
**CULTURAL RESOURCES
ADDENDUM REPORT
for the
RUGGED SOLAR PROJECT,
SAN DIEGO COUNTY, CALIFORNIA
PDS2017-MUP-12-007WI**

Lead Agency:

County of San Diego
Planning & Development Services
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Prepared for:

James E. Whalen
President

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SEPTEMBER 2019

NATIONAL ARCHAEOLOGICAL DATA BASE INFORMATION

Authors: Brad Comeau, M.Sc., RPA and Micah J. Hale, Ph.D., RPA

Firm: Dudek

Client/Project Proponent: J. Whalen Associates, Inc.

Report Date: 9/10/19

Report Title: Cultural Resources Addendum Report for the Rugged Solar Project,
San Diego County, California

Type of Study: Cultural Resources Inventory

New Sites: None

Updated Sites: None

USGS Quad: Live Oak Springs 7.5-minute

Acreage: 852 acres

Key Words: Positive survey; prehistoric; historic; Kumeyaay; not significant

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September 10, 2019

James E. Whalen
President
J. Whalen Associates, Inc.
1660 Hotel Circle North, Suite 725
San Diego, CA 92108

RE: *Rugged Solar Project; Cultural Resources Survey Report – No Significant Impacts*

Dear Mr. Whalen:

Please be advised that a cultural resource inventory has been conducted on the Rugged Solar project. It has been determined that there are cultural resources present on this property. A cultural resources inventory and significance evaluation report was prepared for the Rugged Solar project for an Area of Potential Effect (APE) that is larger than the current Rugged Solar impact area. The significance evaluation, conducted by Scharlotta et al. (2013), evaluated all cultural resources that are intersected by the current project impact area, finding no significant impacts to cultural resources. The Project has been plotted on the attached map for your reference (Figure 1).

PROJECT LOCATION

County:	San Diego
USGS 7.5' Quad:	Live Oak Springs, California/Township: 17S, Range: 7E, Sections 8, 9, 15, 16, 17, 20 and 21 Thomas Brothers: 1300 / E3
Address:	North of I-8, east of Ribbonwood Road and west of McCain Valley Road, in the Boulevard Community Planning area, within the unincorporated area of County of San Diego
Assessor Parcel Number(s):	APN 612-030-01, 612-030-19, 611-091-07, 611-091-03, 611-090-04, 611-060-04, 611-090-02, 611-100-07, 611-110-01
UTM:	Various
Elevation:	3,250 ft. amsl.
Owner and Address:	Rugged Solar, LLC., 4250 Executive Square, Ste. 770, San Diego, CA 92037
Survey Type:	Intensive Pedestrian, Archaeological Significance Evaluations
Date of Survey:	April 2013

Field Crew: See Scharlotta et al. (2013)
Native American Monitor: Yes, See Scharlotta et al. (2013)

PROJECT DESCRIPTION

The proposed project (Project Number 60212653) includes development of a 74-megawatt (MW) concentrating photovoltaic (CPV) facility and ancillary structures/facilities, including but not limited to an on-site step-up substation, an operations and maintenance (O&M) building, a 138-kilovolt (kV) Tule gen-tie, and access roads. The gen-tie includes a 69 kV undersling line and would transmit energy produced on site to San Diego Gas & Electric (SDG&E) rebuilt Boulevard Substation located approximately 3 miles south of the Project site. An SDG&E Sunrise Powerlink Project construction tie down area is located in the northeastern portion of the site, and this area is currently disturbed but has been mitigated through the environmental analysis prepared for the Sunrise Powerlink Project.

DESCRIPTION OF PREVIOUS CULTURAL RESOURCES INVESTIGATIONS

Scharlotta et al. (2013) presents the results of a cultural resources inventory and Phase II archaeological evaluation for the Rugged Solar Project, at the time (2013) consisting of a 765-acre project located on the Rough Acres Ranch in McCain Valley, San Diego County, California. The Project is located in Sections 8, 9, 15, 16, 17, 20, and 21, Township 17S, Range 7E, on the Live Oak Springs USGS 7.5' quadrangle.

