

**Cultural Resources Phase I Survey and Phase II Evaluation  
for the Valley Center Storage Project:  
29523 Valley Center Road, San Diego, California**

**Valley Center Storage Project  
PDS2020-STP-20-011**

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**June 2020**

## **NATIONAL ARCHAEOLOGICAL DATA BASE INFORMATION**

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Acreage: 24.08-acres

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## **LIST OF ACRONYMS**

APE	Area of Potential Effect
APN	Assessor's Parcel Number
BESS	battery energy storage system
CEQA	California Environmental Quality Act
CHRIS	California Historical Resources Information System
CRHR	California Register of Historical Resources
ESA	environmentally sensitive area
GIS	Geographic Information System
GPS	Global Positioning System
kV	kilovolt
MW	megawatt
NAHC	Native American Heritage Commission
Project	Valley Center Storage Project
RPO	Resource Protection Ordinance
SCIC	South Coastal Information Center
SDG&E	San Diego Gas and Electric Company
SLF	Sacred Lands File
STP	shovel test pit
USGS	United States Geological Survey

## **EXECUTIVE SUMMARY**

Chambers Group, Inc. was contracted by Valley Center ESS, LLC (Developer) to conduct an Extended Phase I Cultural Resources Assessment in 2019 and 2020. The Developer plans to construct, own and operate the Valley Center Storage Project, comprised of a lithium-ion based battery energy storage system (BESS) Project located on an 8.93 acre site, an access and utility easement and an approximately 0.3 mile underground generation-tie line (gen-tie line) connecting the Project to the SDG&E Valley Center substation (Project). The Project is located in unincorporated Valley Center, San Diego County, California.

The scope of work included background research and field surveys to identify and delineate the boundaries of cultural resources within the Project Area. The background research was conducted at the South Coastal Information Center (SCIC) housed at San Diego State University and a Sacred Lands File (SLF) search at the Native American Heritage Commission (NAHC). The SCIC records search showed two previously recorded archaeological sites within the Project site, however the NAHC SLF search did not show any previously recorded sacred lands within the Project Area or within 1 mile of the Project Area. Tribal outreach for the Project is ongoing. Fieldwork was conducted on November 27, 2019, March 31-April 3, April 13-April 14, April 27, and June 2, 2020. All field notes, and photographs are on file digitally with Chambers Group. No artifacts were collected from the field. Artifacts were documented, photographed, and returned to the shovel test pit (STP) they were found in. One positive STP is located within the proposed area of impact (STP 60N/20E) while the other positive STP (45N/70E) is located just outside of the proposed footprint and yielded 1 burned small mammal bone, one flake, and one piece of plate glass. Artifacts documented from STPs were returned to the STP and level they were recovered from.

The results of the field survey confirmed the presence of these previously recorded multi component archaeological sites, and site update forms were prepared. At the request of the Developer, Chambers Group, Inc. returned to the Project site to implement an STP program to clearly delineate the boundaries of the previously recorded archaeological sites and evaluate their significance according to the criteria for listing on the California Register of Historical Resources and to allow for a reduced buffer area around the sites. A protective wall will be built between artifact concentrations and the Project infrastructure. The Project has been designed to avoid all cultural resources with the exception of ephemeral areas associated with P-37-000759. The results of the initial survey and the evaluation concluded that the portions of the site that will be impacted by Project development do not meet the eligibility criteria for listing on the California Register of Historical Resources. Due to the demonstrated cultural resources sensitivity of the area, temporary protective fencing and construction monitoring are recommended during Project construction.

## **SECTION 1.0 – INTRODUCTION**

### **1.1 PROJECT DESCRIPTION**

#### **1.1.1 Project Overview**

Valley Center ESS, LLC (Developer) plans to construct, own and operate the Valley Center Storage Project, a lithium-ion based battery energy storage facility capable of delivering up to 140 megawatts (MW) for approximately 4 hours on an 8.93-acre parcel and associated utility and access easement in Valley Center, San Diego County (the Project). The Project will interconnect to the existing, adjacent San Diego Gas & Electric (SDG&E) 69kV Valley Center Substation via an approximately 0.3-mile underground generation tie line (gen-tie line). The Project will be comprised of sets of four battery enclosures (each enclosure approximately 31.6 feet long by 5.7 feet wide by 8.6 feet high) that will house the integrated Battery Energy Storage System (BESS) including battery cells, modules, racks, a fully integrated fire and safety systems, HVAC systems, and other electrical systems. The batteries will be charged from the CAISO (California Independent System Operator) grid via the Project's interconnection to the SDG&E Valley Center Substation. Energy stored in the Project will then be discharged back into the grid when the energy is needed, providing essential electricity reliability services to the local area. The Project plans to start construction in the fourth quarter of 2020 and begin operations by August 1, 2021.

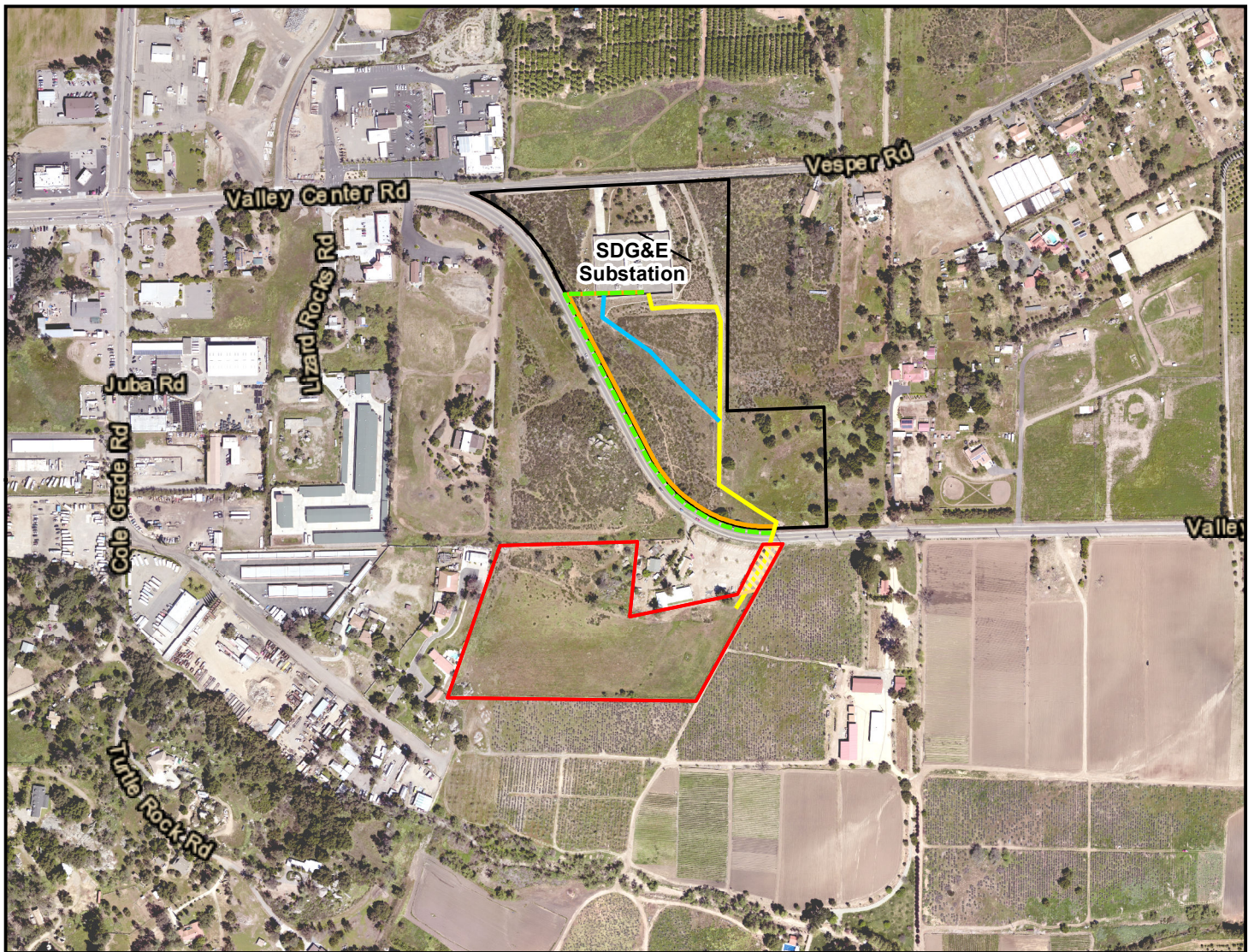
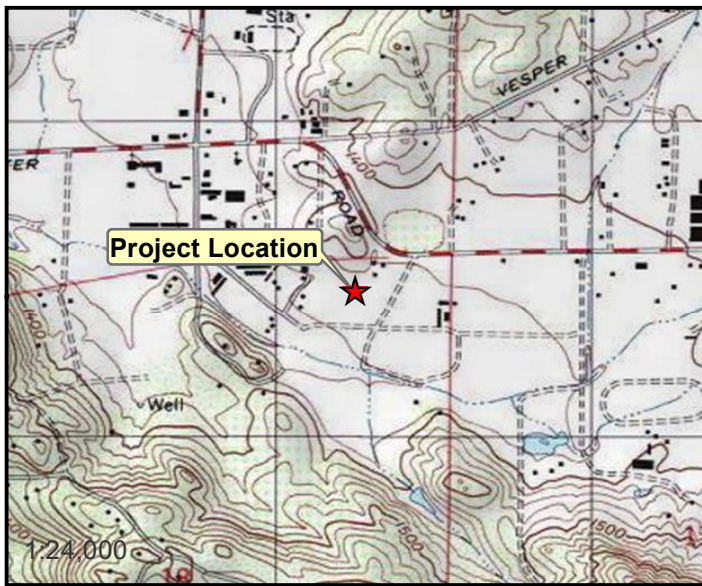
#### **1.1.2 Project Site and Location**

The Project site is located at 29523 Valley Center Road, Valley Center, California on a parcel of private land (APN 189-013-20-00) within unincorporated Valley Center in San Diego County (Figure 1). San Diego County (County) identifies land use and zoning of the Project site as Medium Impact Industrial (I-2) and General Impact Industrial (M54) use regulation. Permitted uses in the Medium Impact Industrial zone are manufacturing, processing, and assembly; warehousing and distribution; large equipment supply and sales; and other industrial or commercial activities. The M54 use regulation allows for unenclosed commercial and industrial operations having potential nuisance characteristics such as construction, sales, and services. The County of San Diego has identified the Project as a Minor Impact Utility, defined as public utilities which have a local impact on surrounding properties and are necessary to provide essential services. All Minor Impact Utilities, including the Project, are permitted by right within the M54 use regulation (County of San Diego Zoning Ordinance).

Additionally, the Project Area is located in an area under County Special Area Regulations, Designator B: Community Design Review Area, where visual impacts criteria must be met through a limited Site Plan approval process. These regulations are intended to ensure that added consideration is provided to visual impacts in areas of special interest. Surrounding land uses include Limited Impact Industrial to the north, Semi-Rural Residential (SR-4 and SR-2) to the east and south, and Medium Impact Industrial to the west (Figure 2).

The Project site is defined as the 8.93-acre parcel and the Project-controlled access easement. The Project Area (also defined within this report as the Area of Potential Effect [APE]) is described as both the Project site and the preliminary alignment options for the approximately 0.3-mile offsite underground gen-tie line from the Project site to the existing SDG&E Valley Center Substation as shown on Figure 1.

