

From: Beddow, Donna
To: ["Micah Hale"](#)
Subject: RE: Soitec EIR
Date: Thursday, September 12, 2013 4:42:00 PM
Attachments: [TRADITIONAL CULTURAL PROPERTIES.docx](#)

Hey Micah –

Just tried to call and no luck. Are you available? The answer is yes please forward the Cultural EIR section to me and I can complete the review. A couple things I just remembered that we need to add to the chapter is Native American Participation and TCPs. You will need to customize the NA participation since your project was not required to include SB-18 consultation. Below and attached are the examples that we have been using. I think the TCP example came from you.

As far as cumulative. At a minimum, the analysis is going to be required in the EIR. If the cumulative projects are the same for all of your projects, then one analysis is required.

The section below was placed below the analysis of sites in the EIR. I have attached the chapter from Lilac Hills Ranch for your reference.

Native American Consultation

The Native American Heritage Commission was contacted for a search of their sacred lands files. Individuals and groups identified by the Native American Heritage Commission were contacted regarding the project. County staff sent letters to the Native American community notifying them of the project and requesting their participation in the SB-18 consultation process. Five tribes responded to the request for SB-18 consultation: Soboba, Pechanga, San Luis Rey, Rincon, and Pala. Consultations were held at the County with each of these tribes. Consultation is ongoing as the project progresses throughout the application process.

Native American monitors from Saving Sacred Sites participated in the survey and testing program. Cami Mojado, the cultural resources representative of the San Luis Rey Band of Luiseño Mission Indians, was consulted throughout the survey and testing program and coordinated the Native American monitors.

Let me know if you have any questions.

Thanks,

Donna Beddow

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From: Micah Hale [mailto:mhale@dudek.com]
Sent: Thursday, September 12, 2013 2:24 PM
To: Beddow, Donna
Cc: Brad Comeau
Subject: Soitec EIR

Hi Donna,

Can I submit a screen check of our EIR edits to you just to make sure we're not total idiots. It should be pretty good because we addressed all of your concerns and comments.

Also, we're getting pushback from Soitec for preparing a separate cumulative for each tech report. I'm obligated to ask if you can waive that requirement. If not, ok, we'll finish those up also.

Thanks, Micah

TRADITIONAL CULTURAL PROPERTIES

Native American Heritage Values

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

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

1. A location associated with the traditional beliefs of a Native American group about its origins, its cultural history, or the nature of the world;
2. A rural community whose organization, buildings and structures, or patterns of land use reflect the cultural traditions valued by its long-term residents;
3. An urban neighborhood that is the traditional home of a particular cultural group, and that reflects its beliefs and practices;
4. A location where Native American religious practitioners have historically gone, and are known or thought to go today, to perform ceremonial activities in accordance with traditional cultural rules of practice; and
5. A location where a community has traditionally carried out economic, artistic, or other cultural practices important in maintaining its historic identity.

A traditional cultural property, then, can be defined generally as one that is eligible for inclusion in the National Register because of its association with cultural practices or beliefs of a living community that (a) are rooted in that community's history, and (b) are important in maintaining the continuing cultural identity of the community.

Possible Response under Management considerations;

5.1.4 Native American Heritage Values of Tested Sites

No information has been obtained through Native American consultation or communication with the Native American monitor during fieldwork that any of the evaluated sites are culturally significant. No Traditional Cultural Properties are known to exist within the project area that

current serve religious or other community practices. During the current archaeological evaluation, no artifacts or remains were identified or recovered that could be reasonably associated with such practices. All prehistoric archaeological material consisted of common flaked stone and groundstone items, and those in very limited quantities.