Scharlotta et al. (2013) completed a cultural resources inventory and evaluation associated with this project. Brian Glenn of Pacific West Archaeology began the archaeological investigation of the original 852-acre project area in 2011; Glenn conducted the original survey fieldwork on October 12 through 24, 2011 and December 7, 2011 through January 7, 2012, producing GIS shape files, and site forms. Brian Glenn and Ken Victorino of Dudek documented the survey results in a formal Phase I inventory report (Glenn and Victorino 2012). The cultural resources study was then contracted to Scharlotta et al. (2013) for evaluation of archaeological sites that would be affected by construction of the 765-acre Project area.

The Scharlotta et al. (2013) 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. The report by Scharlotta et al. (2013) was produced 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.

Glenn's initial study included a records search with the South Coastal Information Center (SCIC), initiation of Native American consultation with the Native American Heritage Commission (NAHC), and an intensive pedestrian survey of 100 percent of the original 852-acre project survey area. Please see Scharlotta et al. (2013) for information regarding site topography and conditions during the survey. The records search identified 16 previously recorded archaeological sites, including 13 prehistoric sites, three sites with both prehistoric and historic components, and eight other cultural resources, including seven isolates and one historic/modern trash scatter (P-37-031676). During the Phase I survey by Glenn, two of those previously recorded sites were combined (CA-SDI-10,359 and SDI-20,059) and three sites were not relocated at their plotted positions (SDI-10,596, SDI-16,367, and SDI-16,374). Glenn also identified 34 additional archaeological sites (22 prehistoric, five historic, and seven with both prehistoric and historic components), and 27 isolated prehistoric artifacts (Glenn and Victorino 2012). This amounted to a total of 49 sites (with the joining of SDI-10,359 and SDI-20,059), 34 isolates, and one historic/modern trash scatter within the original project area.

Following the Brian Glenn Phase I inventory, the project area was reduced to approximately 765 acres. The 2013 project boundary was found to only contain 45 of the original 49 previously recorded sites and 32 of the original 34 isolates. Scharlotta et al. (2013) then conducted an archaeological testing program to evaluate 40 of those 45 prehistoric and historic archaeological sites for significance under CEQA, the County RPO, eligibility for listing in the California Register of Historical Resources (CRHR), and the San Diego County Local Register of Historical Resources (Local Register) within the Project area in March and April 2012. Artifact collections are currently kept at ASM's laboratory in Carlsbad, California, where they were analyzed and catalogued.

The five resources not evaluated within the current project area are sites that either had low data potential and are located outside of the current Major Use Permit (MUP) limits (SDI-20,086, -20,627, -20,638, and -20,648) or were not relocated (SDI-16,367). Out of the 40 sites evaluated by Scharlotta et al. (2013), 31 sites intersected the MUP limits, and 27 of these intersected the 2013 proposed impact areas, while four (SDI-20,626, -20,629, -20,639, and -20,641) were situated within areas of avoidance. Additionally, SDI-20,386 was evaluated, as it intersected an off-site access road. The remaining eight sites evaluated fell outside of the 2013 MUP limits but within the study area and are in areas that may potentially be impacted by project redesigns.

Scharlotta et al. (2013) found that none of the archaeological sites met the criteria to be considered eligible to the CRHR or the Local Register. Additionally, none of the sites are recommended as eligible for protection under the County RPO. The sites evaluated do not possess substantial archaeological deposits or extensive artifact variability. The lack of ample artifact densities and

variability exemplifies the sites' low potential to yield information important to the prehistory or history of the local area, California, or the nation.

Current Rugged Solar Impact Area (2019)

Currently, James Whalen and Associates, Inc. contracted Dudek to review a revised Project layout for Rugged Solar with a reduced impact footprint and wholly contained within the previous 765-acre impact area studied by Scharlotta et al. (2013). In review of previous work against the current Rugged Solar Project impact area, Dudek identified no new impacts and that all previous cultural resources significance evaluations remain valid.

Per the County's January 17, 2017 scoping letter, the County requested this addendum report and a map exhibit documenting all cultural resources as they intersect the new Rugged Solar Project impact area. To that end, Figure 1 attached to this Addendum report shows the locations of CA-SDI- trinomial cultural resources in relation to the revised Rugged Solar Project impact area (outlined in red).