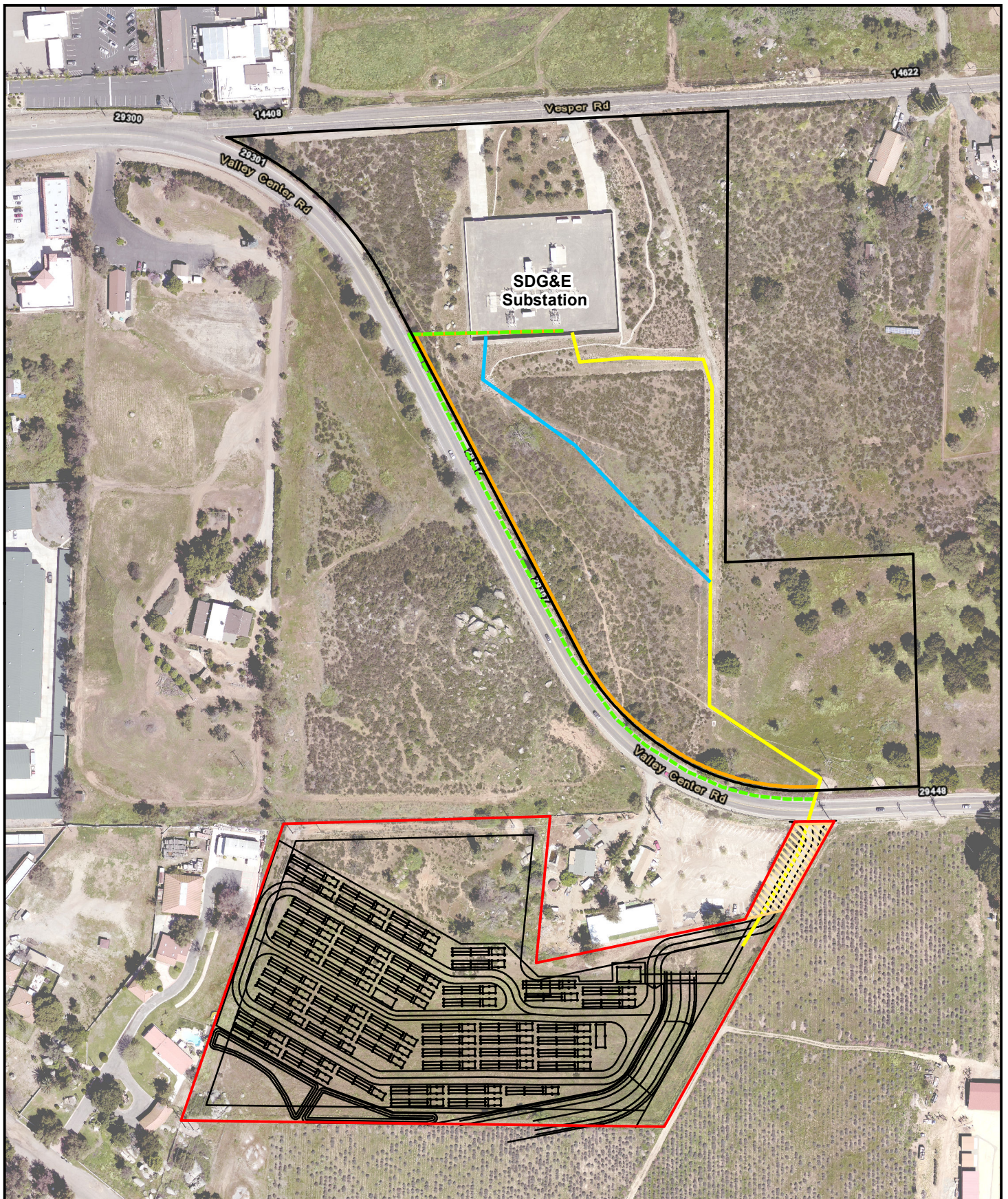




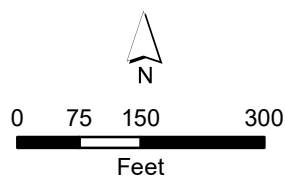
- Project Site
- SDG&E Property Boundary
- Private Access Easement
- Preliminary Underground 69kV Alignment**
- Option A
- Option C
- Option B
- Option D

**Figure 1**  
Valley Center Storage Project  
Project Area





- Project Site
- SDG&E Property Boundary
- Private Access Easement
- Preliminary Underground 69kV Alignment**
- Option A
- Option C
- Option B
- Option D



**Figure 2**  
Valley Center Storage Project  
Preliminary Project Design



### **1.1.3      Project Description**

The Project will be comprised of lithium ion battery modules housed in cabinets within up to 58 sets of 4 non-walk-in enclosures on dedicated foundations that will be capable of charging and delivering up to 140MW for approximately 4 hours. Each enclosure will contain integrated battery, heat/fire and safety management systems including electrical and mechanical controls, ventilation systems, HVAC, fire alarm detection and heat management systems. From the BESS containers, low voltage cables will connect to low profile, pad- inverter/transformers located adjacent to the BESS units, and to a control center enclosure called a Power Distribution Center (PDC).

Major Project equipment and facilities include:

- Up to 58 sets of 4 BESS enclosures including battery modules and integrated battery, fire, and safety management systems.
- Up to 58 pad-mounted inverter/transformers located adjacent to each set of BESS enclosures to convert direct current into alternative current and step the units' voltage up to 34.5 kV.
- 2 PDC enclosures which are modular electrical equipment enclosures housing energy management systems, communications/SCADA equipment, and other electrical equipment.
- A BSU (Battery Step-Up Transformer), circuits will enter the BSU from the PDC at 34.5 kV where voltage will be stepped up to 69kV.
- An approximately 0.3-mile 69kV gen-tie line will be constructed from the Project BSU north across Valley Center Road to SDG&E 69kV Valley Center Substation across one of four alignment options (described further below).
- Security lighting and fencing
- Stormwater drainage and retention basins
- Signage

The exact size and quantity of the battery storage containers and inverter transformers may vary depending on the battery and BESS manufacturer(s) selected for the Project.

Access to the Project site is provided from Valley Center Road via a permanent Project-controlled easement. The site access road will comply with County regulations and be stabilized using gravel in order to provide access to operational, fire department, and emergency vehicle access to the facility. Project site equipment and facilities (with the exception of stormwater drainage and retention basins) will be surrounded by a solid, 8-foot tall vinyl fence or a similar solid fence. The fence will be built flush with the ground and have the appearance of a paneled wood fence. Existing fences surrounding the property boundary will remain. Existing fences surrounding and adjacent to the property boundary will remain. The Project design will adhere to County Guidelines, including the Valley Center Design Guidelines. Lighting at the Project site will be installed per County requirements.

The Project will be unmanned during operations, with no buildings or parking areas. The Project would not require restroom facilities. Any operational water that may be required for routine maintenance would be trucked in from offsite or sourced by a new Valley Center Municipal Water District (VCMWD) service. No groundwater would be used for any purposes during construction or operational phases of the Project.

The Project will interconnect to the existing, adjacent SDG&E 69kV Valley Center Substation via a Project-constructed underground gen-tie line that, upon leaving the Project site will cross Valley Center Road

heading north onto SDG&E property for approximately 0.3 miles. Four alignment options are being considered and evaluated for the gen-tie line (Figure 1). All four options leave the Project site access easement, cross under Valley Center Road and then:

- Option A: enters SDG&E's property and heads north, adjacent to existing SDG&E underground circuits within SDG&E's property and enters the substation at the point of interconnect.
- Option B: enters SDG&E's property following Option A but travels across the property in a northwesterly direction until reaching the substation.
- Option C: follows the southern and western property boundaries within SDG&E's property until turning easterly to access the substation from the west.
- Option D: follows the west-bound Valley Center Road right-of-way before entering SDG&E's property, following Option C in the easterly direction to access the substation.

All four options are approximately the same length.

The Project will be operated, monitored and dispatched remotely on a day-to-day basis. Crews of two to four persons will periodically visit the site (approximately twice per month) for routine inspection and maintenance of the facilities and site. The Developer will own and maintain the gen-tie line up to the point where the gen-tie line enters SDG&E property, where ownership and maintenance responsibilities will be transferred to SDG&E.

The facility is anticipated to have a Project life of approximately 30 years. At the end of the Project life, most of the Project's enclosures, batteries, and electrical equipment (breakers, transformers, inverters) would be removed and recycled. Equipment foundations and pads would be demolished and removed.

#### **1.1.4 Project Construction**

Project construction includes site preparation and grading, installation of drainage and retention basins, foundations/supports, setting battery enclosures, wiring and electrical system installation, and assembly of the accessory components including inverter transformers and generation step-up transformers. The Project would require the grading of approximately 3,000 cubic yards of soils, balanced on site (no net import or export). The approximately 0.3-mile gen-tie line will be installed underground by the Project to the SDG&E 69kV Valley Center substation.

#### **Construction Schedule, Sequence and Phasing**

In accordance with the County Noise Ordinance, Project construction will occur between the hours of 7:00AM and 7:00PM Monday through Saturday. Construction of the Project is anticipated to occur over approximately 6 months, beginning as early as fourth quarter 2020. Project construction would likely occur in two phases:

- Phase 1 – Installation of battery storage enclosures and associated civil, electrical, and structural features placed outside of the floodplain. During Phase 1, ancillary features, such as graveled access roads and underground electrical components, that are not considered "encroachment" would be installed within the floodplain.
- Phase 2 – Installation of remaining battery storage enclosures and associated civil, electrical, and structural features placed within the floodplain; includes features, such as pad-mounted

switchgear, step-up transformer(s), and a control center enclosure, that could be considered “encroachment” within the floodplain.

The two construction phases would likely be executed consecutively; Phase 1 followed by Phase 2. However, for the purposes of preparing a worst-case CEQA analysis, technical analyses were completed assuming the two construction phases would occur simultaneously over a period of approximately 6-12 months.

The sequence of construction activities for the BESS would generally occur as follows (with activities limited within the floodplain as described in Phase 1 and Phase 2 above):

1. Equipment staging and mobilization
2. Site preparation and grading
3. Preparation of equipment foundations
4. Site compaction and gravel as necessary
5. Excavating footings and pads
6. Pour-in-place concrete footings, pad foundations, and/or piers
7. Install below-ground conduit banks
8. Install PCS, power distribution systems, and pad-mounted transformers
9. Install below-ground and above-ground conduit
10. Install safety features, permanent fencing, and security lighting
11. Commissioning

The approximately 9 acre-feet of water required during the duration of construction is expected to be provided by VCMWD through a temporary use agreement.

### **Construction Personnel and Equipment**

Construction personnel are expected to consist of approximately 10 to 15 workers on average, depending on the construction activities. Project laydown and construction staff parking is expected to be located on-site to the extent practicable. The Project may need to utilize an offsite temporary use area, up to approximately 2 acres in size, for equipment storage during construction. Should it be needed, the temporary use area would be located within 2 miles of the Project site, on a site that has been previously disturbed, and where temporary equipment storage is an allowable use and compatible with the existing uses on the property. The technical analyses prepared for the Project have been conducted assuming use of a temporary offsite area following these parameters. If it is determined that use of a temporary offsite area is needed during Project construction, the selected location will be submitted to the County and shown to be consistent with the technical analyses performed for the Project.

Typical equipment expected to be used during Project construction and commissioning:

- Excavator (2)
- Backhoe (2)
- Dozer (1)
- Roller/Compactor (1)
- Dump truck (2)
- Concrete mixer (3)



- Flatbed-mounted utility crane (1)
- Portable generator and welding equipment (1)
- Forklift (1)
- Pickup trucks (4)
- Utility line trucks (2)

## 1.2 EXISTING CONDITIONS

The Project site is currently characterized as fallow farmland. Aerial photographs appear to indicate that by 2010 the field had begun to be reclaimed by a combination of predominantly disturbed vegetation and native and non-native vegetation, particularly in the western area below the rising knoll at the northwest of the Project site. A disused wellhead and appurtenances are located near the southeastern corner of the Project site, and a detention basin is located near the northeast corner. Disturbed dirt pathways, former building pads, and dimensional lumber are visible across the northwestern quarter of the Project site as evidence of the former working farmland.

The Project Area (APE) includes both the Project site described above and the preliminary alignment options for the approximately 0.3-mile offsite underground gen-tie line from the Project site to the existing SDG&E Valley Center Substation as shown on Figure 1. To varying degrees, the alignment options are located within or adjacent to bare ground, non-native grassland, and Coastal Sage Scrub of varying quality. The Project Area is surrounded by industrial/commercial areas of unincorporated Valley Center including several storage facilities, propane gas distributors, and the adjacent SDG&E Valley Center Substation. The Project Area is located in the United States Geological Survey (USGS) Valley Center 7.5-minute quadrangle map (Figure 1).

### 1.2.1 Environmental Setting

#### **Natural**

The Project Area lies within the Peninsular Range Region of San Diego County. The lower Peninsular Range Region is made up of foothills that span in elevation from 600 to 2,000 feet above mean sea level. It is characterized by rolling to hilly uplands that contain frequent narrow, winding valleys. Specifically, the APE is located in the foothills subprovince of the Peninsular Ranges Geomorphic Province, a region typified by northwest-southeast-trending structural blocks separated by major regional fault zones. The Project Area lies west of the major regional fault and mountain ranges of the Peninsular Ranges Province in an area transitional between the coastal plain to the west and the granitic highlands to the east. Surface exposures in the area include rocks ranging in age from Mesozoic to Quaternary as well as recent soils and alluvial deposits of variable depth and composition (City of Escondido 2000).

