

Response to Comment Letter T2

Campo Band of Mission Indians

- T2-1** The commenter states the letter is submitted on behalf of the Campo Band of Mission Indians, which are part of the Kumeyaay people who are indigenous to the Jacumba region. The comment also states Jacumba is a key location in the creator stories, the Jacumba region was a major crossroads from the Pacific coast to the desert and Colorado River region, and further background. In response, the comment provides background information regarding the Kumeyaay people and Jacumba and does not raise an issue regarding the adequacy of the analysis contained within the Draft EIR; therefore, no further response is required.
- T2-2** The commenter states that Jacumba was one of the strongholds of the Kumeyaay. The commenter also states in 1840 Mexican soldiers pursued the Kumeyaay to the Jacumba region and were ambushed and returned in defeat. The commenter then states this was not discussed in the cultural setting. In response, the Cultural Resources Report (Appendix E) of the Final EIR has been revised to include the information provided by the Campo Band.
- T2-3** The commenter states a wide swath of village sites existed between Tecate and Jacumba along the current U.S. Mexican border. The commenter then states the EIR discusses potential impacts to 28 archaeological sites but sites are often just a small part of the cultural resources. The commenter further states the cultural landscape may play a far more critical role and would need on-site experts in the Kumeyaay landscape to make such a determination. The commenter concludes without this knowledge, it is difficult to understand how a determination the Proposed Project's area of direct impact (ADI) lacks standing for eligibility for listing under the CRHR or Local Register was made, and that it does not appear to substantiate a mitigation to non-significance. In response, during AB-52 consultation, no information was provided by the Campo Band regarding the Project site as a cultural landscape. However, the County recognizes the importance of a cultural landscape and the analysis in the EIR considered the significance of the impacted sites in relationship to the larger cultural context. The resources identified within the Proposed Project's ADI consist of light density artifact scatters comprised of limited artifact types. These largely disturbed resources contain less artifact variability and integrity than other resources outside of the ADI. Considering the kinds and numbers of archaeological sites in the general Jacumba region, and in reviewing existing literature, none of the resources on the Project site present new or varied archaeological information. The diversity of the resources within the Project site is extremely low. The resources do

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not represent or convey the significant elements of character defining archaeological sites in the broader region. As such, the resources within the Proposed Project's ADI are not significant contributing elements to the larger cultural landscape. The Cultural Resources Report (Appendix E) and Section 2.6, Cultural Resources, of the Final EIR have been revised to address whether the Project site is a cultural landscape.

- T2-4** The commenter states the Campo Band would like to review the archaeological findings and participate in an on-site review to address the issues of cultural landscape. In response, the Campo Band can review the archaeological findings in the Draft EIR and the Cultural Resources Report (Appendix E). In addition, the archaeological consultant for the EIR will extend an invitation to the Campo Band for an on-site meeting to discuss the cultural landscape.
- T2-5** The commenter states should the Project go forward, the Campo Band would like to ensure that any monitors have adequate understanding and expertise to discern significant resources be they prehistoric or historic, religious, ceremonial or utilitarian. In response, mitigation measure **M-CR-2** requires the implementation of an Archaeological Monitoring Program that includes a Kumeyaay Native American monitor(s). The Kumeyaay Native American monitor(s) will be a qualified monitor and would have knowledge of prehistoric, historic, ceremonial or utilitarian resources.
- T2-6** The commenter states the Campo Band would like to assist in developing a plan for the removal, storage and curation of any items deemed impossible to leave in place. In response, the Cultural Resources Treatment Agreement and Preservation Plan (CRTAPP) will provide requirements related to cultural material storage and final conveyance (curation or repatriation). The final requirements for the storage of and conveyance of cultural materials, whether curation or repatriation, will be made when the CRTAPP is prepared, which requires consensus among consulting tribes.
- T2-7** The commenter states for human remains, the Campo Band would like to be immediately notified and the comment provides contact information. The commenter also states the Kumeyaay Repatriation Committee should immediately be notified. In response, mitigation measure **M-CR-2** requires the Proposed Project to follow State requirements when human remains are encountered. If determined to be of Native American origin, the Native American Heritage Commission (NAHC) would be contacted, and they would identify the Most Likely Descendant (MLD) who would be consulted with regarding the treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The Final EIR has been revised to add the Campo Band to mitigation measures **M-CR-2** and **M-TCR-2** for notification of inadvertent discoveries and human remains. In regard to the Kumeyaay Cultural

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Repatriation Committee (KCRC), it is the County’s understanding that the committee is not an individual tribe, and as such would not be notified. It would be expected that the individual Kumeyaay tribes would notify the KCRC.

T2-8 The commenter provides contact information if there are any questions. This comment is a concluding statement and does not raise an issue regarding the Draft EIR.

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