Findings

The current Rugged Solar Project impact area intersects (i.e., impacts) a total of 23 archaeological sites, including: P-37-031680, CA-SDI-4788, CA-SDI-5171, CA-SDI-19873, CA-SDI-20111, CA-SDI-20116, CA-SDI-20624, CA-SDI-20625, CA-SDI-20632, CA-SDI-20634, CA-SDI-20635, CA-SDI-20636, CA-SDI-20637, CA-SDI-20639, CA-SDI-20640, CA-SDI-20641, CA-SDI-20642, CA-SDI-20643, CA-SDI-20644, CA-SDI-20645, CA-SDI-20646, CA-SDI-16367, and CA-SDI-16373/16374. Scharlotta et al. (2013) previously evaluated each of these sites (none are significant or RPO protected); no new sites or new impacts were identified because of this review.

The County of San Diego is the lead review agency for the Project. Therefore, the sites have been evaluated for eligibility to the CRHR under CEQA Guidelines as well as evaluated for importance under the County Guidelines. While all evaluated sites are recommended as not eligible for listing in the CRHR based on Criterion 4 (data potential), under the County Guidelines all sites are considered "important." Although all sites are considered important under the County Guidelines, the "importance" of sites recommended as not eligible for listing in the CRHR can be mitigated by the curation of artifacts recovered during the current evaluation effort and through monitoring during construction.

Combined with the testing program documented by Scharlotta et al. (2013), grading monitoring within the current project's area of potential effect (APE) and the curation of artifacts will reduce the impacts to all sites to less than significant. The potential significance of impacts to other sites

identified during the inventory but not evaluated has been reduced to less than significant through avoidance achieved through project design or redesign (Table 1.). This table includes all 46 sites listed within the original project footprint

Table 1. Archaeological Site Impact Chart

Primary No. P-37-	Trinomial CA-SDI-	Age	Site Type	Phase I and II Efforts	Included in Addendum
Previously Recorded Sites					
4788	4788	Both	AP2. Lithic scatter; AP3. Ceramic scatter; AP4. Bedrock milling; AP15. Habitation debris	Updated during Phase I Inventory; Evaluated during current investigation	Yes
5171	5171	Prehistoric	AP2. Lithic scatter; AP3. Ceramic scatter; AP4. Bedrock milling; AP11. Hearths; AP14. Rock shelter; AP15. Habitation debris	Updated during Phase I Inventory; Not evaluated during current investigation and recommended avoidance by project redesign	Yes
24670	16367	Prehistoric	AP2. Lithic scatter; AP3. Ceramic scatter	Not relocated during Phase I Inventory thus was not evaluated during current investigation.	Yes
24694	16373/16374	Prehistoric	AP2. Lithic scatter; AH4. Trash scatter	Not relocated during Phase I Inventory; Previously recorded location of site was evaluated during current investigation to confirm no subsurface deposits	Yes
31306	19873	Prehistoric	AP2. Lithic scatter; AP4. Bedrock milling	Updated during Phase I Inventory; Evaluated during current investigation	Yes
31671	20111	Prehistoric	AP3. Ceramic scatter; AP4. Bedrock milling	Updated during Phase I Inventory; Evaluated during current investigation	Yes
31680	N/A	Both	AP4. Bedrock milling; AH2. Foundations/structure pads	Updated during Phase I Inventory; Evaluated during current investigation	Yes
10359	10359	Prehistoric	AP2. Lithic scatter; AP3. Ceramic scatter; AP4. Bedrock milling; AH4. Trash scatter	Combined with SDI-20,059 during Phase I Inventory; Evaluated during current investigation	No
10596	10596	Prehistoric		Not relocated during Phase I Inventory and previously recorded location is now outside of the current Project Area thus was not evaluated during current investigation.	No