The Project site primarily consists of disturbed land that was previously used as farmland and has been extensively graded and cleared. Small areas of low-quality Diegan Coastal Sage Scrub: Interior form habitat and exposed bedrock are also located within the Project site, primarily along the northern portion of the Project site. The Project site is surrounded by multiple silverleaf mountain gum (*Eucalyptus pulverulenta*) groves used for the cut flower trade to the east and south, commercial and residential properties located on industrial-zoned parcels to the west and north, as well as bordered by Valley Center Road to the north. Site P-37-000759 was occupied during the historic and prehistoric eras. No temporally diagnostic artifacts or datable materials such as charcoal were recovered from the site, so the date of prehistoric occupation

is not available. It is expected that during the periods of human occupation the natural environment would have been comparable to the current conditions.

The Project Area, specifically that portion of the APE north and east of Valley Center Road, consists of both disturbed land and low-quality Diegan coastal Sage Scrub. The disturbed land and areas of non-native grasses result primarily from activities associated with the construction and operations of the SDG&E Valley Center substation and existing, associated above ground and underground electric transmission infrastructure. The Project Area is also bordered to the north by Vesper Road and rural agricultural property to the east.

The APE is underlain by Cretaceous period Tonalite (Kt) and Granodiorite granitics (Kgd and Kgb) and is substantially overlain by Older alluvial (Qoa) and colluvial (Qoc) Pleistocene deposits (Kennedy 1999). Soils are predominately mapped as Visalia sandy loam, 0 to 2 percent slopes, with a small percentage of Fallbrook sandy loam, 5 to 9 percent slopes. Visalia series soils are generally associated with alluvial fans at elevations ranging from 600 to 1,200 feet, with a mean annual precipitation of 15 inches, a mean annual air temperature of 57 degrees Fahrenheit (°F), and 200 to 350 frost-free days. Fallbrook sandy loam soils are generally associated hillsides and toeslopes at elevations ranging from 200 to 3500 feet, with a mean annual precipitation of 12 to 18 inches, a mean annual air temperature of 63 °F, and a frost-free period of 250 to 320 days (USDA NRCS 2020).

A seasonal tributary to the southern branch of Keys Canyon Creek trends westerly approximately 1,000 feet south-southwest.

## **Cultural**

### Prehistory

The prehistoric cultural sequence in northern San Diego County is generally conceived as comprising three basic periods: (1) the Paleoindian Period, dated between about 11,500 and 8,500 years ago; (2) the Archaic Period, lasting from about 8,500 to 1,500 years ago (A.D. 500); and (3) the Late Prehistoric Period, lasting from about 1,500 years ago to historic contact (i.e., A.D. 500 to 1769) and represented by the Cuyamaca and San Luis Rey Complexes.

### Paleoindian Period

The Paleoindian Period in San Diego County is most closely associated with the San Dieguito Complex, as identified by Rogers (1938, 1939, 1945). The San Dieguito assemblage consists of well-made scraper planes, choppers, scraping tools, crescentics, elongated bifacial knives, and leaf-shaped projectile points. The most thoroughly investigated San Dieguito component in San Diego County is found at CA-SDI-149 (the C.W. Harris site), located on a terrace overlooking the San Dieguito River. The San Dieguito Complex is thought to represent an early emphasis on hunting (Warren et al.1993: III-33).

### Archaic Period

The Archaic Period in coastal San Diego County is represented by the La Jolla Complex, a local manifestation of the widespread Millingstone Horizon. Archaic assemblages in interior northern San Diego County have been designated as the Pauma Complex. The La Jolla and Pauma complexes have very similar assemblages and are thought to be different environmental adaptations of the same culture (True 1958).

Both La Jolla and Pauma Complex assemblages suggest a generalized subsistence focus with an emphasis on hard seeds. This emphasis is indicated by the increased frequency of slab and basin metates and the adoption of a mixed cobble/core-based tool assemblage composed primarily of crudely made choppers, scrapers, and cobble hammerstones. For coastal La Jolla Complex sites, large deposits of marine shell argue for the importance of shellfish gathering to the coastal Archaic economy.

Pauma Complex sites are typically found on terraces or ridges above a water source such as a stream. They often do not have discernible midden development, but they may have subsurface deposits. While they typically have numerous portable metates and manos, they lack bedrock milling and mortars and pestles (True and Waugh 1981:101-102).

There seems to have been some reorientation in settlement from coastal to inland settings during the latter portion of this period in northern San Diego County. This settlement shift appears to have occurred around 4,000 years ago and is thought to relate to the final phases of Holocene sea level rise and the resulting siltation of coastal lagoons. Prior to this time, the lagoons had been highly productive sources of shellfish for La Jollan people (Gallegos 1987; Warren et al. 1993).

#### Late Prehistoric Period

The late prehistoric archaeology of the San Diego coast and foothills, beginning approximately 1,500 years ago, is characterized by two major complexes: The San Luis Rey and the Cuyamaca. The definition of the San Luis Rey complex was based primarily on excavations near Pala, about 10 miles north-northwest of the Project Area. The San Luis Rey complex is thought to represent the ancestors of the ethnographic Luiseño (True 1966, 1970) who arrived in northern San Diego County as part of the large series of coastward migrations of Shoshonean speakers, sometimes called the Takic Wedge (Meighan 1954; Waugh 1986). San Luis Rey I is characterized by slab metates and mortars, both of which can be found in shaped and unshaped, bedrock and portable configurations. Cremations, bone awls, and stone and shell ornaments are also prominent in the material culture. In San Luis Rey II assemblage, pottery cooking and storage vessels, and cremation urns, polychrome pictographs appear. Chipped stone arrow points are dominated by the Cottonwood Triangular series, but Desert Side-notched, Dos Cabezas Serrated, leaf-shaped, and stemmed styles also occur.

The Cuyamaca complex is primarily known from the work of D. L. True at Cuyamaca Rancho State Park. The Cuyamaca complex is characterized by the presence of steatite arrow shaft straighteners, steatite pendants, steatite comales (heating stones), Tizon Brown Ware pottery, ceramic figurines reminiscent of Hohokam styles, ceramic "Yuman bow pipes," ceramic rattles, miniature pottery, various cobble-based tools (e.g., scrapers, choppers, hammerstones), bone awls, manos and metates, mortars and pestles, and Desert Side-Notched (more common) and Cottonwood Series projectile points.

#### Ethnohistory

The Project Area is located within traditional Luiseño territory, which extended south from Orange County to approximately Carlsbad, and generally easterly to Warner's Ranch, where it intersected with Cupeño and Cahuilla territories, in northern San Diego County.

The Luiseño are the most southwesterly of the Shoshonean or Uto-Aztecan speakers. Luiseño territory encompassed much of northern San Diego and Orange Counties. Luiseño settlement systems have been carefully reconstructed on the basis of extensive ethnographic and ethnohistoric research (Bean and

Shipek 1978; Kroeber 1925; Sparkman 1908; Strong 1929; White 1963). White (1963:117) suggested that the average inland rancheria had a territory of approximately 30 square miles. He suggested that the Luiseño settlement system consisted of a series of villages or rancherias located on terraces above a valley bottom watercourse (e.g., the San Luis Rey River). The rancheria owned territory in a contiguous strip leading from the valley bottom to upland areas. This vertical pattern of rancheria territory facilitated gathering plant foods through the year. In early spring, tubers and berries first ripened along the watercourse below the rancheria. As spring turned to summer, chaparral plants near the rancheria became ripe. Later, those at a higher elevation above the rancheria ripened. In fall, the people moved temporarily to higher elevations (e.g., Palomar Mountain) for the acorn harvest (White 1963:121).

The material culture among the ethnohistorically known Luiseño encompassed a wide range of tools made of locally available and also imported materials. A simple shoulder-height bow for hunting was made of mesquite or willow. Arrows had either fire-hardened wood or flaked stone points. Numerous other flaked stone tools were made including scrapers, choppers, flake-based cutting tools, and bifacial knives. Preferred stone types were locally available metavolcanics, quartz, and chert. Obsidian was imported from the deserts to the north and east. Ground stone objects include mortars and pestles typically made of fine-grained granite. Mortars are associated with grinding acorns, although a variety of other materials were processed in them as well (Yohe et al. 1991). Simple basin metates and cobble manos were also used for grinding grass seeds and other items. Shaped metates were not known until the arrival of the Spanish (Kroeber 1925:653; Sparkman 1908:208). The manufacture and use of native ceramic vessels were also common and was used in part by True (1993), and True and Waugh (1981, 1982, 1983) to distinguish the pre-ceramic San Luis Rey I period from the later San Luis Rey II period.

### Historic Period

The Spanish Period in Alta California (1769–1821) represents a time of European exploration and settlement. Military and religious contingents established the San Diego Presidio and the San Diego Mission in 1769. In 1798, Mission San Luis Rey de Francia was founded on the San Luis Rey River in the present-day city of Oceanside. The mission system also introduced horses, cattle, sheep, and agricultural goods and implements as well as new construction methods and architectural styles.

During the Mexican Period (1821–1848), the missions were secularized, opening vast tracts of former mission lands for private use and settlement. The numerous grants dramatically expanded the rancho system. The southern California economy became increasingly based on cattle ranching. The Project Area is located south-southwest of the former Rancho Pauma, granted to Juan María Marrón in 1843 (Pourade 1969), northwest of Rancho Guejito y Cañada de Palomia, granted to José María Orozco in 1845, and north of Rancho Rincon del Diablo, granted in 1843 to Juan Bautista Alvarado. The Mexican Period concluded when Mexico signed the Treaty of Guadalupe Hidalgo on February 2, 1848, ending the Mexican-American War (1846–1848; Rolle 1998).

The great influx of Americans and Europeans, beginning with the Gold Rush in the summer of 1848, eliminated many remaining vestiges of traditional Native American culture. The American homestead system encouraged settlement beyond the coastal plain into areas where Indians had retreated to avoid the worst of Spanish and Mexican influences (Carrico 1987; Cook 1976).

Valley Center was founded with the establishment of “Valley” Post Office on October 22, 1874. A year later, however, the office was closed for lack of a postmaster. A new Post Office was established a mile and a half to the north as “Valley Center” on November 11, 1885 (Salley 1991:221). A small town site grew



up at this location consisting of around a half dozen buildings that included a general store and blacksmith shop (Davis 1955). The community benefited from being on the main road from San Diego to San Bernardino and Riverside. The inland Mail Company began business in July 1886 and ran “triweekly” stages carrying passengers, mail, and packages from San Diego to Temecula, stopping at Poway, Bernardo, Escondido, Valley Center, and Pala. Coaches left on Mondays, Wednesdays, and Fridays and arrived at Temecula on the same evening of those days.

Homesteaders and farmers in the region found initial success in grain cultivation. During initial settlement, pioneer farmers needed a product that could be quickly and cheaply produced. It would not be until after 1955, when Colorado River water supplied by the Metropolitan Water District to the Valley Center Municipal Water District and stored at the Lilac Reservoir, that larger scale agriculture could take place (Robbins-Wade et al. 2017; Valley Center History Museum 2020). Today, Valley Center continues as part of the unincorporated rural expression of the County of San Diego.

### **1.2.2      Records Search Results**

A records search request through the California Historical Resources Information System (CHRIS) was conducted by staff at the South Coastal Information Center (SCIC) on November 20, 2019. The record search area included the APE along with a 0.5-mile radius surrounding buffer. As part of this study, the following resources were reviewed: the California Archaeological Inventory Records, National Register of Historic Places, California Historic Landmark Registry, California Points of Historical Interest, and the Inventory of Historic Structures. Additionally, all relevant historic maps, an in-house review of historic aerial photographs, previously recorded archaeological site records, and previously conducted surveys for past projects were reviewed. The results of the CHRIS records search are summarized below and included in Appendix A.

The CHRIS records search identified 27 previously recorded cultural resources located within 0.5 mile of the APE; eight were mapped within the APE. The results are summarized below in Table 1.

