or are likely to yield, information important in prehistory or history.

Districts are significant resources if they are composed of integral parts of the environment that collectively (but not necessarily as individual elements) are exceptional or outstanding examples of prehistory or history.

The County also treats human remains as “highly sensitive.” They are considered significant if interred outside a formal cemetery. Avoidance is the preferred treatment.

Under County guidelines for determining significance of cultural and historical resources, any site that yields information or has the potential to yield information is considered a significant site (County of San Diego 2007a:16). Unless a resource is determined to be “not significant” based on the criteria for eligibility described above, it will be considered a significant resource. If it is agreed to forego significance testing on cultural sites, the sites will be treated as significant resources and must be preserved through project design (County of San Diego 2007a:19).
1.0 Introduction

1.5.3 County of San Diego Resource Protection Ordinance (RPO)

The County uses the CRHR criteria to evaluate the significance of cultural resources. In addition, other regulations must be considered during the evaluation of cultural resources. Specifically, the County of San Diego’s RPO defines significant prehistoric and historic sites.

The County defines a significant prehistoric or historic site under its RPO as follows:

1. any prehistoric or historic district, site, interrelated collection of features or artifacts, building, structure, or object either:
   (a) formally determined eligible or listed in the NRHP; or
   (b) to which the Historic Resource (H designator) Special Area Regulations have been applied; or

2. one-of-a-kind, locally unique, or regionally unique cultural resources which contain a significant volume and range of data or materials; and

3. any location of past or current sacred religious or ceremonial observances which is either:
   (a) protected under Public Law 95-341, the American Religious Freedom Act, or Public Resources Code Section 5097.9, such as burials, pictographs, petroglyphs, solstice observatory sites, sacred shrines, religious ground figures, or
   (b) other formally designated and recognized sites which are of ritual, ceremonial, or sacred value to any prehistoric or historic ethnic group.

1.5.4 Traditional Cultural Properties / Tribal Cultural Resources

Federal and state laws mandate that consideration be given to the concerns of contemporary Native Americans with regard to potentially ancestral human remains, associated funerary objects, and items of cultural patrimony. Consequently, an important element in assessing the significance of the study site has been to evaluate the likelihood that these classes of items are present in areas that would be affected by the proposed project.

Potentially relevant to prehistoric archaeological sites is the category termed Traditional Cultural Properties (TCP) in discussions of cultural resource management (CRM) performed under federal auspices. According to Patricia L. Parker and Thomas F. King (1998), “Traditional” in this context refers to those beliefs, customs, and practices of a living community of people that have been passed down through the generations, usually orally or through practice. The traditional cultural significance of a historic property, then, is significance derived from the role the property plays in a community's historically rooted beliefs, customs, and practices.

The County of San Diego Guidelines (2007a) identify that cultural resources can also include TCPs, such as gathering areas, landmarks, and ethnographic locations in addition to archaeological districts. These guidelines incorporate both State and Federal definitions of TCPs. Generally, a TCP may consist of a single site, or group of associated archaeological sites (district; traditional cultural landscape), or an area of cultural/ethnographic importance.

The Traditional Tribal Cultural Places Bill of 2004 requires local governments to consult with Native American representatives during the project planning process. The intent of this legislation is to encourage consultation and assist in the preservation of “Native American places of prehistoric, archaeological, cultural, spiritual, and ceremonial importance” (County of San Diego 2007a). It further allows for tribal cultural places to be included in open space planning. State Assembly Bill (AB) 52, in effect as of July 1, 2015, introduces the Tribal Cultural Resource (TCR) as a class of cultural resource and additional
1.0 Introduction

considerations relating to Native American consultation into CEQA. As a general concept, a TCR is similar to the federally-defined TCP; however, it incorporates consideration of local and state significance and required mitigation under CEQA. A TCR may be considered significant if included in a local or state register of historical resources; or determined by the lead agency to be significant pursuant to criteria set forth in PRC §5024.1; or is a geographically defined cultural landscape that meets one or more of these criteria; or is a historical resource described in PRC §21084.1, a unique archaeological resources described in PRC §21083.2, or is a non-unique archaeological resource if it conforms with the above criteria.

In 1990, the NPS and Advisory Council for Historic Preservation introduced the term ‘TCP’ through National Register Bulletin 38 (Parker and King 1998). A TCP may be considered eligible based on “its association with cultural practices or beliefs of a living community that (a) are rooted in that community’s history, and (b) are important in maintaining the continuing cultural identity of the community” (Parker and King 1998:1). Strictly speaking, Traditional Cultural Properties are both tangible and intangible; they are anchored in space by cultural values related to community-based physically defined “property referents” (Parker and King 1998:3). On the other hand, TCPs are largely ideological, a characteristic that may present substantial problems in the process of delineating specific boundaries. Such a property’s extent is based on community conceptions of how the surrounding physical landscape interacts with existing cultural values. By its nature, a TCP need only be important to community members, and not the general outside population as a whole. In this way, a TCP boundary, as described by Bulletin 38, may be defined based on viewscape, encompassing topographic features, extent of archaeological district or use area, or a community’s sense of its own geographic limits. Regardless of why a TCP is of importance to a group of people, outsider acceptance or rejection of this understanding is made inherently irrelevant by the relativistic nature of this concept.
2.0 GUIDELINES FOR DETERMINING IMPACT SIGNIFICANCE

The following guidelines are used in determining whether the proposed Project would have a significant impact.