31305	19872	Prehistoric	AP2. Lithic scatter	Updated during Phase I Inventory; Evaluated during current investigation	No
31625	20068	Prehistoric	AP2. Lithic scatter; AP3. Ceramic scatter	Updated during Phase I Inventory; Evaluated during current investigation	No
32184	20086	Prehistoric	AP4. Bedrock milling	Updated during Phase I Inventory; Not evaluated during current investigation as the site is well outside of the MUP and impact limits.	No
31676	N/A	Historic	AH4. Trash dump	Updated during Phase I Inventory; Evaluated during current investigation	No
31677	20116	Prehistoric	AP2. Lithic scatter; AP3. Ceramic scatter; AP4. Bedrock milling; AP14. Rock shelter	Updated during Phase I Inventory; Evaluated during current investigation	No
31679	20118	Both	AP2. Lithic scatter; AP4. Bedrock milling; AH2. Foundations/structure pads	Updated during Phase I Inventory; Evaluated during current investigation	No
32184	20386	Prehistoric	AP2. Lithic scatter; AP3. Ceramic scatter; AP4. Bedrock milling; AP11. Hearth	Updated during Phase I Inventory; Evaluated during current investigation	No
Sites Recorded During Phase I Inventory					
32501	20624	Prehistoric	AP2. Lithic scatter; AP4. Bedrock milling; AP14. Rock shelter	Recorded during Phase I Inventory; Evaluated during current investigation	Yes
32502	20625	Prehistoric	AP2. Lithic scatter; AP4. Bedrock milling	Recorded during Phase I Inventory; Evaluated during current investigation	Yes
32509	20632	Both	AP2. Lithic scatter; AP3. Ceramic scatter	Recorded during Phase I Inventory; Evaluated during current investigation	Yes
32511	20634	Both	AP2. Lithic scatter; AP3. Ceramic scatter; AP4. Bedrock milling; AH4. Trash scatter	Recorded during Phase I Inventory; Evaluated during current investigation	Yes
32512	20635	Prehistoric	AP4. Bedrock milling	Recorded during Phase I Inventory; Evaluated during current investigation	Yes
32513	20636	Prehistoric	AP2. Lithic scatter; AP4. Bedrock milling	Recorded during Phase I Inventory; Evaluated during current investigation	Yes
32514	20637	Both	AP2. Lithic scatter; AP4. Bedrock milling; AH2. Foundations/structure pads; AH4. Trash scatter	Recorded during Phase I Inventory; Evaluated during current investigation	Yes

32516	20639	Prehistoric	AP2. Lithic scatter; AP3. Ceramic scatter	Recorded during Phase I Inventory; Evaluated during current investigation	Yes
32517	20640	Prehistoric	AP2. Lithic scatter; AP3. Ceramic scatter	Recorded during Phase I Inventory; Evaluated during current investigation	Yes
32518	20641	Prehistoric	AP2. Lithic scatter; AP4. Bedrock milling	Recorded during Phase I Inventory; Evaluated during current investigation	Yes
32519	20642	Prehistoric	AP4. Bedrock milling	Recorded during Phase I Inventory; Evaluated during current investigation	Yes
32520	20643	Prehistoric	AP2. Lithic scatter; AP4. Bedrock milling	Recorded during Phase I Inventory; Evaluated during current investigation	Yes
32521	20644	Both	AP2. Lithic scatter; AP4. Bedrock milling; AP8. Rock feature; AH4. Trash scatter	Recorded during Phase I Inventory; Evaluated during current investigation	Yes
32522	20645	Prehistoric	AP2. Lithic scatter; AP3. Ceramic scatter; AP4. Bedrock milling	Recorded during Phase I Inventory; Evaluated during current investigation	Yes
32523	20646	Historic	AH4. Trash scatter	Recorded during Phase I Inventory; Evaluated during current investigation	Yes
32495	20618	Both	AP4. Bedrock milling; AH6. Water conveyance system	Recorded during Phase I Inventory; Evaluated during current investigation	No
32496	20619	Prehistoric	AP2. Lithic scatter; AP4. Bedrock milling; AP15. Habitation debris	Recorded during Phase I Inventory; Evaluated during current investigation	No
32497	20620	Both	AH5. Wells/cisterns; AH6. Water conveyance system; AP2. Lithic scatter; AP3. Ceramic scatter; AP4. Bedrock milling	Recorded during Phase I Inventory; Evaluated during current investigation	No
32498	20621	Prehistoric	AP2. Lithic scatter; AP4. Bedrock milling	Recorded during Phase I Inventory; Evaluated during current investigation	No
32499	20622	Prehistoric	AP2. Lithic scatter; AP4. Bedrock milling	Recorded during Phase I Inventory; Evaluated during current investigation	No
32500	20623	Historic	AH8. Dam	Recorded during Phase I Inventory; Evaluated during current investigation	No
32503	20626	Both	AP4. Bedrock milling	Recorded during Phase I Inventory; Evaluated during current investigation	No
32504	20627	Prehistoric	AP2. Lithic scatter; AP4. Bedrock milling	Recorded during Phase I Inventory; Not evaluated	No

