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An Employee-Owned Company

October 23, 2020

Mr. Sean Paver
City of San Diego
Engineering & Capital Projects Department
525 B Street, 12th Floor, MS 908A
San Diego, CA 92101-4502

Reference: Results of the Historical Resources Survey of the Wetland Mitigation Area for the La Media Road Improvement Project, San Diego, California (RECON Number 9227)

Dear Mr. Paver:

This report describes the results of the historical resource survey for the La Media Road Improvement Project (project) proposed by the City of San Diego Engineering & Capital Projects Department (City), located within the Otay Mesa area of the city of San Diego. The project site is located on assessor parcel numbers 646-110-05 and 646-110-06 in the city of San Diego, south of State Route 905 (SR-905), and southwest of the intersection of La Media Road and Airway Road (Figures 1 through 4). The City proposes wetland creation and enhancement as mitigation for impacts to wetlands caused by the La Media Road Improvement project. Creation will consist of converting non-native grassland to wetland and riparian habitat through plant and seed installation and maintenance. Enhancement will consist of improving existing wetland habitat through weed removal and maintenance and may include some plant or seed installation. The creation and enhancement will require weed dethatching of native and non-native plants with mowers, line trimmers, and rakes. A small bulldozer or skidsteer will be used to recontour/grade portions of the site to create topography that supports wetland habitat. The area of potential effect (APE) totals 6.05 acres.

The project site is found in the northeast ¼ of the southeast ¼ of Section 34, Township 18 South, Range 01 West, of the U.S. Geological Survey 7.5-minute topographic map, Otay Mesa quadrangle (see Figure 2; USGS 1994). The project is also shown on the City of San Diego 800' scale maps (see Figure 3). Commercial/Industrial development occurs to the east, northeast, and southeast of the project, while vacant land occurs to the west (see Figure 4). Brown Field Municipal Airport is to the northwest of the project.

1.0 Physical and Cultural Setting

1.1 Physical Setting

The project is roughly in the middle of the Otay Mesa marine terrace (see Figure 2). Otay Mesa begins approximately 5.5 miles east of the Pacific Ocean, rising rather sharply from an elevation about 60 feet above mean sea level (AMSL) in the Tijuana River and Otay River mouths, to an elevation around 500 feet AMSL on the mesa's east end. The Otay river valley forms Otay Mesa's northern boundary. The valley's southern slopes are steep and heavily cut by small drainages emptying into the Otay River. The natural southern boundary of Otay Mesa is the Tijuana River and its tributary, Cottonwood Creek, both of which extend south of the U.S.–Mexico border. The eastern end of Otay Mesa is Otay Mountain, situated at the west end of the San Ysidro Mountains.