1. The project causes a substantial adverse change in the significance of a historical resource as defined in §15064.5 of the State CEQA Guidelines. This shall include the destruction, disturbance or any alteration of characteristics or elements of a resource that cause it to be significant in a manner not consistent with the Secretary of Interior Standards.

2. The project causes a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the State CEQA Guidelines. This shall include the destruction or disturbance of an important archaeological site or any portion of an important archaeological site that contains or has the potential to contain information important to history or prehistory.

3. The project disturbs any human remains, including those interred outside of formal cemeteries.

4. The project proposes activities or uses damaging to significant cultural resources as defined by the Resource Protection Ordinance and fails to preserve those resources.

5. The project proposes activities or uses that would cause a substantial adverse change in the significance of a tribal cultural resource.

The Guidelines listed above have been selected for the following reasons:

Guidelines 1 and 2 are derived directly from CEQA. Sections 21083.2 of CEQA and 15064.5 of the State CEQA Guidelines recommend evaluating historical and archaeological resources to determine whether or not a proposed action would have a significant effect on unique historical or archaeological resources.

Guideline 3 is included because human remains must be treated with dignity and respect and CEQA requires consultation with the “Most Likely Descendant” as identified by the Native American Heritage Commission (NAHC) for any project in which human remains have been identified.

Guideline 4 was selected because the Resource Protection Ordinance requires that cultural resources be considered when assessing environmental impacts. Any project that would have an adverse impact direct, indirect, and cumulative) on significant cultural resources as defined by this Guideline would be considered a significant impact. The only exemption is scientific investigation.

All discretionary projects are required to be in conformance with applicable County standards related to cultural resources, including the noted RPO criteria on prehistoric and historic sites, as well as requirements listed in the Zoning Ordinance, General Plan, and the Grading, Clearing and Watercourses Ordinance (§87.429). Non-compliance would result in a project that is inconsistent with County standards.

Guideline 5 was selected because CEQA recommends evaluating tribal cultural resources to determine whether or not a proposed action would have a substantial adverse effect. Any project that would have an adverse impact (direct, indirect, and/or cumulative) on a significant tribal cultural resource as defined by these guidelines would be considered to have a significant impact on the environment.
3.0 ANALYSIS OF PROJECT EFFECTS

This section was originally prepared for the Gallegos 2008 report; additions have been made to include ASM’s 2016 site visit.

3.1 METHODS

3.1.1 Survey Methods

As the Project area has been previously surveyed and tested on multiple occasions (Byrd et al. 1994; Cook 1987; Cupples and Eidsness 1978; Gallegos and Kyle 1992; Kidder et al. 1984; Kyle and Gallegos 1992a, 1992b, 1992c, 1992d, 1992e; Rader and Mealey 1991), a field visit of the Project area was conducted by Dennis Gallegos and Nick Doose in November 2007. The field visit consisted of relocating previously recorded sites to identify any changes in site status (e.g., new disturbances). In addition, GPS points were taken at SDI-12337 Area A.

ASM Associate Archaeologist Kent Manchen, M.A., RPA, and Native American Monitor Anthony LaChappa of Red Tail Monitoring and Research, Inc., conducted a site visit on March 23, 2016. Prior to the start of fieldwork, the Project area, previous sites, and previous testing locations were plotted on electronic versions of USGS 7.5-minute topographic maps. The archaeologist and Native American monitor walked transects spaced at 15-m intervals across the Project area to confirm the location of previously recorded resources and to identify if additional unrecorded resources were visible within the Project area. All site and isolate locations were to be recorded in Universal Transverse Mercator (UTM) coordinates using hand-held GeoExplorer Trimble units with sub-meter accuracy. Any new and updated sites were to be plotted on project maps using NAD 27 UTM coordinates. Site information was to be recorded on new or updated State of California DPR 523 series forms to State of California standards. While the process of site documentation would vary slightly depending on what kinds of artifacts and features were identified, the spatial boundaries of all previously recorded sites were to be confirmed and the spatial boundaries of all newly recorded resources were to be delineated, site maps drawn, artifacts plotted, artifact inventories completed, and material types noted.

3.1.2 Test Methods

As previous testing had been conducted by Gallegos and Kyle (1992) and Byrd et al. (1994), additional testing was not conducted for the Gallegos 2008 project. No additional testing was performed for the current 2016 ASM site visit.

3.1.3 Laboratory and Cataloging Procedures

Laboratory and cataloging procedures are not described in this section, as artifacts, ecofacts, or soil samples were not collected for the 2008 Gallegos study or for the current 2016 ASM study.