				during current investigation as the site is well outside of the MUP and impact limits.	
32505	20628	Prehistoric	AP2. Lithic scatter; AP3. Ceramic scatter	Recorded during Phase I Inventory; Evaluated during current investigation	No
32506	20629	Prehistoric	AP4. Bedrock milling	Recorded during Phase I Inventory; Evaluated during current investigation	No
32507	20630	Both	AP2. Lithic scatter; AP4. Bedrock milling	Recorded during Phase I Inventory; Evaluated during current investigation	No
32508	20631	Prehistoric	AH16. Earthen berms	Recorded during Phase I Inventory; Evaluated during current investigation	No
32510	20633	Prehistoric		Recorded during Phase I Inventory; Not evaluated for the current investigation as the site is now located outside of the current Project Area.	No
32515	20638		AP2. Lithic scatter	Recorded during Phase I Inventory; Not evaluated during the current investigation as the site is well outside of the MUP and impact limits.	No
32525	20648		AP2. Lithic scatter; AP3. Ceramic scatter; AP15. Habitation debris	Recorded during Phase I Inventory; Not evaluated during the current investigation as the site is well outside of the MUP and impact limits.	No
32630	20683	Historic	AH16. Possible aerial landmark	Recorded during Phase I Inventory; Evaluated during current investigation	No
32631	20684	Historic		Recorded during Phase I Inventory; Not evaluated for the current investigation as the site is now located outside of the current Project Area.	No
32632	20685	Prehistoric		Recorded during Phase I Inventory; Not evaluated for the current investigation as the site is now located outside of the current Project Area.	No

Artifacts from the Scharlotta et al. (2013) testing program are curated at the San Diego Archaeological Center (SDAC). California Department of Parks and Recreation (DPR) forms for each resource are on file at the South Coastal Information Center (SCIC) of the California Historical Resources Information System (CHRIS) at San Diego State University (SDSU).

Mr. James Whalen

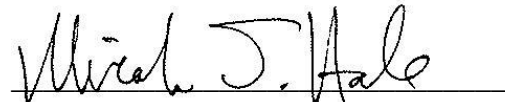
RE: *Rugged Solar Project; Cultural Resources Addendum – No Significant Impacts*

SUMMARY

This letter has provided the results of a cultural resources survey conducted for the revised Rugged Solar Project. We agree with the findings and recommendations by Scharlotta et al. (2013) for cultural resources impacted by the current Rugged Solar revised impact area. Based on conditions documented by Scharlotta et al. (2013), it is recommended that archaeological and Native American monitors be present during initial ground disturbing activities during project construction in order to ensure proper treatment of inadvertent discoveries in accordance with state laws and county guidelines.

Please contact me at Dudek if you have any questions regarding this report and its findings.