**Table 1: Previously Recorded Cultural Resources in the APE Plus 0.5-Mile Radius**

Primary Number	Trinomial	Year Recorded	Resource Description and Dimensions	Relationship to Project Area
P-37-000759	CA-SDI-000759	1983	Historic and Prehistoric site with bedrock milling features and the remains of a historic adobe structure. Dimensions are 120m N-S, 65m E-W	Within APE
P-37-007200	CA-SDI-007200	1979	Prehistoric site with bedrock milling features approx. 70m <sup>2</sup>	Not within APE
P-37-010459	CA-SDI-010459	1986	Prehistoric site with a single milling slick.	Not within APE
P-37-010460	CA-SDI-010460	1986	Prehistoric site with bedrock milling features measuring 8,400m <sup>2</sup>	Not within APE
P-37-010461	CA-SDI-010461	1985	Prehistoric site with an isolated milling feature, 3m <sup>2</sup>	Not within APE

**Table 1: Previously Recorded Cultural Resources in the APE Plus 0.5-Mile Radius**

Primary Number	Trinomial	Year Recorded	Resource Description and Dimensions	Relationship to Project Area
P-37-010465	CA-SDI-010465	1985	Prehistoric village site with 120 milling elements, pottery and lithic debitage, 10,000m <sup>2</sup>	Not within APE
P-37-010466	CA-SDI-010466	1985	Prehistoric petroglyph, 25m <sup>2</sup>	Not within APE
P-37-010483	CA-SDI-010483	1986	Prehistoric site with bedrock milling features, 20m <sup>2</sup>	Not within APE
P-37-010557	CA-SDI-010557	1986	Prehistoric site with bedrock milling features, 5,800m <sup>2</sup>	Not within APE
P-37-010891	CA-SDI-010891	1987	Prehistoric site with bedrock milling features and a pictograph, 130m <sup>2</sup>	Not within APE
P-37-010892	CA-SDI-010892	1987	Prehistoric site is a temporary camp with bedrock milling features, dimensions not provided.	Not within APE
P-37-012637	CA-SDI-012637	1993	Prehistoric site with bedrock milling features, 4m <sup>2</sup>	Not within APE
P-37-012638	CA-SDI-012638	1992	Prehistoric site with bedrock milling features, 20m <sup>2</sup>	Not within APE
P-37-013583	CA-SDI-013583	N/A	Prehistoric site with bedrock milling features, 550m <sup>2</sup>	Not within APE
P-37-013584	CA-SDI-013584	1993	Prehistoric site with bedrock milling features, 1,700m <sup>2</sup>	Not within APE
P-37-013586	CA-SDI-013586	1993	Prehistoric site with bedrock milling features with three distinct loci, 6,795m <sup>2</sup>	Not within APE
P-37-014080	N/A	1994	Historic fire station building	Not within APE
P-37-015150	CA-SDI-I452	1992	Prehistoric isolate, metavolcanics flake	Not within APE
P-37-015414	CA-SDI-716	1993	Prehistoric isolate, grey felsite flake	Within APE
P-37-017525	N/A	1999	Historic isolate, vent hole milk can	Within APE
P-37-017526	N/A	1999	Prehistoric isolate, quartz flake	Within APE
P-37-017527	CA-SDI-015358	1999	Prehistoric site with lithic scatter and bedrock milling features, 3,416m <sup>2</sup>	Within APE

**Table 1: Previously Recorded Cultural Resources in the APE Plus 0.5-Mile Radius**

Primary Number	Trinomial	Year Recorded	Resource Description and Dimensions	Relationship to Project Area
P-37-030999	CA-SDI-019674	2009	Prehistoric site with bedrock milling, debitage scatter and pottery, 5,200m <sup>2</sup>	Within APE
P-37-031002	CA-SDI-019677	2009	Prehistoric site with bedrock milling features, 100m <sup>2</sup>	Within APE
P-37-033119	CA-SDI-020856	2013	Multicomponent site with lithic scatter, marine shell and remnants of historic fence and rock wall, 1,250m <sup>2</sup>	Within APE
P-37-033120	CA-SDI-020858	2013	Prehistoric site with a bedrock milling feature, 15m <sup>2</sup>	Within APE
P-37-035928	CA-SDI-021887	2016	Prehistoric site with a bedrock milling feature and debitage scatter, 20m <sup>2</sup>	Not within APE

Lastly, the in-house review of aerial photographs did not indicate the presence of any historic buildings within the APE.

### Previous Studies

The records search results indicate that 25 previous cultural resource investigations have been conducted within 0.5-mile radius of the APE. Three of these studies include the current Project Area. Details pertaining to the investigations are listed below in Table 2.

**Table 2: Prior Cultural Resources Studies within 0.5 mile of the Area of Potential Effect (APE)**

SCIC Report Number	Author/Company	Year	Study Title	Relationship to Project Area
SD-00351	Carrico, Richard	1975	Archaeological Survey of the Proposed Valley Center Commercial Development	Not within APE
SD-00593	Chace, Paul	1984	A Cultural Resources Survey for the Central Valley Center Sewer SWCB Project No. C-06-1567	Within APE
SD-00765	Chace, Paul, and Donna Collins	1987	1987 Addendum, A Cultural Resources Survey for the Central Valley Center Sewer	Within APE
SD-01838	Chace, Paul	1979	The Archaeology of the Sulsberger Property, Valley Center (TPM#15611)	Not within APE
SD-02327	Gallegos, Dennis, and Carolyn Kyle	1992	Historical/Archaeological Survey Report for the Proposed Valley Center Sewage and Water Reclamation Facilities-Valley Center, CA	Not within APE

**Table 2: Prior Cultural Resources Studies within 0.5 mile of the Area of Potential Effect (APE)**

SCIC Report Number	Author/Company	Year	Study Title	Relationship to Project Area
SD-02785	Brown, John	1993	Archaeological Testing and Significance Assessment of Three Prehistoric Sites Located in Valley Center, San Diego County, California	Not within APE
SD-03574	Wahoff, Tanya L. and Rebecca M. Apple	1999	Cultural Resources Inventory and Evaluation for the Proposed 69/12kV Valley Center Substation, San Diego, California	Not within APE
SD-04435	Mooney, Brian F.	1990	Cultural Resource Survey and Significance Evaluation for the Khoja Property, Valley Center	Not within APE
SD-07729	Foster, Daniel G., and Mark Thornton	2000	Management Plan for CDF's Historic Buildings and Archaeological Sites	Within APE
SD-07751	Thornton, Mark	1994	A Survey and Historic Significance Evaluation CDF Building Inventory	Not within APE
SD-08124	Wright, Gail	2003	Negative Cultural Resources Survey Report for STP 02-071; Log No. 02-08-068; Sreckovic Site Plan APN 188-250-14	Not within APE
SD-08352	Wright, Gail	2003	Negative Cultural Resources Survey Report for STP 03-021 ER 03-08-014 Automotive Specialty, Valley Center, APN 188-250-14	Not within APE
SD-08495	Wright, Gail	2003	Negative Cultural Resources Survey Report for STP 03-026; Log No. 03-08-029 Lizard Rock APN 188-250-41	Not within APE
SD-10544	Wright, Gail	2007	Cultural Resources Survey Report for: TMP 20820, Log No. 04-08-016-Souris Minor Subdivision, APN 189-012-68-00, Negative Findings	Not within APE
SD-10960	Wright, Gail	2003	Negative Cultural Resources Survey Report For STP 03-021 ER 03-08-014 - Automotive Specialty, Valley Center; APN 188-250-14	Not within APE
SD-12534	Bonner, Wayne, and Sarah Williams	2009	Cultural Resource Records Search Results And Site Visit For Cricket Communications Candidate San-259 (Paradise Pet Clinic), 29277 Valley Center Road, Valley Center, San Diego County, California	Not within APE
SD-14654	Roy, Julie	2013	Letter Report: Ets 26452- Cultural Resources Survey For Pole P113399, Community Of Valley Center, Northern San Diego County, California- Io 7011102	Not within APE



**Table 2: Prior Cultural Resources Studies within 0.5 mile of the Area of Potential Effect (APE)**

SCIC Report Number	Author/Company	Year	Study Title	Relationship to Project Area
SD-14937	Long, Brady	2014	Letter Report: Ets 26452- Cultural Resources Monitoring Report For The Removal Of Pole P113399, Valley Center, San Diego County, California- Io7011102	Not within APE
SD-15678	Smith, Brian F.	2015	A Negative Cultural Resources Survey Report for the Weston-Valley Center Commercial Project, San Diego County, California (PDS2013-STP-13-029; Environmental Log No. PDS2014-ER-14-08-001)	Not within APE
SD-15749	Amy Gusick and Kristin Tennesen	2014	Cultural Resources Technical Report: Valley Center Municipal Water District North Village Wastewater Infrastructure Project	Not within APE
SD-16363	Roy, Julie	2014	Letter Report: Ets 28640 - Cultural Resources Survey For Removal Activities For Pole P113398, Community Of Valley Center, San Diego County, California - Io 7011102	Not within APE
SD-16700	Cox, Nara and Chimiel, Karolina	2015	Ets 30043 - Cultural Resources Survey For The Firm C1030 Section U Reconductor Project, Valley Center, San Diego County, California (Io 7071280)	Not within APE
SD-17370	Cooley, Theodore	2018	Letter Report: Ets 35928 - Cultural Resources Monitoring Report For Vegetation Management SDWP Intrusive Inspections, San Diego County, California - Io 29109	Not within APE
SD-17507	Cooley, Theodore	2018	Letter Report: SDG&E Ets # 35928 - Cultural Resources Survey For Intrusive Inspection Program, Anza Borrego Desert State Park, San Diego County, California - Io 29109	Not within APE

### Previously Recorded Sites Adjacent to the APE

The records search results indicate that 25 resources are identified outside the boundaries of the Project Area, within a 0.5-mile radius. Nineteen are described as prehistoric archaeological sites, four as prehistoric isolates, one as an historic and prehistoric site, one as an historic building, and one as an historic isolate (Table 1). Of the 19 prehistoric sites, 10 are recorded as bedrock milling stations, 6 are identified as bedrock milling stations with one or more lithics, 1 as a bedrock milling station with lithics and ceramics, 1 as a bedrock milling station and rock art, and 1 as a rock art locality. The historic building was identified as the Valley Center Forest Fire Station and associated buildings dating between 1938 and 1949. The dual component site is recorded as a sparse scatter of quartz debitage and marine shell with a nearby stone perimeter wall, which was recommended as not significant.

### **1.3 APPLICABLE REGULATIONS**

Resource importance 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, and culture. A number of criteria are used in demonstrating resource importance. Specifically, criteria outlined in the California Environmental Quality Act (CEQA), Resource Protection Ordinance (RPO), and the San Diego County Local Register (Local Register) provide the guidance for making such a determination. The following sections detail the criteria that a resource must meet in order to be determined important.

#### **1.3.1 California Environmental Quality Act**

According to CEQA (§15064.5a), the term “historical resource” includes the following:

- (1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Public Resources Code §5024.1, Title 14 CCR, Section 4850 et seq.).
- (2) A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements of section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- (3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the California Register of Historical Resources (Public Resources Code §5024.1, Title 14, Section 4852) including the following:
  - (A) Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
  - (B) Is associated with the lives of persons important in our past;
  - (C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values;  
or
  - (D) Has yielded, or may be likely to yield, information important in prehistory or history.
- (4) The fact that a resource is not listed in, or determined eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting

the criteria in section 5024.1(g) of the Public Resource Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code section 5020.1(j) or 5024.1.

According to CEQA (§15064.5b), a project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. CEQA defines a substantial adverse change as:

- (1) Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.
- (2) The significance of an historical resource is materially impaired when a project:
  - (A) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources;
  - (B) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
  - (C) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

Section 15064.5 8 of CEQA applies to effects on archaeological sites and contains the following additional provisions regarding archaeological sites:

- (1) When a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource, as defined in subsection (a).
- (2) If a lead agency determines that the archaeological site is an historical resource, it shall refer to the provisions of Section 21084.1 of the Public Resources Code, and this section, Section 15126.4 of the Guidelines, and the limits contained in Section 21083.2 of the Public Resources Code do not apply.
- (3) If an archaeological site does not meet the criteria defined in subsection (a) but does meet the definition of a unique archaeological resource in Section 21083.2 of the Public Resources Code, the site shall be treated in accordance with the provisions of section 21083.2. The time and cost limitations described in Public Resources Code Section 21083.2 (c-f) do not apply to surveys and site evaluation activities intended to determine whether the project location contains unique archaeological resources.