3.1.4 Curation

Artifact collections, field notes, and reports for SDI-9975 are curated at SDAC (SDAC Repository #130). All artifact collections, field notes, and reports for SDI-12730 are curated at SDAC (SDAC Repository #102). Site SDI-12337 consists of six previously recorded sites, and only one artifact collection has not been located. The majority of collections that have been subsumed under site SDI-12337 are housed at SDAC (SDAC Repository #43, #97, #100, #102, #104-106, #108-109). Brian F. Smith & Associates donated the cultural material collected during Smith’s 1989 study to the Viejas Reservation in 2003. Dr. Lynn Gamble, San Diego State University, was contacted to locate the Cupples
3.0 Analysis of Project Effects

and Eidsness (1978) and Kidder (1984) collections, and reported that she was not able to locate these collections.

If applicable for future phases of this study, all cultural resources excavated or removed from pre-contact or historic sites during testing and/or data recovery programs, along with all associated project data, will be permanently curated at an institution acceptable to the reviewing agencies. Curatorial institutions may include archival facilities within San Diego County or culturally affiliated Tribal Curation facilities that meet the requirements of 36 CFR Part 79. Resources determined to be tribal cultural resources may alternatively be repatriated to a culturally affiliated tribe. The disposition of cultural materials include, but is not limited to, field records, catalogs, and final reports. If requested by the Native American monitor, repatriation of any prehistoric materials, collected by the Native American monitor during construction monitoring will be repatriated to landscaped areas within the public park or within the parkways along the public streets, within an area and depth that will not be disturbed by future ground disturbance.

No artifacts were removed from the Project area during the Gallegos 2008 or the ASM 2016 studies.

3.1.5 Native American Participation

The following is a summary of the Native American participation for the Gallegos 2008 Project:

The NAHC was contacted by Gallegos to request information and/or input regarding Native American concerns either directly or indirectly associated with the Otay Tech Centre project, as well as names of individuals in the area who should be contacted prior to completion of this study. Individuals identified by the NAHC were contacted by letter requesting information regarding cultural resources within the project area. One phone call response was received from Carmen Lucas (Kwaaymii, Laguna Mountain) requesting that Gallegos & Associates offer a field visit to individuals identified by the NAHC. On December 19, 2007, a second letter was sent out inviting those individuals identified by the NAHC to participate in a field visit. Carmen Lucas was the only respondent, and she responded that she would not be able to participate in the field visit, but recommended monitoring of construction grading activity.

The following is a summary of the Native American participation for the current ASM 2016 Project:

ASM Senior Archaeologist Shelby Castells contacted the NAHC via email on February 24, 2016 to request a search of their Sacred Lands File (SLF) for any recorded Traditional Cultural Properties, Tribal Cultural Resources, or Native American heritage sites within the vicinity of the Project area. On February 24, 2016, Gayle Totton of the NAHC responded that the SLF search yielded negative results.

The NAHC additionally provided a list of Native American tribal representatives who might have further knowledge of such sites or other information relating to the Project area. On March 7, 2016, ASM contacted those tribal representatives by letter to solicit further information regarding known Traditional Cultural Properties, Tribal Cultural Resources, and Native American heritage sites. On March 14, 2016, Clinton Linton of the Iipay Nation of Santa Ysabel responded via email questioning if there will be a pedestrian survey of the project and if a Kumeyaay monitor will be present. He also stated that there are multiple resources in the area, likely within the Project, which raises the concern. On March 18, 2016, the Viejas Band of Kumeyaay Indians responded via email that they have reviewed the proposed Project and have determined that the Project site has cultural significance or ties to Viejas and that they request that a Native American Cultural Monitor be on site for ground disturbing activities. To date, no additional responses have been received.
Anthony LaChappa of Red Tail Monitoring and Research acted as the Native American representative during all ASM’s field work within the Project area.

Copies of all correspondence regarding Native American participation and correspondence for this study are provided in Appendix B.

### 3.2 RESULTS

#### 3.2.1 Results from the Gallegos 2008 Study

The following results section was provided in the Gallegos 2008 report for the Project.

Ground visibility was good, as the majority of the project area is within undeveloped land that is covered by moderate amounts of non-native grasses. Disturbance within the project area includes previous farming activity, off-road vehicle activity, and previous grading for adjacent roads.

**CA-SDI-9975**

Site SDI-9975 is a quarry that was originally recorded by Kidder et al. (1984). The field visit was positive, relocating previously recorded site SDI-9975. As site SDI-9975 is situated within undeveloped land, the site status remains as previously described.

**CA-SDI-12337**

Site SDI-12337 is an extensive temporary camp that consists of six previously recorded sites (SDI-5352, SDI-9974, SDI-10072, SDI-10735, SDI-17104, and SDI-17105). These sites were consolidated under the new trinomial designation SDI-12337 by Byrd et al. (1994). The field visit was positive, relocating previously recorded site SDI-12337. As site SDI-12337 is situated within undeveloped land (see Appendix E for the Gallegos 2008 report, Figure 8), the site status remains as previously described.

**CA-SDI-12730**

Site SDI-12730 is a temporary camp that was first recorded by May (1977). The field visit was positive, relocating previously recorded site SDI-12730. As site SDI-12730 is situated within undeveloped land, the site status remains as previously described.

**Historic Structure Location (by Stephen R. Van Wormer)**

The south portion of the project area was part of the Wetmore farm. The Wetmore family settled in Otay Mesa by 1890 and are mentioned as in residence there by the *Otay Press* in the following citations:

Mrs. C. M. Wetmore, cousin of G. H. Wetmore, has purchased forty acres on the Otay Mesa and has just completed a residence on the place, and is setting out a large variety of fruit trees (*Otay Press* 8/14/1890).