Project Location

FIGURE 1
Regional Location

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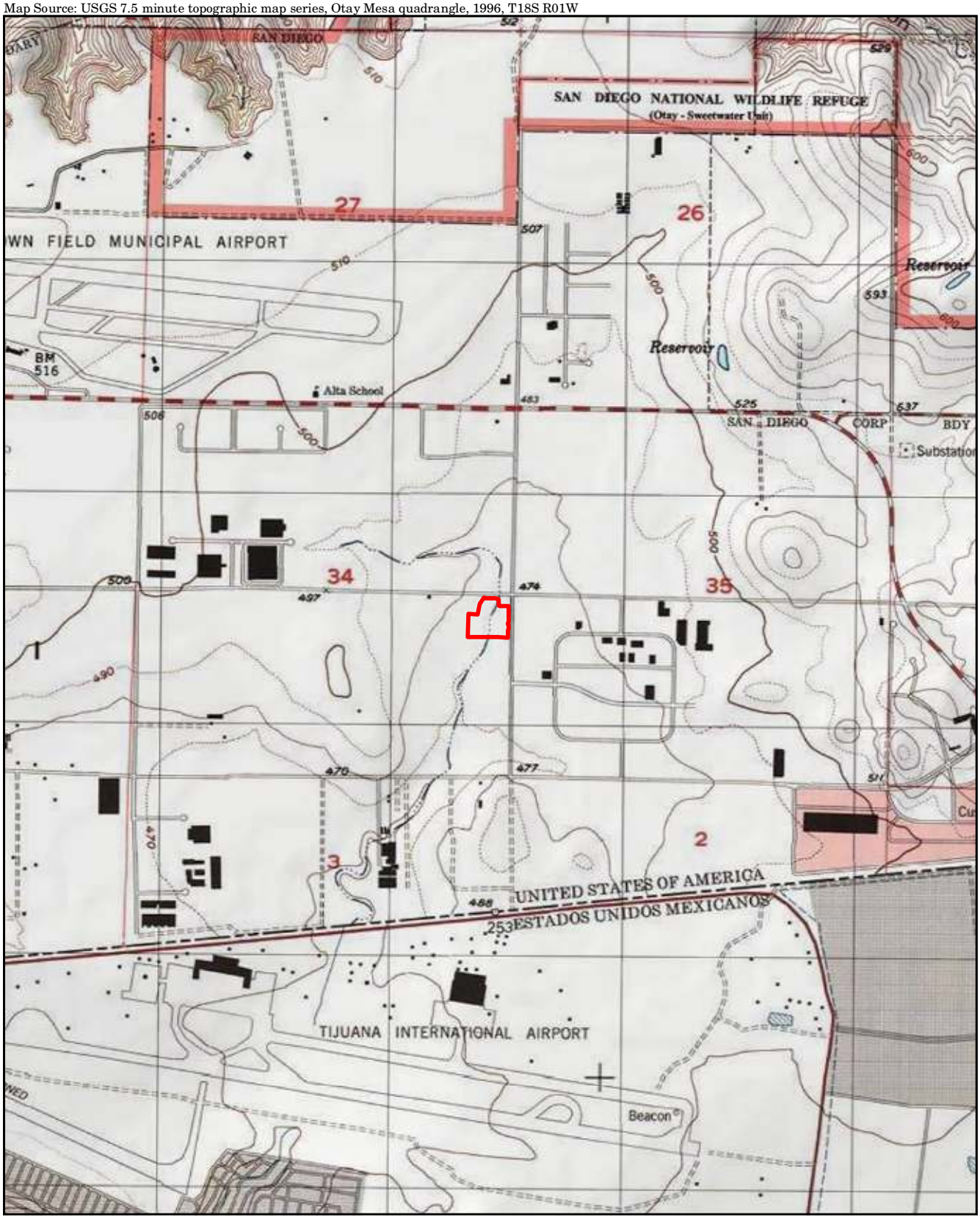
Map Source: USGS 7.5 minute topographic map series, Otay Mesa quadrangle, 1996, T18S R01W



0 Feet 2,000

Mitigation Site Boundary

FIGURE 2

Mitigation Site Location on USGS Map

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Map Source: City of San Diego, Engineering and Development Department, City 800' Maps, Number 138-1773