- (4) If an archaeological resource is neither a unique archaeological nor an historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment. It shall be sufficient that both the resource and the effect on it are noted in the Initial Study or EIR, if one is prepared to address impacts on other resources, but they need not be considered further in the CEQA process.

Section 15064.5 (d) & (e) contain additional provisions regarding human remains. Regarding Native American human remains, paragraph (d) provides:

(D) When an initial study identifies the existence of, or the probable likelihood, of Native American human remains within the project, a lead agency shall work with the appropriate Native Americans as identified by the Native American Heritage Commission as provided in Public Resources Code §5097.98. The applicant may develop an agreement for treating or disposing of, with appropriate dignity, the human remains and any items associated with Native American burials with the appropriate Native Americans as identified by the Native American Heritage Commission. Action implementing such an agreement is exempt from:

- (1) The general prohibition on disinterring, disturbing, or removing human remains from any location other than a dedicated cemetery (Health and Safety Code Section 7050.5).
- (2) The requirement of CEQA and the Coastal Act.

### **1.3.2 San Diego County Local Register of Historical Resources**

The County requires that resource importance be assessed not only at the State level, as required by CEQA, but at the local level as well. If a resource meets any one of the following criteria as outlined in the Local Register, it will be considered an important resource.

- (1) Is associated with events that have made a significant contribution to the broad patterns of San Diego County's history and cultural heritage;
- (2) Is associated with the lives of persons important to the history of San Diego County or its communities;
- (3) Embodies the distinctive characteristics of a type, period, San Diego County region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- (4) Has yielded, or may be likely to yield, information important in prehistory or history.

### **1.3.3 San Diego County Resource Protection Ordinance**

The County of San Diego's RPO protects significant cultural resources. The RPO defines "Significant Prehistoric or Historic Sites" as follows:

Sites that provide information regarding important scientific research questions about prehistoric or historic activities that have scientific, religious, or other ethnic value of local, regional, State, or federal importance. Such locations shall include, but not be limited to:



- (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 National Register of Historic Places by the keeper of the National Register; 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 and 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 Indian Religious Freedom Act or Public Resources Code Section 5097.9, such as burial(s), 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.

The RPO does not allow nonexempt activities or uses damaging to significant prehistoric or historic lands on properties under County jurisdiction. The only exempt activity 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. Noncompliance would result in a project that is inconsistent with County standards.

## **SECTION 2.0 – GUIDELINES FOR DETERMINING SIGNIFICANCE**

For the purposes of this technical report, any of the following will be considered a potentially significant environmental impact to cultural resources:

- (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 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 formal cemeteries.
- (4) The project proposes activities or uses damaging to significant cultural resources as defined by the RPO and fails to preserve those resources.

The significance 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 cultural resources are protected under the RPO. 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 RPO does not allow non-exempt activities or uses damaging to significant prehistoric lands on properties under County jurisdiction. The only exempt activity 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). Noncompliance would result in a project that is inconsistent with County standards.

## **SECTION 3.0 – ANALYSIS OF PROJECT EFFECTS**

### **3.1 METHODS**

#### **3.1.1 Survey Methods**

##### **November 27, 2019 Survey**

Chambers Group Archaeologist Lucas Tutschulte conducted an intensive pedestrian survey of the 8.93-acre Project site on November 27, 2019. Option A of the underground 69kV gen-tie alignment of the Project Area, which will interconnect with the SDG&E 69kV Valley Center Substation facility to the northeast, was also surveyed. Additionally, a Native American monitor, Banning Taylor with Saving Sacred Sites, was present and involved throughout the survey effort. The intensive-level survey consisted of systematic surface inspection of all accessible areas with transects walked at 15-meter intervals or less to ensure that all surface-exposed artifacts and cultural resources could be identified. Mr. Tutschulte and Mr. Taylor examined the ground surface for the presence of prehistoric artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools), historical artifacts (e.g., metal, glass, ceramics), sediment discoloration that might indicate the presence of a cultural midden, roads and trails, and depressions and other features that might indicate the former presence of structures or buildings (e.g., post holes, foundations). Ground disturbances such as burrows were visually inspected for both cultural resources and paleontological resources. Photographs of the Project Area were taken using a digital camera, and data were recorded using a handheld sub-meter accurate Global Positioning System (GPS) unit. Field notes, photographs, and records related to the November 27, 2019 survey are on file at the Chambers Group office in San Diego, California.

##### **April 27, 2020 Survey**

On April 27, 2020 Chambers Group archaeologists Richard Shultz and Martin Jorgensen conducted a Phase I survey of 15.1 acres along Valley Center Road and within SDG&E's property, encompassing all proposed alignment options that are currently being considered and evaluated for the Project gen-tie line. Banning Taylor from Saving Sacred Sites was also present for the survey. The intensive pedestrian survey consisted of systematic surface inspection of all accessible areas with transects walked at 15-meter intervals or less to ensure that all surface-exposed artifacts and sites could be identified. All protocols and practices used in the November 27, 2019 survey were used for this field effort. Field notes, photographs, and records related to the April 27, 2020 survey are on file at the Chambers Group office in San Diego, California.

#### **3.1.2 Site Delineation Methods**

Chambers Group Geographic Information System (GIS) staff plotted a series of STP locations at 5-meter intervals in areas outside the recorded P-37-000759 boundaries, which were buffered and deemed part of an environmentally sensitive area (ESA) within the Project site. The STP locations extended 15 to 20 meters beyond the ESA setback, and into the Project development footprint. The purpose of the STPs was to identify any subsurface evidence of archaeological site materials beyond the previously identified and mapped archaeological site boundaries. The STP locations were located in the field using submeter-enabled GPS technology and identified with a grid coordinate number with an off-site datum, resulting in positive numeric Northings and Eastings for each STP address (e.g., 55N/60E).

Each 30- by 30-centimeter STP was excavated with a round-nose shovel in approximately 20-centimeter levels. Data were recorded with electronic tablets using ESRI Survey 123 software, with daily paper files maintained for tracking purposes. Photographs of each completed STP were also taken with the tablets and stored in Survey 123 files. Excavation took place between March 31, and June 2, 2020 as permitted by weather and schedules.

### **3.1.3      Laboratory and Cataloging Procedures**

Artifacts were not collected in the field. The intent of the STP program was strictly to identify presence or absence of cultural materials rather than to evaluate the CRHR eligibility of the site. Artifacts recovered during the survey were identified and photographed in the field, then returned to the same level and STP from which they were recovered.

### **3.1.4      Artifact Conveyance**

Since no artifacts were removed from the field, neither curation nor artifact repatriation was necessary.

### **3.1.5      Native American Participation/Consultation**

Chambers Group requested a SLF search from the NAHC. The NAHC responded on March 23, 2020 and indicated that their files did not list any known resources in the immediate area. Tribal scoping letters were sent to all addresses provided by the NAHC on April 29, 2020. A response was received by the Rincon Band of Luiseno Indians on May 8, 2020. Correspondence with the NAHC and tribes is included in Confidential Appendix B.

A Native American monitor from Saving Sacred Sites participated in all fieldwork for the intensive pedestrian survey and STP program.

### **3.1.6      Aerial Photograph Analysis**

Analysis of aerial photographs dating between 1946 and 2010 indicated both extensive and intensive changes to the Project Area landscape and land use. Aerial photographs dating to 1946 and 1953 indicate that a pathway had been cut around the base of the knoll in the northwestern portion of the Project site is the same as can be currently seen along the southern margins of the Locus A-1 and Locus A-2. This same dirt pathway extends along the north of the Locus A-3. Both Locus A-3 and the mapped area described as Locus A-4 appear to be within an orchard grove during this period. Between 1946 and 1989 a building can be seen in the area of Locus A-2 that matches the location identified as a barn and corral as mapped by Chase (1986) and Wahoff and Underwood (1998). By 1964 the orchard had been removed, and the eastern portion of the Project site appears to have been graded. By 1971 two small outbuildings and a tree are situated at the location of Locus A-4, and sometime between 1980 and 1989 the detention basin to the southwest was excavated. The 1980, 1995, and 1996 aeriels appear to indicate that very little native vegetation was extant on any of the landforms within the Project site. Additionally, the 2002 aerial indicates that most of the Project site had been cleared or was in agricultural use and clearing of regrown vegetation around Locus A-1 and Locus A-2 can be observed. It appears that after 2010 the agricultural use of the land ceased, and native vegetation began to reoccupy previously utilized and cleared lands.

## **3.2 RESULTS**

### **3.2.1 Survey Results**

#### **November 27, 2019 Survey**

Records search data returned from the SCIC indicated that two resources were located within the APE south of Valley Center Road (P-37-000759 and P-37-030999) (Table 3). Chambers Group Archaeologist Lucas Tutschulte and Saving Sacred Sites Native American monitor Banning Taylor conducted an intensive pedestrian survey of the Project site. The Project site is located south of Valley Center Road within an open fallow field with evidence of previous agricultural activity. A barbed wire and a newer chain-link fence delineate the eastern, southern, and portions of the northern boundary of the Project site. The western margin is bound and impacted by a large retaining wall and an adjacent residential development. The northern portion of the Project site is situated atop a slight knoll and is characterized by a 10- to 15-degree slope with a southwestern aspect. The elevated north and northeast area slopes to the lower-lying, generally flat southern portion of the Project site. This southern portion has been more impacted by previous agricultural activity. Ground surface visibility within the Project site was fair, with mustard, buckwheat, and various medium to high grasses limiting ground surface visibility to approximately 20 to 50 percent. In addition to obvious signs of previous agricultural activity in the APE, multiple vehicle and heavy equipment tracks are visible throughout the area, particularly in the north and northeast. Additional evidence of disturbance results from an existing SDG&E overhead electric transmission line and associated access road collocated with the western and northern boundary of the Project site. Option A of the underground 69kV gen-tie alignment of the APE was surveyed and observed as previously disturbed. The corridor for the Option A gen-tie alignment is already occupied by underground utilities and is regularly cleared and maintained by SDG&E. Ground surface visibility was 90 to 100 percent, and no cultural resources were observed in that portion of the APE.

During the survey, the two previously recorded cultural resources mapped within the Project site, P-37-030999 and P-37-000759, were relocated and observed in similar condition as previous records indicated. Details pertaining to these resources are presented below. Department of Parks and Recreation (DPR) continuation forms from the California Office of Historic Preservation were prepared for the archaeological site updates and will be submitted to the SCIC.

#### **April 27, 2020 Survey**

Records search data returned from the SCIC indicated that seven resources were located within or immediately adjacent to the APE north of Valley Center Road (Table 3). Two of these (P-37-033119, and P-37-033120) were included in the records search due to data mismanagement at the SCIC. Site location data within the site forms conclusively demonstrate that these resources are not within or immediately adjacent to the APE. Of the five remaining resources, three (P-37-017525, -017526, and -017527) are likely to have been destroyed by construction of the SDG&E Valley Center Substation. Of the last two resources, the isolated flake (P-37-015414) was not relocated; isolated items are often difficult to relocate. Isolates, by their nature, are not significant resources under CEQA. Lastly, archaeological site P-37-031002 was relocated and found to be in the same condition as previously recorded. No additional resources were identified during the April 27, 2020 survey.



**Table 3: Archaeological Sites Previously Recorded within APE**

Primary Number	Description	Survey Result Status
P-37-000759	Bedrock milling and artifact scatter across several loci	Located within APE
P-37-030999	Bedrock milling and artifact scatter	Located within APE
P-37-015414	Isolated Flake	Unable to locate during survey
P-37-017525	Isolated Matchstick Filler Can	Not relocated and presumed destroyed during construction of SDG&E substation
P-37-017526	Isolated Flake	Not relocated and presumed destroyed during construction of SDG&E substation
P-37-017527	Bedrock milling and lithic scatter	Not relocated and presumed destroyed during construction of SDG&E substation
P-37-031002	Bedrock milling feature	Located within APE. No changes noted to archaeological site
P-37-033119	Lithic and shell scatter with historic-period stone and mortar wall/foundation	Not located within APE
P37-033120	Bedrock milling feature	Not located within APE

The portion of the APE encompassing the SDG&E property has undergone substantial changes as a result of the development of the SDG&E substation, and a haul road used to access a pole line at the southern end of the parcel. Historic aerial research indicates that these features were installed between 1996 and 2002. Areas of the SDG&E property along the southwest and the northeast include moderately steep slopes and granitic bedrock. These areas are chaparral covered and appear to have been minimally disturbed; however, non-slope areas were in orchard or farmland production during the 1940s and 1950s; the southern portion continued in orchard use until 1980. Option D is within the Valley Center Road ROW and has been highly impacted and disturbed due to road development.