Mrs. G. W. Wetmore of San Diego is visiting at H. P. Stars on the Mesa during the absence of her husband, now on a visit to Iowa (*Otay Press* 10/16/1890).

In the spring of 1890, G. H. Wetmore set out ten acres of figs “of the Adriatic and Smyrna variety, ten acres of raisin grapes, as well as lemon, orange, quince, and apricot trees.” He then planted a timber claim with 1,000 Russian mulberry trees (*Otay Press* 2/13/1890). San Diego County Tax Factor Plat Books show G. H. Wetmore as owner of 80 acres in the south half of the southwest quarter of Section 25 from 1892 to 1896 (Tax Factor Maps 1892-1896). A 1912 plat map shows G. H. Wetmore as owner of the same 80 acres and E. J. Wetmore as owner of the adjacent 80 acres in the south half of the southeast
3.0 Analysis of Project Effects

quarter of Section 25 (Alexander 1912). A house is shown near the extreme southwest corner of the eastern 80 acres on the 1903 Cuyamaca 30’ USGS Map. This location is just east of the southeast corner of the project area. The farmstead, located adjacent to the southeast corner of the project area, appears in a 1928 aerial photo of Otay Mesa, a 1937 San Diego County Road Map, the 1943 Jamul 15’ USGS Map, and the 1955 Otay Mesa 7.5’ USGS Map (Aerial Photograph 1928; Road Map 1937; USGS 1903, 1943, 1955a, 1955b) (see Appendix E for the Gallegos 2008 report, Figure 7.) The 1955 map is the first document to show the structure identified within the southeast corner of the project area. The structure, just northwest of the main Wetmore farmstead complex, straddles the line between the original G. H. Wetmore property and the easterly E. J. Wetmore parcel. The Wetmore family still owned and resided on the property adjacent to and east of the project area during the mid-1900s (Wetmore 2000). The structure, therefore, appears to be associated with the Wetmore family.

3.2.2 Results from the ASM 2016 Study

The current survey found the project area in the same condition as described by Gallegos in 2008 with the exception of poor ground visibility due to dense vegetation obscuring the ground surface. Dirt roads across the project area have been recently used. Confidential site maps are provided in Appendix C and DPR forms are provided in Appendix D.

SDI-9975

SDI-9975 was previously recorded as a prehistoric quarry area and lithic material procurement site. Only a small portion of the south side of the site is within the current Project area. Artifacts were not observed within SDI-9975 within the Project area, due to steep slopes and dense and tall grasses.

SDI-12337

SDI-12337 covers a large portion of the Project area. During the current survey, it was noted that dense grasses and other vegetation obscured the ground surface over much of the site. Where patches of cleared ground could be observed, artifacts were often observed. The site boundary was expanded to include a number of artifacts on the east side as well as a lithic concentration of volcanic artifacts including 30+ debitage, three scrapers, one tested cobbles, one core, two percussing tools, three core/percussing tools, one retouched flake, and one handstone fragment. Additional artifacts were observed within the windrows on site. Please see the DPR Form in Appendix D for the updated site boundaries. Overall, the condition of SDI-12337 within the Project area was the same as previously recorded in the Gallegos 2008 report.

SDI-12730

A portion of SDI-12730 was previously recorded within the Project area. That portion of the site has now been disturbed by U.S. Border Patrol and by off-highway vehicle enthusiasts uses. Many lithic artifacts including debitage, two retouched flakes, one scraper, and one exhausted core were identified. All artifacts were dark green or grey volcanic materials. The areas immediately surrounding the southern boundary of the site were surveyed intensively; however, thick grasses following winter rains offered very little ground visibility and no other artifacts were identified. Besides the site disturbance identified above, the condition of SDI-12730 within the Project area was the same as previously recorded in the Gallegos 2008 report.

Historic Structure Location

The Gallegos 2008 report stated that a historic structure was identified in the far southeastern corner of the Project area. ASM failed to relocate the historic structure. A small square concrete planter, approximately 4 x 5 feet, filled with vegetation, was present in the southeast corner. The concrete planter was not large enough to have been a foundation of the historic structure. It is presumed that the historic structure has been removed from the Project area.
P-37-31491

P-37-31491 was recorded in 2010 as a paved, undivided two lane roadway that was in the historic alignment of Otay Mesa Road. During the current survey, Otay Mesa Road was relocated in the same condition as its previous recordation and consisted of a modernly paved, two-lane highway, running east-west. The northern half, the west bound lane, is within the Project area.
4.0 INTERPRETATION OF RESOURCE IMPORTANCE AND IMPACT IDENTIFICATION

4.1 RESOURCE IMPORTANCE

The County of San Diego is the lead review agency for the Project. Therefore, the sites have been evaluated for eligibility for the CRHR under CEQA Guidelines as well evaluated for importance under the County Guidelines. While sites may be recommended as eligible or not eligible for listing on the CRHR based on Criterion 4, data potential, under the County Guidelines all sites are considered “important.” Under the County Guidelines, the “importance” of sites recommended as not eligible for listing on the CRHR can be exhausted through testing, the curation of artifacts, and construction monitoring.