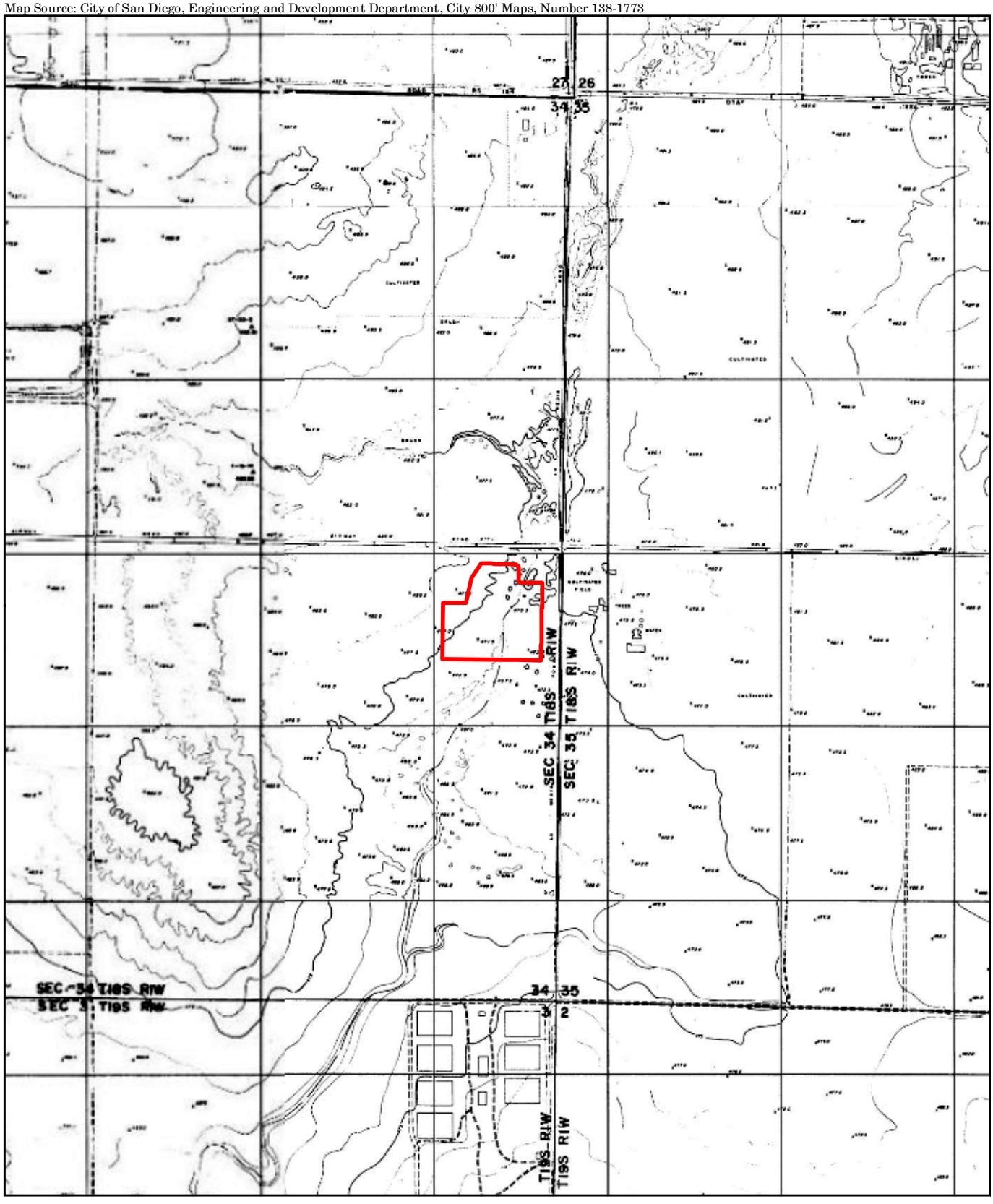

FIGURE 3

Mitigation Site Location on City 800' Map

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Image Source: Nearmap (flown May 2020)

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FIGURE 4

Project Location on Aerial Photograph

Otay Mesa is one of a series of three uplifted marine terraces, the La Jolla Terrace, Linda Vista Terrace, and Poway Terrace, which stretch along the coastline of metropolitan San Diego. Otay Mesa is part of the Linda Vista Terrace, which occurs between the elevations of 300 feet and 500 feet AMSL. In the project area, the top layer of this terrace is composed of the Linda Vista Formation. The Linda Vista Formation consists of near shore marine and non-marine deposits dating from the early Pleistocene, and is composed of interbedded sandstones and cobble conglomerate with a generally reddish-brown coarse sand matrix (Abbott 1999).

The Santiago Peak Volcanic Formation occurs in the foothills on the eastern edge of Otay Mesa. This material is of upper Cretaceous age and is represented as fine-grained, green metavolcanic stone that is locally known as felsite. Nodules and large cobbles of these Santiago Peak materials occur across Otay Mesa, including the project area, as float (Abbott 1999).

Two soil types are mapped in the survey area, Huerhuero loam and Stockpen gravelly clay loam. Huerhuero loam, 2 to 9 percent slopes, occurs in the eastern portion of the survey area. It is a moderately drained soil type with a clay subsoil and forms mima mounds in undisturbed areas. It has moderate water-holding capacity, slow to medium runoff, and slight to moderate erosion potential. Stockpen gravelly clay loam, 2 to 5 percent slopes occurs in the western portion of the survey area. It is a moderately well-drained, moderately deep soil type consisting of marine deposits. It has very low water permeability and low water holding capacity. Runoff is slow, with only slight erosion hazard. A representative soils profile has a surface layer of strongly acid and medium acid loam for 12 inches. The upper part of the subsoil (down to 41 inches) is moderately alkaline clay followed by mildly alkaline clay loam and sandy loam (U.S. Department of Agriculture 1973). As noted by Robbins-Wade (1990), the presence of clay soils in this region has implications with regard to site formation processes, as the expanding and contracting characteristics of these soils result in the opening and closing of fissures in the soil. This movement takes artifacts and other cultural debris from the surface to various depths below the surface. In addition, it has been proposed that items, which make up cultural features, are differentially moved vertically, lowering the chances of finding intact features and stratified deposits.