### **3.2.2 Shovel Test Pit Results**

Within the APE, three loci of P-37-000759 have been previously identified (Chase 1986; Wahoff and Underwood 1998). These loci were relocated during the November 2019 Project survey and corrected as to their location from the positions identified by the SCIC. Deriving exact location data from pre-GPS era surveys can, in some instances, be challenging due to recording limitations of the day, such as the inexactitude of plotting small area resources on 1:24,000 scale topographic maps.

Chace (1986) identified the loci on the Project site as part of his Locus A, but he did not subdivide groups of outcrops into enumerated subloci. For the sake of convenience, each group of outcrops, which had been mapped as separate subloci without identification by the SCIC, were given a sublocus identification. A left-to-right ascending alpha numeric was assigned to the four excavation areas. Thus, the westernmost sublocus was assigned A-1, and the easternmost was assigned A-4. As noted above, only three loci of P-37-000759 have been previously identified within the Project site. In an abundance of caution, because it was mapped in the SCIC's GIS files as being within the private parcel immediately to the north, a fourth area of excavation (A-4) was located in order to identify any potential culturally related materials that may have extended into the Project site. The results of the STP delineation are summarized in Table 4 below and in Confidential Appendix C. Excavation of STPs took place between March 31, and June 2, 2020 as permitted by weather and schedules. No artifacts were collected during the STP excavations. A total of

four artifacts were recovered and recorded, but were returned to the STPs in the level from which they were recovered.

**Table 4: STP Results by Locus**

Locus A-1 (West)				
Location	Complete	Depth (CM)	Result	Note
55N/15E	Yes	40	Negative	Added due to positive STP at 60N/20E
60N/15E	Yes	40	Negative	
65N/15E	Yes	40	Negative	
70N/15E	Yes	40	Negative	
75N/15E	Yes	40	Negative	
80N/15E	Yes	20	Negative	Formation clays
85N/15E	Yes	20	Negative	Formation clays
55N/20E	Yes	40	Negative	Added due to positive STP at 60N/20E
60N/20E	Yes	45	Positive	FGM flake frag. Excavated to formation clays
65N/20E	Yes	40	Negative	
70N/20E	Yes	40	Negative	
75N/20E	Yes	40	Negative	
80N/20E	Yes	20	Negative	Formation clays
85N/20E	Yes	20	Negative	Formation clays
90N/20E	Yes	20	Negative	Formation clays
55N/25E	Yes	40	Negative	
60N/25E	Yes	40	Negative	
65N/25E	Yes	40	Negative	
70N/25E	Yes	40	Negative	
75N/25E	Yes	40	Negative	
50N/30E	Yes	40	Negative	
55N/30E	Yes	40	Negative	
60N/30E	Yes	40	Negative	
65N/30E	Yes	40	Negative	
50N/35E	Yes	40	Negative	
55N/35E	Yes	40	Negative	
60N/35E	Yes	40	Negative	
50N/40E	Did not place			Very large bush
55N/40E	Yes	40	Negative	
60N/40E	Yes	40	Negative	
50N/45E	Yes	40	Negative	
55N/45E	Yes	40	Negative	
60N/45E	Yes	40	Negative	
50N/50E	Yes	40	Negative	
55N/50E	Yes	40	Negative	
60N/50E	Yes	40	Negative	
50N/55E	Yes	40	Negative	
55N/55E	Yes	20	Negative	
60N/55E	Yes	40	Negative	
55N/60E	Yes	40	Negative	

**Table 4: STP Results by Locus**

Locus A-2 (Middle West)				
Location	Complete	Depth (CM)	Result	Note
40N/60E	Yes	30	Negative	Added to assess area around positive STP 45N/70E
45N/60E	Yes	40	Negative	Added to assess area around positive STP 45N/70E
40N/65E	Yes	40	Negative	Added to assess area around positive STP 45N/70E
45N/65E	Yes	15	Negative	Added to assess area around positive STP 45N/70E
50N/65E	Yes	40	Negative	
35N/70E	Yes	40	Negative	
40N/70E	Yes	40	Negative	
45N/70E	Yes	50	Positive	Burned small mammal bone, FGM flake frag, clear plate glass
50N/70E	Yes	40	Negative	Added to assess area around positive STP 45N/70E
30N/75E	Did not excavate			Redundant
35N/75E	Yes	40	Negative	
40N/75E	Yes	40	Negative	
45N/75E	Yes	40	Negative	
50N/75E	Yes	20	Negative	Added to assess area around positive STP 45N/70E
30N/80E	Did not excavate			Redundant
35N/80E	Yes	40	Negative	
40N/80E	Yes	40	Negative	
30N/85E	Yes	40	Negative	
35N/85E	Yes	40	Negative	
40N/85E	Yes	40	Negative	
30N/90E	Yes	40	Negative	
35N/90E	Yes	20	Negative	Bedrock
25N/95E	Yes	40	Negative	
30N/95E	Yes	40	Negative	
35N/95E	Yes	40	Negative	
25N/100E	Yes	40	Negative	
30N/100E	Yes	8	Negative	Large dia. Pipe obstruction
35N/100E	Yes	40	Negative	
25N/105E	Yes	40	Negative	
30N/105E	Yes	40	Negative	
35N/105E	Yes	40	Negative	
25N/110E	Yes	40	Negative	
30N/110E	Yes	40	Negative	
35N/110E	Yes	40	Negative	
30N/115E	Yes	40	Negative	

**Table 4: STP Results by Locus**

Locus A-3 (Middle East)				
Location	Complete	Depth (CM)	Result	Note
15N/130E	Did not excavate			Redundant
20N/130E	Yes	40	Negative	
25N/130E	Yes	40	Negative	
10N/135E	Did not excavate			Redundant
15N/135E	Yes	40	Negative	
20N/135E	Yes	40	Negative	
25N/135E	Yes	40	Negative	
30N/135E	Yes	40	Negative	
5N/140E	Yes	40	Negative	
10N/140E	Yes	40	Negative	
15N/140E	Yes	40	Negative	
20N/140E	Yes	40	Negative	
25N/140E	Yes	40	Negative	
5N/145E	Yes	40	Negative	
10N/145E	Yes	40	Negative	
15N/145E	Yes	40	Negative	
5N/150E	Yes	40	Negative	
10N/150E	Yes	40	Negative	
15N/150E	Yes	40	Negative	
10N/155E	Did not excavate			Redundant
15N/155E	Yes	40	Negative	
20N/155E	Yes	40	Negative	
10N/160E	Yes	40	Negative	
15N/160E	Yes	40	Negative	
20N/160E	Yes	40	Negative	
25N/160E	Yes	40	Negative	
30N/160E	Yes	40	Negative	
10N/165E	Yes	40	Negative	
15N/165E	Yes	40	Negative	
20N/165E	Did not excavate			Redundant
25N/165E	Yes	40	Negative	
30N/165E	Yes	40	Negative	
35N/165E	Yes	55	Negative	
20N/170E	Yes	40	Negative	
25N/170E	Yes	40	Negative	
30N/170E	Yes	40	Negative	
35N/170E	Did not excavate			Redundant
Locus A-4 (East)				
Location	Complete	Depth (CM)	Result	Note
40N/195E	Yes	40	Negative	Moved to 39N
35N/200E	Yes	40	Negative	
40N/200E	Yes	40	Negative	
35N/205E	Yes	40	Negative	
40N/205E	Yes	40	Negative	
45N/205E	Did not excavate			Fence
40N/210E	Yes	40	Negative	
45N/210E	Yes	40	Negative	Moved to 43N
45N/215E	Did not excavate			Tree
45N/220E	Yes	40	Negative	
40N/225E	Yes	40	Negative	

**Table 4: STP Results by Locus**

45N/225E	Yes	30	Negative	Roots
35N/230E	Yes	40	Negative	
40N/230E	Yes	40	Negative	
45N/230E	Yes	40	Negative	
50N/230E	Yes	40	Negative	
45N/235E	Yes	80	Negative	
50N/235E	Yes	40	Negative	

### Locus A-1 (Western)

A series of 39 STPs was arrayed along the western and southern identified extents of this sublocus (Photo 1, Confidential Appendix D). The western STPs were located within the least disturbed area of the slope upon which the locus is situated. This area is chaparral-covered and appears to possess an unmodified soil stratigraphy. Soil development is shallow — 10 to 15 centimeters — and overlies a decomposed granitic clay formation. The southwest and southern margins indicate previous dirt road cutting and field clearing for farming. Soil profiles indicate more developed organic decomposed granitic sandy loam layers, down to between 20 and 30 centimeters, which transition to coarser and visibly less organic decomposed granitic clayey loams. In general, the landform slopes south to southwest, and a very small number of artifacts appear to have migrated downslope. A few items were observed in road cuts along the southern and northern boundary of the locus, and a single fine-grained metavolcanic flake fragment was identified in the upper level of STP 60N/20E (Photos 2 (Confidential Appendix D) and 3). Two additional STPs — one south, and one southwest — were excavated to identify any additional material; none was identified.



Photo 3: Fine-grained metavolcanic distal flake fragment recovered in STP 60N/20E.



## **Locus A-2 (Middle West)**

A series of 33 STPs was arrayed along the southern extent of the sublocus (Photo 4, Confidential Appendix D). This area has been subject to a substantial amount of development, ranging from brush clearing for agriculture to dirt road cutting, and a cut-and-fill pad developed for a now dilapidated historic-period building and corral. In general, the array is situated in an area that is gently sloping to the south; however, there is a sharp increase of slope along the northern edge of the STP testing array. A fine-grained metavolcanic flake, a burned small mammal bone (a long bone probably from a lagomorph — hare or rabbit), and a plate glass fragment was identified in the upper level of an STP located at 45N/70E (Photo 5). This STP was located along the northern margin of a dirt road cut, just west of the base of the cut-and-fill slope associated with the building and corral pad described above (Photo 6, Confidential Appendix D). The STP was excavated to 50 centimeters, well into a yellowish brown, very clayey decomposed granitic loam. As this particular soil type was observed between 20 and 50 centimeters and is immediately adjacent to the road cut margin, it is certain that the upper 20 centimeters of sediments are part of a secondary distribution of soils and site materials that have migrated downslope from the cut-and-fill pad immediately to the north. Native soils within the road cut have been removed, exposing basal clays associated with the weathering in place geologic substructure. Several STPs arrayed around the positive STP at 45N/70E were excavated, both upslope, across, and downslope. All were negative. The shallow STP at 45N/65E was located in the dirt road cut and was terminated when the compact reddish clay subsoil was exposed. The shallow STP at 50N/75E was also located in the compact reddish clay subsoil, where it was exposed by the cutting for the corral paddock located above and to the north of the dirt road.



Photo 5: Fine-grained metavolcanic flake, plate glass fragment, and burned small mammal bone recovered from STP 45N/70E.

### **Locus A-3 (Middle East)**

As this sublocus is located almost entirely within the Project site, the STP array covered three-quarters of the locus' extent, with STPs located along the western, southern, and eastern margins (Photo 7, Confidential Appendix D). A total of 32 STPs was excavated, and none identified any subsurface deposits. The area around the sublocus is generally flat and had been previously cleared for agricultural use. The area immediately to the east had been previously graded and filled with decomposed granitics for an access road and turnaround or parking lot. The private property along the north of the locus has been developed, and construction materials and trash have migrated south onto the Project site.

### **Locus A-4 (Eastern)**

The possible eastern sublocus is projected to have been located almost entirely within the private parcel to the north of the Project site. This part of the property is generally flat and has been extensively modified by development of the parcel to the north (Photo 8, Confidential Appendix D). Additional disturbances include the grading of an access road along the east property line, an access road along the south of the supposed locus margin, and the excavation of a detention pond to the southwest. The 16 STPs used at this sublocus were arrayed along the southern extent of the possible deposit as projected. As a result of the extensive changes to landform topography in this area, it is likely that any site previously documented at this location has been destroyed by parcel development. No identified subsurface deposits or artifacts were identified at any STP, and soil profiles suggest that intact deposits are unlikely.