4.1.1 CA-SDI-9975

The Gallegos 2008 field visit was positive, relocating previously recorded site SDI-9975. As site SDI-9975 is situated within undeveloped land, the site status remains as previously described. The site was previously surveyed, tested, and a portion of the site, outside of the current Project area, was identified as significant (Gallegos et al. 2000). Mitigation was achieved through completion of a data recovery program (Gallegos et al. 2003).

During the current survey, ASM failed to relocate SDI-9975 within theProject area, as only a small portion of the recorded boundary of the site is within the Project area, along a steep slope. Based on the previous work conducted at the site, it is recommended that the site be considered a potentially significant resource pursuant to the guidelines of the Local Register, the CRHR, and CEQA. Under the County of San Diego’s Guidelines for Determining Significance (2007a), SDI-9975 is an important resource. SDI-9975 is potentially eligible for listing in the CRHR under Criterion 4 because it has high research potential. SDI-9975 is not significant under the County RPO.

4.1.2 CA-SDI-12337

The Gallegos 2008 field visit was positive, relocating previously recorded site SDI-12337, and stating that as the site is situated within undeveloped land (see Appendix E for the Gallegos 2008 report, Figure 8), the site status remains as previously described. Site SDI-12337 has been identified as not significant on the basis of previous work. Site designation SDI-12337 includes previously recorded sites SDI-5352, SDI-9974, SDI-10072, and SDI-10735 (Byrd et al. 1994). Sites SDI-17104 and SDI-17105 were recorded in 2004 (Robbins-Wade et al. 2004a, 2004b), and are also within the site boundary of SDI-12337.

During the current survey, ASM relocated SDI-12337 in the same condition as previously recorded by Gallegos (2008), and ASM slightly expanded the site boundary to include artifacts identified along the eastern edge of the previously mapped site boundary. This portion of SDI-12337 is located in undeveloped land. The site has been disturbed by prior use of the site. ASM agrees with the prior site evaluations as discussed above, that the site is not significant and does not have further data potential on the basis of previous work. Therefore, it is recommended that the site is not a significant resource pursuant to the guidelines of the Local Register, the CRHR, and CEQA, nor is the site significant under the County RPO. SDI-12337 is eligible for listing in the CRHR under Criterion 4, as it does not have any substantial research potential. The previous archaeological investigations have substantially exhausted the site’s data potential and indicate that no significant subsurface cultural deposits are likely to be present. Further archaeological work at the site is not likely to produce substantially different or unique data that would change these conclusions. Under the County of San Diego’s Guidelines for Determining Significance (2007a), SDI-12337 is an important resource; however, as stated above, the research potential has been exhausted.
4.1.3 CA-SDI-12730

The Gallegos 2008 field visit was positive, relocating previously recorded site SDI-12730. As site SDI-12730 is situated within undeveloped land, the site status remains as previously described. The site was previously surveyed, tested, and a portion of the site was identified as significant (Gallegos and Kyle 1992). In all, 11 STPs and two 1-x-1-m units were excavated at SDI-12730. Given the high number of subsurface artifacts recovered, depth of deposit to 80 cm, and the potential for site SDI-12730 to address important research questions, site SDI-12730 was identified as significant under CEQA.

During the current survey, ASM relocated SDI-12730 and noted that the portion of the site within the Project area contains some disturbances, otherwise the site remains in the same condition. Based on the previous work conducted at the site, it is recommended that the site be considered a potentially significant resource pursuant to the guidelines of the Local Register, the CRHR, and CEQA. Under the County of San Diego’s Guidelines for Determining Significance (2007a), SDI-12730 is an important resource. SDI-12730 is potentially eligible for listing in the CRHR under Criterion 4 because it has high research potential. SDI-12730 is not significant under the County RPO.

4.1.4 Historic Structure Location

The south portion of the project area was part of the Wetmore farm. The 2008 Gallegos study stated that a structure identified within the southeast corner of the project area and shown on the 1955 map appears to be an outbuilding constructed in the 1940s or early 1950s associated with the Wetmore family. As the structure is not associated with the pioneering phase of Otay Mesa settlement or the rural Alta School District community that flourished there prior to World War II, the structure location is not of historical significance.

During the current survey, ASM failed to relocate the historic structure. No remains of the historic structure were identified. Therefore, it is recommended that the area containing the historic structure is not a significant resource pursuant to the guidelines of the Local Register, the CRHR, and CEQA, nor is the site significant under the County RPO.

4.1.5 P-37-31491

P-37-31491 was originally recorded in 2010 as the historic alignment of Otay Mesa Road, as shown on the 1904 USGS 60-minute San Diego quadrangle and the 1903 USGS 60-minute Cuyamaca quadrangle topographic maps, as well as on aerial photographs taken as early as 1928. At the time of the original recordation in 2010 the roadway consisted of a paved, undivided two-lane highway, running east-west. During the current survey, ASM relocated P-37-31491 in the same condition as its previous recordation.