Prior to European settlement, the mesa tops on western Otay Mesa, including the project area, would have been covered with a combination of vernal pool/perennial grassland areas interspersed with coastal sage scrub and maritime succulent scrub communities. The south slopes of the Otay river valley and the smaller drainages would have supported moderate to dense chamise chaparral communities that extended up onto the edges of the mesa. Riparian communities such as southern willow scrub and freshwater marsh would exist in the bottoms of the larger drainages such as Dennery Canyon, and moderate to dense chamise chaparral communities extended up onto the edges of the mesa (Holland 1986).

The current vegetation on the project property is predominantly non-native grasses followed by emergent wetland, vernal pool, freshwater marsh, and native grasslands. Non-native species include rattail sixweeks grass (*Festuca myuros*), slender wild oat (*Avena barbata*), as well as non-native annual forbs such as Crete weed (*Hedypnois cretica*), bristly ox-tongue (*Helminthotheca echioides*), and fennel (*Foeniculum vulgare*). Native cover is less than 50 percent, characterized by scattered native shrubs, including California buckwheat (*Eriogonum fasciculatum*) and broom baccharis (*Baccharis sarothroides*) (RECON 2020). Water sources on Otay Mesa are intermittent, consisting of seasonally running streams and vernal pools. It is generally accepted that in prehistoric times drainages had more substantial flows and the water table was generally higher (Christenson 1989). These conditions may have resulted in water being available on the mesa for a longer percentage of the year than it is now. Otay River, to the north, would also have been a more regular source of water in prehistoric times.

A variety of usable resources would have been available to prehistoric populations in the project area. The coastal sage scrub, chamise chaparral, and maritime succulent scrub communities contain many plants used by the ethnographic Kumeyaay population. Three plants in particular, manzanita (*Archtostaphylos* sp.), white sage (*Salvia apiana*), and elderberry (*Sambucus mexicana*), were used for a variety of purposes in

ethnographic times. Uses for these plants included food, medicinal, ceremonial, and as a source of wood. Animals available on the mesa would include jackrabbit, bush rabbit, cottontail rabbit, ground squirrel, woodrat, other small rodents, deer, and various small birds and reptiles.

Another resource available to prehistoric populations on Otay Mesa would be Santiago Peak Volcanics, a raw material for flaked stone tool production. This material occurs in cobble and block form throughout the Linda Vista Formation and is easily obtainable as it erodes out of its matrix. Santiago Peak Volcanics also occur as bedrock outcrops on the sides of Otay Mountain.

1.2 Cultural Setting

1.2.1 Prehistoric Period

The prehistoric cultural sequence in San Diego County is generally conceived as comprising of three basic periods: the Paleoindian, dated between about 11,500 and 8,500 years ago and manifested by the artifacts of the San Dieguito Complex; the Archaic, lasting from about 8,500 to 1,500 years ago (A.D. 500) and manifested by the cobble and core technology of the La Jolla Complex; and the Late Prehistoric, lasting from about 1,500 years ago to historic contact (i.e., A.D. 500 to 1769) and represented by the Cuyamaca Complex. This latest complex is marked by the appearance of ceramics, small arrow points, and cremation burial practices.

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 points. The San Dieguito Complex is thought to represent an early emphasis on hunting (Warren et al. 1993:III-33).

The Archaic Period brings an apparent shift toward a more generalized economy and an increased emphasis on seed resources, small game, and shellfish. The local cultural manifestations of the Archaic Period are called the La Jolla Complex along the coast and the Pauma Complex inland. Pauma Complex sites lack the shell that dominates many La Jolla sites. Along with an economic focus on gathering plant resources, the settlement system appears to have been more sedentary. The La Jolla assemblage is dominated by rough cobble-based choppers and scrapers, and slab and basin metates. Large side-notched and Elko series projectile points appeared. Large deposits of marine shell at coastal sites argue for the importance of shellfish gathering to the coastal Archaic economy.