## **SECTION 4.0 – INTERPRETATION OF RESOURCE IMPORTANCE AND IMPACT IDENTIFICATION**

### **4.1 RESOURCE IMPORTANCE**

The County of San Diego Criteria for the Determination of Resource Importance 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 County or its communities,
3. Resources that embody the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values, and;
4. Resources that have yielded or may be likely to yield, information important in prehistory or history.

Nine previously recorded cultural resources have been identified within the APE. Site P-37-030999, located in the southwest corner of the Project site, will be avoided and protected in place through a recent redesign of the Project. As such, Site P-37-030999 has not been evaluated and is therefore assumed to be RPO significant per the County's Guidelines. Four loci associated with P-37-000759 have been recorded within or adjacent to the Project site. The Project, as proposed, may impact these loci. The remaining seven resources, described above, are not expected to be impacted by the Project (two resources [P-37-033119, P-37-033120] are mismapped by the SCIC, are not actually located within the APE; three [P-37-017525, P-37-017526, P-37-017527] have likely been destroyed during construction of the SDG&E Valley Center Substation; one [P-37-015414], an isolate, could not be relocated; and one [P-37-031002] was relocated and found not to be subject to direct impacts). The County's Guidelines for Determining Significance indicate that any archaeological site that is not evaluated for significance is assumed to be RPO significant, and as such, the remaining seven resources located in the APE but outside the Project site are assumed to be RPO significant.

Site delineation and evaluation efforts were carried out at P-37-000759 in order to identify site limits and to direct future work in avoiding direct impact to these resources. The result of this delineation identified two areas where impacts to the site cannot be avoided. This impact required an evaluation of the areas that would be disturbed through Project construction. Figure 4 (Confidential Appendix) shows the location of the positive STPs. Locus A-1 had one positive STP with one flake in it. All other STPs surrounding this one were negative and there were no signs of a feature or surface artifact scatter in the tested areas. The artifacts found in Locus A-2 included a burned small mammal bone, a broken flake, and a piece of plate glass. All other STPs surrounding this find were negative.

The artifacts noted from the two positive STPs at P-37-000759 are common artifacts and do not have any chronological or stylistic characteristics that would make them diagnostic and attributable to a time period or a specific prehistoric or historic group. They represent everyday activities of local prehistoric lifeways such as food preparation and tool creation or maintenance. As such the artifacts are unable to provide any data to support the criteria listed above. The areas of the site that were subjected to evaluation are not eligible for the County register, and not be considered an important resource.

The above analysis is limited to the positive STPs depicted in Figure 3 (Confidential Appendix). The rest of P-37-000759 may yield artifacts or features that would make the site meet the criteria and should be considered unevaluated and therefore assumed RPO significant.

It must be noted that all areas of past cultural use are of cultural importance to the Native American community, even if they do not meet the significance criteria for archaeological resources. Avoidance of impacts to cultural resources is preferred over other, more destructive, mitigation measures.

#### **4.2 IMPACT IDENTIFICATION**

The Project disturbance footprint has been designed to protect and avoid 8 of the 9 identified archaeological resources recorded on the Project site. Portions of P-37-000759 would be impacted by construction of a wall surrounding the Project equipment and facilities (with the exception of stormwater drainage and retention basins). However, the portions of the site in this area do not meet any of the eligibility criteria as a historical resource under CEQA, nor does it meet the County of San Diego criteria for a significant or important cultural resource as defined by the Resource Protection Ordinance. As such, development of the Project does not represent a significant impact. P-37-030999 is within the Project site; however, redesigns of the Project development footprint has removed any impact to the site. Temporary fencing will protect the site during Project construction and archaeological monitoring will ensure no impacts during Project construction.



**Figure 3: Shovel Test Program Results**

**Confidential Appendix**

## **SECTION 5.0 – MANAGEMENT CONSIDERATIONS – MITIGATION MEASURES AND DESIGN CONSIDERATIONS**

Potential direct impacts to archaeological resources were identified for the Project. Efforts in Project redesign and site delineation have eliminated direct impacts; mitigation measures requiring full time cultural resources monitoring will protect against direct and indirect impacts to the sites and unidentified resources.

### **5.1 MITIGATED IMPACTS**

Two of the sub-loci of P-37-000759 had positive STPs. These positive finds are removed from the main archaeological site and are surrounded by negative STPs. Project design will impact these two subloci, and thus evaluation of P-37-000759 was conducted. The deposits were found to not meet the eligibility requirements for the CRHR, local register or the RPO. Since the deposits do not meet the definition of a historical resource no mitigation is necessary. The Project Area has proven to be sensitive for the presence of archaeological deposits and, because of this, mitigation measures including temporary and protective fencing and archaeological monitoring are detailed below. These efforts will reduce potential impacts to known and previously undiscovered archaeological deposits to a level less than significant.

### **5.2 MITIGATION MEASURES AND DESIGN CONSIDERATIONS**

The Project will result in minor disturbance to archaeological deposits associated with archaeological site P-37-000795. However, these deposits have been evaluated and found to not meet the criteria as an important or significant cultural resource. The larger site area outside of the development footprint has not been evaluated at this time and is assumed RPO significant.

The general Project Area is sensitive for cultural resources and it is possible that undiscovered archaeological deposits are present which could be unearthed during ground disturbance associated with Project construction, constituting an impact to cultural resources. As such, a mitigation monitoring program will be required to include Native American and Archaeological monitors present during Project ground-disturbing activities. In addition, temporary fencing will be implemented. Full mitigation measures are provided in Section 6.

## **SECTION 6.0 – LIST OF MITIGATION MEASURES AND DESIGN CONSIDERATIONS**

Potential impacts to cultural resources may be reduced to a level below significance through archaeological site boundary identification and adoption of mitigation monitoring during ground disturbance.

### **Mitigation Measure CUL-1: Archaeological Monitoring Program**

#### **Pre-Construction**

- Contract with a County approved archaeologist to perform archaeological monitoring and a potential data recovery program during earth-disturbing activities. The Project Archaeologist shall perform the monitoring duties before (such as installation of temporary fencing), during and after construction.
- Pre-construction meeting to be attended by the Project Archaeologist and Luiseno Native American monitor to explain the monitoring requirements.

#### **Construction**

- Monitoring: Both the Project Archaeologist and Luiseno 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 Luiseno Native American monitor.
- Identified Resources. In the event that cultural resources are identified:
  - Both the Project Archaeologist and Luiseno 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 at the time of discovery.
  - The Project Archaeologist in consultation with the County Archaeologist and Luiseno 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 Luiseno 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 Luiseno 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

human remains are to be taken offsite for evaluation, they shall be accompanied by the Luiseno Native American monitor.

- If the remains are determined to be of Native American origin, the MLD, as identified by the 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.

### **Rough Grading**

- Monitoring Report. 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 the South Coastal Information Center and any culturally-affiliated tribe who requests a copy.

### **Final Grading**

- Final Report. A final monitoring 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.
- Cultural Material Conveyance
  - The final monitoring 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 Code of Federal Regulations (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.

### **Mitigation Measure CUL-2: Temporary Fencing**

Prior to any clearing, grubbing, trenching, grading, or any land disturbances:

Prepare and implement a temporary fencing plan for the protection of archaeological site(s) CA-SDI-759 (P-37-000759) and SDI-19674 (P-37-030999) during any grading activities within 10 feet (10') of these archaeological site(s), as shown on Figure 3 (Field Results) of the Confidential Appendix. The temporary fencing plan shall be prepared in consultation by a County approved archaeologist and the Luiseño Native American monitor. The fenced area shall include a buffer sufficient to protect the archaeological site(s). The fence shall be installed under the supervision of the County approved archaeologist prior to commencement of grading or brushing and be removed only after grading operations have been completed. The temporary fencing plan shall include the following requirements:

- a. Provide evidence to the Director of Planning & Development Services that the following notes have been placed on the Grading and/or Improvement Plan:



- (1) In the event that construction activities are to take place within 10 feet of archaeological site(s) CA-SDI-759 (P-37-000759) and SDI-19674 (P-37-030999) the temporary fencing plan shall be implemented under the supervision of a County approved archaeologist that consists of the following:
- The project archaeologist shall identify the site boundaries.
  - The project archaeologist shall determine an adequate buffer for the protection of the site(s) in consultation with the County archaeologist and the Luiseno Native American monitor.
  - Upon approval of buffers, install fencing under the supervision of the project archaeologist.
  - Submit to Planning & Development Services for approval, a signed and stamped statement from a California Registered Engineer, or licensed surveyor that temporary fences have been installed in all locations of the project where proposed grading or clearing is within 10 feet of the archaeological site(s), CA-SDI-759 (P-37-000759) and SDI-19674 (P-37-030999).
  - Fencing may be removed after the conclusion of construction activities.

## **SECTION 7.0 – REFERENCES**

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True, Delbert L.

- 1958 An Early Complex in San Diego County, California. *American Antiquity* 23(3):255-263.
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True, Delbert L., and Georgie Waugh

- 1981 Archaeological Investigations in Northern San Diego County, California: Frey Creek. *Journal of California and Great Basin Anthropology* 3(1):84-115.
- 1982 Proposed Settlement Shifts during San Luis Rey Times: Northern San Diego County, California. *Journal of California and Great Basin Anthropology* 7(2):240-244.
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## **SECTION 8.0 – LIST OF PREPARERS AND PERSONS AND ORGANIZATIONS CONTACTED**

The following persons participated in the preparation of this report:

Chambers Group Inc.:

Corinne Lytle-Bonine  
Sandra Pentney  
Lucas Tutschulte  
Richard Shultz  
Phillip Carlos

Project Manager  
Principal Investigator  
Primary author  
Field Director, co-author  
GIS

TerraGen:

Amy Fuller  
Mark Turner

Permitting Director  
VP, Energy Storage Development

Saving Sacred Sites Native American Site Monitoring:

Carmen Mojado  
Banning Taylor  
Natane Casteñeda  
Pekelo Umi  
Alli Suianoa

Environmental Coordinator  
Native American Monitor  
Native American Monitor  
Native American Monitor  
Native American Monitor

The following agencies and individuals were contacted:

Cheryl Madrigal  
Tribal Historic Preservation Officer

Rincon Band of Luiseno Indians

Jamie Lennox

South Coastal Information Center

Steve Quinn

Native American Heritage Commission



## **SECTION 9.0 – LIST OF MITIGATION MEASURES AND DESIGN CONSIDERATIONS**

As addressed in Section 5.0, the following mitigation measures and design considerations will serve to mitigate project impacts to below a level of significance.

**Table 5: Mitigation Measures and Design Considerations**

<b>Site Number</b>	<b>Direct Impacts</b>	<b>Mitigation Measures</b>
P-37-000759	Yes	Adherence to MM CUL 1 and 2 will reduce the impact to a level below significance
P-37-015414	No	None; not a significant resource
P-37-017525	No	None; likely no longer extant due to construction of SDG&E Valley Center Substation
P-37-017526	No	None; likely no longer extant due to construction of SDG&E Valley Center Substation
P-37-017527	No	None; likely no longer extant due to construction of SDG&E Valley Center Substation
P-37-030999	No	Site will be protected by protective fencing as discussed in MM CUL-2
P-37-031002	No	None; site is located outside areas of direct impact
P-37-033119	No	None; mismapped as within APE
P-37-033120	No	None; mismapped as within APE

## **APPENDIX A – CHRIS SEARCH RECORDS**





South Coastal Information Center  
San Diego State University  
5500 Campanile Drive  
San Diego, CA 92182-5320  
Office: (619) 594-5682  
www.scic.org  
nick@scic.org

## CALIFORNIA HISTORICAL RESOURCES INFORMATION SYSTEM RECORDS SEARCH

**Company:** Chambers Group

**Company Representative:** Kyle Knabb

**Date Processed:** 11/20/2019

**Project Identification:** Valley Center Battery Storage #21206

**Search Radius:** 1/2 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

<b>RSID:</b>	2683
<b>RUSH:</b>	no
<b>Hours:</b>	1
<b>Spatial Features:</b>	51
<b>Address-Mapped Shapes:</b>	no
<b>Digital Database Records:</b>	0
<b>Quads:</b>	1
<b>Aerial Photos:</b>	0
<b>PDFs:</b>	Yes
<b>PDF Pages:</b>	272

## **CONFIDENTIAL APPENDIX B – NATIVE AMERICAN CORRESPONDENCE**



## NATIVE AMERICAN HERITAGE COMMISSION

March 23, 2020

Elizabeth Fortin  
Chambers Group

Via Email to: spentney@chambersgroupinc.com

Re: Valley Center Energy Storage Project, San Diego County

Dear Ms. Fortin:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information you have submitted for the above referenced project. The results were negative. However, the absence of specific site information in the SLF does not indicate the absence of cultural resources in any project area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites.