P-37-31491 is not recommended as eligible for CRHR listing or significant under CEQA, as a modernly paved, undivided two lane highway it has not been determined to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California or San Diego County. Therefore, it is recommended that the site is not a significant resource pursuant to the guidelines of the CRHR, CEQA, and the Local Register, nor is the site significant under the County RPO. Under the County of San Diego’s Guidelines for Determining Significance (2007a), P-37-31491 is an important resource; however, the Project will not have an impact to the resource.
4.1.6 Tribal Cultural Resources

No information has been obtained through Native American consultation or communication with the Native American monitors during fieldwork that any of the evaluated sites are culturally or spiritually significant. No Traditional Cultural Properties that currently serve religious or other community practices are known to exist within the Project area. During the current archaeological evaluation, no artifacts or remains were identified or recovered that could be reasonably associated with such practices. All prehistoric artifactual material consisted of common flaked stone and ground stone items, and those in very limited quantities at all sites. No Tribal Cultural Resources were identified or reported from the Native American contacts.

4.2 IMPACT IDENTIFICATION

4.2.1 CA-SDI-9975

The portion of SDI-9975 within the Project area is located within the project area Open Space Easement (Confidential Appendix C), and will be avoided by direct impacts. A portion of SDI-9975 outside of the current Project area, was identified as significant under CEQA (Gallegos et al. 2000). Mitigation was achieved through completion of a data recovery program (Gallegos et al. 2003). However, it should be noted that the portion of SDI-9975 within the Project area was identified as not significant under CEQA and not eligible for the CRHR (Gallegos et al. 2000, 2003). At least a 25-ft. buffer of open space surrounds SDI-9975. The site is an important resource under County of San Diego guidelines for determining significance (County of San Diego 2007a). The site is not significant under County RPO. The Project was designed to place SDI-9975 within an Open Space Easement, curation of artifacts collected during past archaeological testing of the site, and monitoring of all grading within 50 ft. of the site boundaries will reduce the impacts to the site to less than significant.

4.2.2 CA-SDI-12337

A portion of SDI-12337 is located within the Project’s proposed development area, and a portion is within the project area’s Open Space Easement (Confidential Appendix C), and will be avoided by direct impacts. For the portion of site SDI-12337 that will be avoided (placed within open space), indirect impacts may occur from construction activity (i.e., construction vehicle activity), increased accessibility, and the potential for vandalism by relic hunters. For the portion of the site within the proposed development area, direct impacts may occur from proposed construction.

This site is not recommended eligible for listing in the CRHR, or in the Local Register, nor is it a significant resource under the County RPO. The site is an important resource under County of San Diego guidelines for determining significance (County of San Diego 2007a). Curation of artifacts collected during the prior testing programs at the site and monitoring of all grading within 50 ft. of the site boundaries will reduce the impacts to this resource to less than significant.

4.2.3 CA-SDI-12730

The portion of SDI-12730 within the Project area is located within the project area Open Space Easement (Confidential Appendix C), and will be avoided by direct impacts. Previous studies identified that a portion of SDI-12730 is significant under CEQA and eligible for the CRHR. The site is an important resource under County of San Diego guidelines for determining significance (County of San Diego 2007a). The site is not significant under County RPO.

At least a 25-ft. buffer of open space surrounds SDI-12730. The Project was designed to place SDI-12730 within an Open Space Easement, curation of artifacts collected during past archaeological testing of
the site, and monitoring of all grading within 50 ft. of the site boundaries will reduce the impacts to the site to less than significant.

4.2.4 Historic Structure Location

The southern portion of the project area was historically part of the Wetmore farm. The structure identified in the Gallegos 2008 study within the southeast corner of the project area and shown on the 1955 map appears to be an outbuilding constructed in the 1940s or early 1950s associated with the Wetmore family. The Gallegos 2008 study recommended that the structure was not significant under CEQA and not eligible for listing in the CRHR. The current study failed to relocate the structure. Therefore, no impacts are possible.

4.2.5 P-37-31491

P-37-31491, Otay Mesa Road is not recommended eligible for listing in the CRHR, nor is it a significant resource under CEQA, the Local Register, or the County RPO. The site is an important resource under County of San Diego guidelines for determining significance (County of San Diego 2007a). However, the Project will not cause an impact to this resource. The resource consists of the historic alignment of Otay Mesa Road, and the Project will not cause a change to the alignment of the Road. The roadway contains modern paving, and the Project includes sewer work within the existing road way within the modernly paved area, the alignment of the road will remain unchanged and will not be impacted.

4.2.6 Tribal Cultural Resources

No tribal cultural resources were identified during the evaluation of the proposed project site. In addition, the Native American consultants did not express any concerns.
5.0 MANAGEMENT CONSIDERATIONS—MITIGATION MEASURES AND DESIGN CONSIDERATIONS

5.1 UNMITIGATED IMPACTS

There are no unmitigated impacts as the Project was designed to avoid all significant resources.