Near the coast and in the Peninsular Mountains beginning approximately 1,500 years ago, patterns began to emerge which suggest the ethnohistoric Kumeyaay. This period is characterized by higher population densities and elaborations in social, political, and technological systems. Economic systems diversify and intensify during this period, with the continued elaboration of trade networks, the use of shell-bead currency, and the appearance of more labor-intensive, but effective technological innovations. The late prehistoric archaeology of the San Diego coast and foothills is characterized by the Cuyamaca Complex. It is primarily known from the work of D. L. True at Cuyamaca Rancho State Park (True 1970). The Cuyamaca Complex is characterized by the presence of steatite arrowshaft straighteners, steatite pendants, steatite comales (heating stones), Tizon Brownware 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.

1.2.2 Ethnohistory

The Kumeyaay (also known as Kamia, Ipai, Tipai, and Diegueño) occupied the southern two-thirds of San Diego County. The Kumeyaay lived in semi-sedentary, politically autonomous villages or rancherias. Settlement system typically consisted of two or more seasonal villages with temporary camps radiating away

from these central places (Cline 1984a and 1984b). Their economic system consisted of hunting and gathering with a focus on small game, acorns, grass seeds, and other plant resources. The most basic social and economic unit was the patrilocal extended family. A wide range of tools were made of locally available and imported materials. A simple shoulder-height bow was used for hunting. Numerous other flaked stone tools were made including scrapers, choppers, flake-based cutting tools, and biface knives. Preferred stone types were locally available metavolcanic, chert, and quartz. Obsidian was imported from the deserts to the north and east. Ground stone objects include mortars and pestles typically made of locally available, fine-grained granite. Both portable and bedrock types are known. The Kumeyaay made fine baskets. These employed either coiled or twined construction. The Kumeyaay also made pottery, using the paddle-and-anvil technique. Most were a plain brown utility ware called Tizon Brownware, but some were decorated (Meighan 1954; May 1976, 1978).

1.2.3 Spanish/Mexican/American Periods

The Spanish Period (1769–1821) represents a time of European exploration and settlement. Military and naval forces along with a religious contingent founded the San Diego Presidio, the pueblo of San Diego, and the San Diego Mission in 1769 (Rolle 1998). Native American culture in the coastal strip of California rapidly deteriorated despite repeated attempts to revolt against the Spanish invaders (Cook 1976). One of the hallmarks of the Spanish colonial scheme was the rancho system. In an attempt to encourage settlement and development of the colonies, large land grants were made to meritorious or well-connected individuals.

In 1821, Mexico declared its independence from Spain. During the Mexican Period (1822–1848), the mission system was secularized by the Mexican government and these lands allowed for the dramatic expansion of the rancho system. The southern California economy became increasingly based on cattle ranching.

After the Treaty of Guadalupe-Hidalgo in 1848 (beginning of the American Period), the population in San Diego County more than tripled (Pourade 1969). By the late 1800s, development in the county was well under way with the beginnings of a recognizable downtown San Diego area and the gradual development of a number of outlying communities, many of which were established around previously defined ranchos and land grants. Otay Mesa developed slowly until the 1870s. In 1869, a stage route to Yuma was opened that ran across the mesa. Farming developed through the 1870s, and by 1879 most of the mesa was under intensive agriculture. The most widely grown crops on the mesa were wheat, barley, corn, tomatoes, and beans. Water for crops was obtained from nearby streams and the Otay River, and by the early 1900s an extensive system of dams had developed (Pryde 1992).

Otay Mesa followed a particular rural community cultural pattern that developed in San Diego County from approximately 1870 to 1930. These communities were composed of an aggregate of people who lived within well-defined geographic boundaries, shared common bonds, and cooperated to solve common problems (Collett and Wade 1991). They lived, not in small towns or villages, but on farmsteads tied together through a common school district, church, post office, and country store (Hector and Van Wormer 1986). The Otay Mesa School District was started in 1914, and the Alta schoolhouse was constructed at that time. The schoolhouse, originally just east of Brown Field, was moved east to preserve it. By 1890 Otay also had a store, post office, blacksmith shop, and a Lutheran church. The population of Otay Mesa fluctuated over the early 1900s due to drought and in the 1930s due to the Great Depression.