Respectfully Submitted,



Micah J. Hale, Ph.D., RPA

Archaeologist/Cultural Resource Technical Lead

DUDEK

cc: Brad Comeau, Dudek
Brock Ortega, Dudek

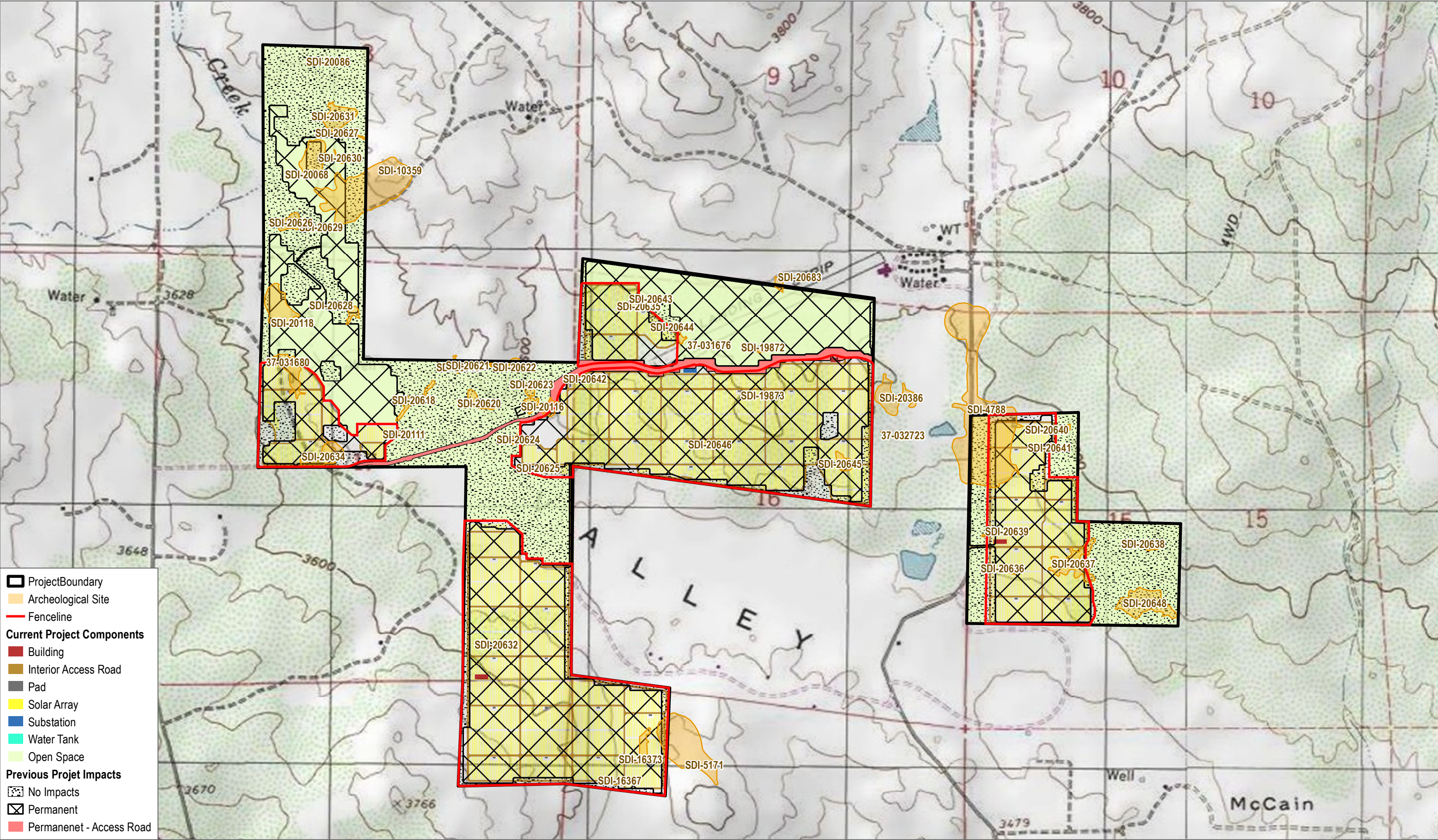
Att: Figure 1. Cultural Resources Impacts Map
Figure 2. Project Vicinity Map

Mr. James Whalen

RE: Rugged Solar Project; Cultural Resources Addendum – No Significant Impacts

References

Scharlotta, Ian, James Daniels, Adam Giacinto, Micah Hale, and Sarah Stringer-Bowsher, 2013, Archaeological Evaluation for the Rugged Solar Project, 3300 12-007 (MUP) Environmental Review Project number 3910-120005, San Diego County, California. Submitted to County of San Diego Department of Planning and Land Use.