5.2 MITIGATED IMPACTS

SDI-12337 is recommended as not eligible to the CRHR, Local Register, or County RPO. The site is an important resource under County of San Diego guidelines for determining significance (County of San Diego 2007a). Curation of artifacts collected during the testing programs and monitoring of all grading will reduce the impacts to this resource to less than significant. Artifacts collected during the past testing programs have been curated at the San Diego Archaeological Center. Within the Open Space Area five basins will be created for use as vernal pools, within, a portion of SDI-12337, that was recommended as not eligible to the CRHR, Local Register and County RPO, but that is an important resource under County of San Diego guidelines for determining significance. The same mitigation measures, of curation of artifacts collected during the testing programs and monitoring of all grading will reduce the impacts to this resource within the Open Space area to less than significant. If requested by the Native American monitor, repatriation of any prehistoric materials, collected by the Native American monitor during construction monitoring will be repatriated to landscaped areas within the public park or within the parkways along the public streets, within an area and depth that will not be disturbed by future ground disturbance.

A portion of SDI-9975 outside of the Project has been recommended eligible to the CRHR. The site is an important resource under County of San Diego guidelines for determining significance (County of San Diego 2007a). It is not eligible under the County RPO. The portion of SDI-9975 within the Project area will not be impacted by the Project as it is located in the Open Space Easement. Avoidance of the resource through Project design, curation of artifacts collected during the prior testing programs, and monitoring of all grading within 50 ft. of the site boundaries will reduce the impacts to SDI-9975 to less than significant. Artifacts collected during the testing programs have been curated at the San Diego Archaeological Center. For all portions of the site left in open space, significance is assumed.

A portion of SDI-12730 has been recommended eligible to the CRHR and it is an important resources under County of San Diego guidelines for determining significance (County of San Diego 2007a). It is not eligible under the County RPO. The portion of SDI-12730 within the Project area will not be impacted by the Project as it is located in the Open Space Easement. Avoidance of the resource through Project design, curation of artifacts collected during the prior testing programs, and monitoring of all grading within 50 ft. of the site boundaries will reduce the impact to this resources to less than significant. Artifacts collected during the testing programs have been curated at the San Diego Archaeological Center. For all portions of the site left in open space, significance is assumed.

For resources that have not been evaluated for significance and placed in open space in lieu of significance testing, significance is assumed (County of San Diego 2007b).

Monitoring of all ground disturbances within the Project area and within the off-site improvements is recommended and should include both a qualified archaeologist and Native American Monitor. The Archaeological Monitoring Program should include the following requirements:

- Pre-Construction
4.0 Interpretation of Resource Importance and Impact Identification

- Pre-construction meeting to be attended by the Project Archaeologist and Kumeyaay Native American monitor to explain the monitoring requirements.

- Construction
  - Monitoring. Both the Project Archaeologist and Kumeyaay Native American monitor are to be onsite during earth disturbing activities. The frequency and location of monitoring of native soils will be determined by the Project Archaeologist in consultation with the Kumeyaay Native American monitor. Both the Project Archaeologist and Kumeyaay Native American monitor will evaluate fill soils to ensure that they are negative for cultural resources.

  - If cultural resources are identified:
    - Both the Project Archaeologist and Kumeyaay Native American monitor have the authority to divert or temporarily halt ground disturbance operations in the area of the discovery.
    - The Project Archaeologist shall contact the County Archaeologist.
    - The Project Archaeologist in consultation with the County Archaeologist and Kumeyaay Native American shall determine the significance of discovered resources.
    - Construction activities will be allowed to resume after the County Archaeologist has concurred with the significance evaluation.
    - Isolates and non-significant deposits shall be minimally documented in the field. Should the isolates and non-significant deposits not be collected by the Project Archaeologist, the Kumeyaay Native American monitor may collect the cultural material for transfer to a Tribal curation facility or repatriation program.
    - If cultural resources are determined to be significant, a Research Design and Data Recovery Program shall be prepared by the Project Archaeologist in consultation with the Kumeyaay Native American monitor and approved by the County Archaeologist. The program shall include reasonable efforts to preserve (avoid) unique cultural resources of Sacred Sites; the capping of identified Sacred Sites or unique cultural resources and placement of development over the cap if avoidance is infeasible; and data recovery for non-unique cultural resources. The preferred option is preservation (avoidance).

  - Human Remains.
    - The Property Owner or their representative shall contact the County Coroner and the PDS Staff Archaeologist.
    - Upon identification of human remains, no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin.
    - If the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be contacted by the Property Owner or their representative in order to determine proper treatment and disposition of the remains.
    - The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted.
    - Public Resources Code §5097.98, CEQA §15064.5 and Health & Safety Code §7050.5 shall be followed in the event that human remains are discovered.
    - If needed any repatriation will be performed in landscaped areas within the public park or within the parkways along the public streets, within an area and depth that will not be disturbed by future ground disturbance.

- Rough Grading
5.0 Management Considerations—Mitigation Measures and Design Considerations

- Upon completion of Rough Grading, a monitoring report shall be prepared identifying whether resources were encountered. A copy of the monitoring report shall be provided to any culturally-affiliated tribe who requests a copy.

- Final Grading
  - A final report shall be prepared substantiating that earth-disturbing activities are completed and whether cultural resources were encountered. A copy of the final report shall be submitted to the South Coastal Information Center and any culturally-affiliated tribe who requests a copy.