Attached is a list of Native American tribes who may also have knowledge of cultural resources in the project area. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. I suggest you contact all of those indicated; if they cannot supply information, they might recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call or email to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from tribes, please notify me. With your assistance, we can assure that our lists contain current information.

If you have any questions or need additional information, please contact me at my email address: [steven.quinn@nahc.ca.gov](mailto:steven.quinn@nahc.ca.gov).

Sincerely,

Steven Quinn  
Cultural Resources Analyst

Attachment

CHAIRPERSON  
**Laura Miranda**  
LuiseñoVICE CHAIRPERSON  
**Reginald Pagaling**  
ChumashSECRETARY  
**Merri Lopez-Keifer**  
LuiseñoPARLIAMENTARIAN  
**Russell Attebery**  
KarukCOMMISSIONER  
**Marshall McKay**  
WintunCOMMISSIONER  
**William Mungary**  
Paiute/White Mountain  
ApacheCOMMISSIONER  
**Joseph Myers**  
PomoCOMMISSIONER  
**Julie Tumamait-**  
**Stenslie**  
ChumashCOMMISSIONER  
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**Native American Heritage Commission  
Native American Contact List  
San Diego County  
3/23/2020**

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***Campo Band of Diegueno Mission Indians***

Ralph Goff, Chairperson  
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***Ewiiapaayp Band of Kumeyaay Indians***

Michael Garcia, Vice Chairperson  
4054 Willows Road Diegueno  
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Fax: (619) 445-9126  
michaelg@leaningrock.net

***Ewiiapaayp Band of Kumeyaay Indians***

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4054 Willows Road Diegueno  
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***Iipay Nation of Santa Ysabel***

Virgil Perez, Chairperson  
P.O. Box 130 Diegueno  
Santa Ysabel, CA, 92070  
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***Iipay Nation of Santa Ysabel***

Clint Linton, Director of Cultural Resources  
P.O. Box 507 Diegueno  
Santa Ysabel, CA, 92070  
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cjlinton73@aol.com

***Inaja-Cosmit Band of Indians***

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***Jamul Indian Village***

Erica Pinto, Chairperson  
P.O. Box 612 Diegueno  
Jamul, CA, 91935  
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***Kwaaymii Laguna Band of Mission Indians***

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***La Jolla Band of Luiseno Indians***

Fred Nelson, Chairperson  
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***La Posta Band of Diegueno Mission Indians***

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8 Crestwood Road Diegueno  
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***La Posta Band of Diegueno Mission Indians***

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This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resource Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Valley Center Energy Storage Project, San Diego County.

**Native American Heritage Commission  
Native American Contact List  
San Diego County  
3/23/2020**

**Manzanita Band of Kumeyaay  
Nation**

Angela Elliott Santos, Chairperson  
P.O. Box 1302 Diegueno  
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**Mesa Grande Band of Diegueno  
Mission Indians**

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P.O. Box 270 Diegueno  
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**Pauma Band of Luiseno Indians**

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**Pechanga Band of Luiseno  
Indians**

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**Pechanga Band of Luiseno  
Indians**

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**Rincon Band of Luiseno Indians**

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One Government Center Lane Luiseno  
Valley Center, CA, 92082  
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**Rincon Band of Luiseno Indians**

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One Government Center Lane Luiseno  
Valley Center, CA, 92082  
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**San Luis Rey Band of Mission  
Indians**

San Luis Rey, Tribal Council  
1889 Sunset Drive Luiseno  
Vista, CA, 92081  
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Fax: (760) 724-2172  
cjmojado@slrmissionindians.org

**San Luis Rey Band of Mission  
Indians**

1889 Sunset Drive Luiseno  
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Indians**

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This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resource Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Valley Center Energy Storage Project, San Diego County.

**Native American Heritage Commission  
Native American Contact List  
San Diego County  
3/23/2020**

***Soboba Band of Luiseno  
Indians***

Joseph Ontiveros, Cultural  
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P.O. BOX 487  
San Jacinto, CA, 92581  
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Cahuilla  
Luiseno

***Sycuan Band of the Kumeyaay  
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Cody Martinez, Chairperson  
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Kumeyaay

***Sycuan Band of the Kumeyaay  
Nation***

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Resource Specialist  
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Kumeyaay

***Viejas Band of Kumeyaay  
Indians***

John Christman, Chairperson  
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Diegueno

***Viejas Band of Kumeyaay  
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epingleton@viejas-nsn.gov

Diegueno

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resource Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Valley Center Energy Storage Project, San Diego County.



April 16, 2020  
(21206)

[Name]  
[Position]  
[Tribe]  
[Address]

**SUBJECT: REQUEST FOR INFORMATION: VALLEY CENTER ENERGY STORAGE PROJECT**

Dear [Name],

Chambers Group, Inc. is providing you with this letter because your Tribe, the [Tribe], was listed on the Native American Heritage Commission (NAHC) directory as an individual or group who may have additional knowledge pertaining to tribal cultural resources within the geographic area where the Valley Center Energy Storage Project (Project) is proposed.

The Project is located at 29523 Valley Center Road, Valley Center, California on an 8.93-acre parcel of private land (APN 189-013-20-00) within San Diego County. Access to the site is provided from Valley Center Road via a permanent Project-controlled access easement. The Project can be found within the United States Geological Survey (USGS) *Valley Center* 7.5-minute topographic quadrangles, Section 18, Township 11 South, Range 1 West (see attached map). Construction of the Project is anticipated to occur over approximately 6 months, beginning as early as fourth quarter, 2020.

The Project involves the development of a lithium-ion battery energy storage facility capable of delivering up to 140 MW for approximately a 4-hour duration. The Project will interconnect to the existing, adjacent San Diego Gas & Electric 69kV Valley Center Substation (Substation) via an approximately 0.3-mile underground generation tie-line. The Project will be comprised of up to 60 sets of four battery enclosures that will house the battery energy storage system including cells, modules, racks, HVAC systems, inverters, and fully integrated fire and safety system. The battery storage enclosures currently under consideration for the Project are approximately 31.6 feet long by 5.7 feet wide by 8.6 feet high; however, the size will ultimately vary depending on the battery and battery energy storage system manufacturer(s) selected for the Project.

The batteries will be charged from the California Independent System Operator grid via the Project's interconnection to the Substation. Energy stored in the Project will then be discharged into the grid when the energy is needed, providing important electrical reliability services to the local area. The Project will be unmanned during operations, with no buildings or parking areas.

A Sacred Lands File search by the NAHC indicates that no sacred sites have been identified within a one-mile radius of the proposed Project. The California Historical Resources Information System records search identified 26 previously recorded cultural resources located within 0.5 mile of the Project site. Two were mapped within portions of the Project area. We are working with our client to provide recommendations on project design and cultural resources scope of work for site evaluations.

SANTA ANA LOS ANGELES REDLANDS SAN DIEGO EL CENTRO

CORPORATE OFFICE 5 Hutton Centre Drive, Suite 750 | Santa Ana, California 92707

t | 949.261.5414 f | 866.261.3100 w | [www.chambersgroupinc.com](http://www.chambersgroupinc.com)

If the [Tribe] has any concerns regarding the proposed Project as it relates to Native American issues or interests, or has any information regarding sacred sites in the vicinity of the proposed Project that may help avoid impacts to those sites, please send your response to:

Sandra Pentney M.A. RPA  
9620 Chesapeake Drive, Suite 202  
San Diego, CA 92123  
spentney@chambersgroupinc.com

If we have not heard from you within 30 days, we will assume that you have no comments.

Sincerely,

**CHAMBERS GROUP, INC.**

**Sandra Pentney, M.A., RPA**  
**Project Cultural Resources Specialist**

Attachments – Project Location Map



# Rincon Band of Luiseño Indians

## CULTURAL RESOURCES DEPARTMENT

---

One Government Center Lane | Valley Center | CA 92082  
(760) 749-1051 | Fax: (760) 749-8901 | rincon-nsn.gov



May 8, 2020

**Sent via email: [spentney@chambersgroupinc.com](mailto:spentney@chambersgroupinc.com)**

Chambers Group, Inc.

Sandra Pentney

5 Hutton Centre Drive, Suite 750

Santa Ana, CA 92707

### **Re: Valley Center Energy Storage Project**

Dear Ms. Pentney,

This letter is written on behalf of the Rincon Band of Luiseño Indians (“Rincon Band” or “Band”), a federally recognized Indian Tribe and sovereign government in response to your request for additional information on the above referenced project.

The location identified in the transmitted project documents is situated within the Territory of the Luiseño people and within the Band’s specific Area of Historic Interest (AHI). As such, Rincon is traditionally and culturally affiliated to the project area.

After review of the provided documents and our internal information, the Band has specific concerns that the project will impact tangible Tribal Cultural Resources (TCRs), Traditional Cultural Landscapes (TCLs). Embedded in these resources and within the AHI are Rincon’s history, culture, and continuing traditional identity. The Band has knowledge of cultural resources within and close to the project site.

Based on the information provided above, the Rincon Band recommends for this project:

- An archaeological/cultural resources study be conducted by a Secretary of the Interior and County of San Diego qualified archaeologist for this project, to include an archeological record search and complete intensive survey of the property;
- A professional Tribal monitor from the Rincon Band to accompany the archaeologist during the survey;
- A final copy of the study to be provided to the Rincon Band for our review and comment
- Review of design in close consultation with the Rincon Band to discuss avoidance, mitigation measures including Rincon Tribal Monitoring, and treatment of cultural resources.

The Rincon Band further requests to consult directly with the lead agency regarding project impacts to cultural resources. While it is not the responsibility of the Chambers Group to facilitate State-mandated consultation, the request is included in this letter so the lead agency is aware of the Band’s concerns about the project. Through direct, respectful government-to-government consultation, the lead agency will be able to appropriately evaluate project effects to the environment and cultural resources early in the process, and will be able to generate adequate, culturally sensitive project mitigation measures with the assistance of the Band. It is important to note that the Band

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Bo Mazzetti  
Chairman

Tishmall Turner  
Vice Chair

Laurie E. Gonzalez  
Council Member

Alfonso Kolb, Sr.  
Council Member

John Constantino  
Council Member

is not opposed to development projects per se, but is opposed to direct, indirect, and cumulative impacts that projects may have to TCRs, TCPs, and sovereign lands, and requests that the Chambers Group also clearly address these types of impacts to cultural resources in the final environmental report.

Furthermore, Rincon requests from the Chambers Group inclusion of appropriate provisions for inadvertent discoveries as required by every major Federal and state law (See CEQA (Cal. Pub. Resources Code §21083.2(i); 14 CCR §15064.5(f)); Section 106 (36 CFR §800.13); NAGPRA (43 CFR §10.4)). Please also include language outlining the formal State process for the discovery of human remains and grave goods for the final report (CA Health and Safety Code §7050.5; Cal. Pub Resources Code §5097.98).

The Rincon Band reserves its right to fully participate in the environmental review process and to review and submit additional information after the above documentation has been received during our consultation meeting(s) with the lead agency. The Band thanks the Chambers Group for submitting this project for Tribal review and thoughtfully addressing the Band's requests and recommendations in the final cultural resources report.

If you have additional questions or concerns, please do not hesitate to contact our office at your convenience at (760) 297-2635 or via electronic mail at [cmadrigal@rincon-nsn.gov](mailto:cmadrigal@rincon-nsn.gov). We look forward to working together to protect and preserve our cultural assets.

Sincerely,



Cheryl Madrigal  
Tribal Historic Preservation Officer  
Cultural Resources Manager

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## **CONFIDENTIAL APPENDIX C – STP PROGRAM AND RESULTS**

## **CONFIDENTIAL APPENDIX D – CONFIDENTIAL MAPS AND FIGURES**