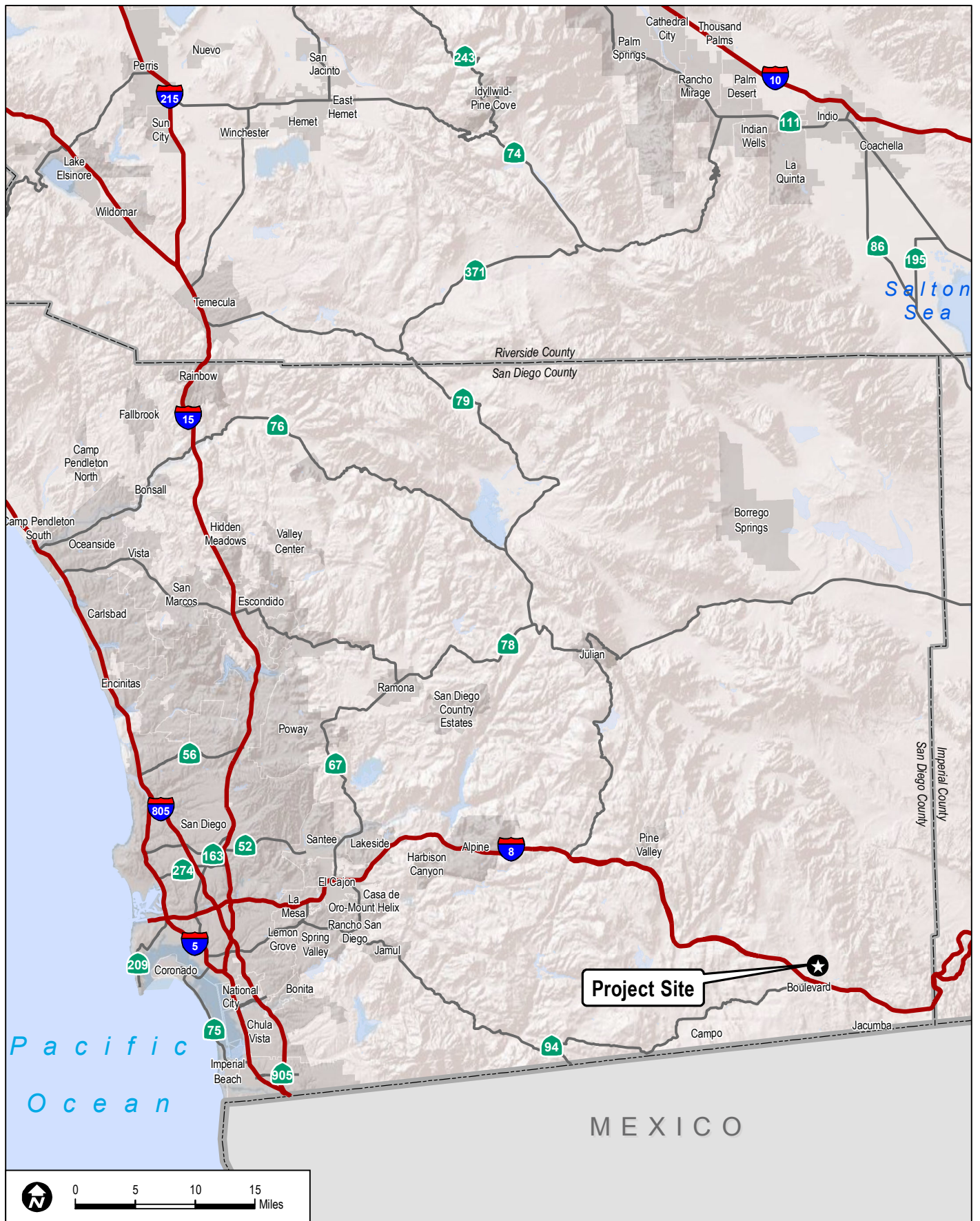
SOURCE: Michael Baker 2019; USGS Topo Maps

FIGURE 1
Rugged Solar Cultural Resources - Project Impact Comparison
Rugged Solar

Mr. James Whalen

RE: Rugged Solar Project; Cultural Resources Addendum – No Significant Impacts

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FIGURE 2
Regional Map

Mr. James Whalen

RE: Rugged Solar Project; Cultural Resources Addendum – No Significant Impacts