- Disposition of Cultural Material.
  - The final report shall include evidence that all prehistoric materials have been curated at a San Diego curation facility or Tribal curation facility that meets federal standards per 36 CFR Part 79, or alternatively have been repatriated to a culturally affiliated tribe.
  - The final report shall include evidence that all historic materials have been curated at a San Diego curation facility that meets federal standards per 36 CFR Part 79.
  - If requested by the Native American monitor, repatriation of any prehistoric materials, collected by the Native American monitor during construction monitoring will be repatriated to landscaped areas within the public park or within the parkways along the public streets, within an area and depth that will not be disturbed by future ground disturbance.
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7.0 List of Preparers and Persons and Organizations Contacted

Shelby Gunderman Castells (ASM Affiliates): Authored the technical report and acted as Principal Investigator and Project Manager.

Kent Manchen (ASM Affiliates): Acted as field director and authored sections of the technical report and DPR forms.

Sherri Andrews (ASM Affiliates): Edited the report.

Redtail Research and Monitoring: Acted as the Native American Monitor and attended the field survey.

Native American Heritage Commission: Conducted the record search of the Sacred Lands File.

Nick Doose (SCIC): Conducted the CHRIS records search.

Gallegos & Associates: Conducted the original fieldwork, prepared site forms, cataloged the artifact collection, and conducted artifact analysis and special studies.
8.0 LIST OF MITIGATION MEASURES AND DESIGN CONSIDERATIONS

Avoidance through Project design is the recommended mitigation measure. The recommended mitigation measures for the project are described in Table 3. Monitoring by a qualified archaeologist and Native American Monitor is recommended for all ground disturbance within the Project area and within the off-site improvements. The wetland basins for vernal pool creation within the Open Space area, is within a portion of SDI-12337 that is recommended not eligible for listing on the CRHR, Local Register, and County RPO and it is recommended that all ground disturbance related to wetland or vernal pool creation within the Open Space area be monitored by a qualified archaeologist and Native American Monitor. If requested by the Native American monitor, repatriation of any prehistoric materials, collected by the Native American monitor during construction monitoring will be repatriated to landscaped areas within the public park or within the parkways along the public streets, within an area and depth that will not be disturbed by future ground disturbance.

Table 3. Recommended Mitigation Measures

<table>
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<th>Site Designation</th>
<th>Impacted by the Project Design</th>
<th>Site Type</th>
<th>Evaluation</th>
<th>Mitigation Measure</th>
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<td>SDI-9975</td>
<td>Avoided</td>
<td>Prehistoric Habitation Site and Artifact Scatter</td>
<td>Important resource under County Guidelines. A portion of the site outside the Project area is eligible for the CRHR or Local Register. Not significant under County RPO.</td>
<td>Impacts reduced to less than significant through the Project design, placing the resource within an open space easement.</td>
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<tr>
<td>SDI-12337</td>
<td>Impacted</td>
<td>Prehistoric Artifact Scatter</td>
<td>Important resource under County Guidelines. Not eligible for the CRHR or Local Register. Not significant under County RPO.</td>
<td>Impacts reduced to less than significant through curation of artifacts and grading monitoring, including in the Open Space area for vernal pool creation</td>
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<td>SDI-12730</td>
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<td>Prehistoric Artifact Scatter</td>
<td>Important resource under County Guidelines. Eligible for the CRHR or Local Register. Not significant under County RPO.</td>
<td>Impacts reduced to less than significant through the Project design, placing the resource within an open space easement.</td>
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<tr>
<td>Historic Structure Location</td>
<td>No longer present, not impacted</td>
<td>Historic Structure, no longer present</td>
<td>Not an important resource under County guidelines. Not eligible for the CRHR or Local Register. Not significant under County RPO.</td>
<td>None</td>
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<tr>
<td>P-37-31491</td>
<td>Not Impacted</td>
<td>Road Alignment</td>
<td>Important resource under County Guidelines. Not eligible for the CRHR or Local Register. Not significant under County RPO.</td>
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APPENDIX A

SCIC Record Search Confirmation
CALIFORNIA HISTORICAL RESOURCES INFORMATION SYSTEM
RECORDS SEARCH

Company: ASM Affiliates
Company Representative: Kent Manchen
Date Processed: 3/23/2016
Project Identification: Sunroad East Otay Mesa Specific Plan Amendment

Search Radius: 1 mile

Historical Resources: YES
Trinomial and Primary site maps have been reviewed. All sites within the project boundaries and the specified radius of the project area have been plotted. Copies of the site record forms have been included for all recorded sites.

Previous Survey Report Boundaries: YES
Project boundary maps have been reviewed. National Archaeological Database (NADB) citations for reports within the project boundaries and within the specified radius of the project area have been included.

Historic Addresses: YES
A map and database of historic properties (formerly Geofinder) has been included.

Historic Maps: YES
The historic maps on file at the South Coastal Information Center have been reviewed, and copies have been included.

Summary of SHRC Approved CHRIS IC Records Search Elements

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This is not an invoice. Please pay from the monthly billing statement
APPENDIX B

Confidential NAHC Correspondence

(On File with the County of San Diego)
APPENDIX C

Confidential Maps

(On File with the County of San Diego)
APPENDIX D

Confidential DPR Forms
(On File with the County of San Diego)
APPENDIX E

Confidential Gallegos 2008 Report and Appendices
(On File with the County of San Diego)