Along with its agricultural history, aviation was important in Otay Mesa's history. In 1883, John Joseph Montgomery made the world's first controlled flight with a fixed curved-wing glider from the top of a hill on Otay Mesa. In 1918, the Army Air Corps established East Field along Otay Mesa Road, later also used by the Navy for pilots in training. In 1935, East Field was transferred to the Navy and was used for training prior to and during World War II. East Field was renamed Brown Field in 1943. After World War II, the Navy leased Brown Field to San Diego County, but reopened the facility with the outbreak of the Korean War in 1951. The City annexed Otay Mesa in 1956 and acquired Brown Field in 1962 in order to relieve

congestion at Lindbergh Field. The conversion of Brown Field to a general aviation airport brought new businesses, industries, and agencies to Otay Mesa.

Ranching and farming continued to be the main occupation of residents in and around the project area through most of the twentieth century. Over the past decades, large tracts of this formerly open land have been developed for light industrial, and more recently, residential projects. The result has been a dramatic change of the region from a sparsely populated rural area to expansive suburb.

2.0 Area of Potential Effect

The APE is considered for this report to include both creation and enhancement areas. The APE consists of approximately 6.05 acres.

3.0 Study Methods

The historical resources survey included both an archival search and an on-site foot survey of the 7.74 acres, including the 6.05-acre APE. An in-house records search with a one-mile radius buffer was conducted in order to determine if previously recorded prehistoric or historic cultural resources occur in the APE. Historic aerial photographs were also checked in order to see past development within and near the APE.

A letter was sent to the Native American Heritage Commission (NAHC) on March 25, 2019, requesting they search their files to identify spiritually significant and/or sacred sites or traditional use areas in the proposed project vicinity (Attachment 1). The NAHC was also asked to provide a list of local Native American tribes, bands, or individuals who may have concerns or interests in the cultural resources of the proposed project.

The field survey was conducted on August 5, 2020, by RECON archaeologist Harry J. Price, accompanied by Corel Taylor, a Native American representative from Red Tail Environmental. The APE was inspected for evidence of archaeological materials such as flaked and ground stone tools, ceramics, milling features, and historic features. Photographs were taken to document the environmental setting and general conditions. Historic aerial photographs were also checked in order to see past development within and near the project area.

4.0 Survey Results

4.1 Record Search

RECON reviewed a records search with a one-mile radius buffer from March 2019 for a project in a similar location. The 2019 search was requested from the California Historical Resources Information System, south Coast Information Center (SCIC) at San Diego State University. The SCIC lists a total of 38 cultural resources within the one-mile search radius (Table 1). Of these, three are historic-period resources, two are multi-component resources, and 33 are prehistoric. The historic-period resources include a ranch, roadway, and religious building. The multicomponent resources are a lithic scatter with foundations, a cistern and trash scatter, a shell and lithic scatter with foundations, and a trash scatter. The prehistoric resources include 16 isolated artifacts, 15 lithic scatters, and 2 shell scatters. None of these resources occur within the APE. The record search results maps and resource lists are included in Confidential Attachment 1.

Table 1
Cultural Resources within One-Mile of the APE

Primary #	Trinomial #	Site Type	Period	Recording Events
37-005352	SDI-5352	Lithic scatter	Prehistoric	1991 (ERC Environmental)
37-007208	SDI-7208	Lithic scatter	Prehistoric	1979 (Ferguson); 2013 (AECOM) and various in between
37-007857	SDI-7857	Lithic scatter	Prehistoric	1980 (Walker); 1995 (Gallegos & Associates)
37-008053	SDI-8053	Isolate: scraper	Prehistoric	1980 (Talley)
37-008054	SDI-8054	Isolate: flake	Prehistoric	1980 (Talley)
37-008055	SDI-8055	Isolate: core	Prehistoric	1980 (Talley)
37-008056	SDI-8056	Isolate: core	Prehistoric	1980 (Talley)
37-008057	SDI-8057	Isolate: scraper	Prehistoric	1980 (Talley)
37-008058	SDI-8058	Isolate: core	Prehistoric	1980 (Talley)
37-008059	SDI-8059	Isolate: core	Prehistoric	1980 (Talley)
37-008060	SDI-8060	Isolate: flake	Prehistoric	1980 (Talley)
37-008061	SDI-8061	Isolate: core	Prehistoric	1980 (Talley)
37-008062	SDI-8062	Isolate: hammerstone	Prehistoric	1980 (Talley)
37-008063	SDI-8063	Isolate: flake	Prehistoric	1980 (Talley)
37-008064	SDI-8064	Isolate: cores	Prehistoric	1980 (Talley)
37-010245	SDI-10245	Lithic scatter	Prehistoric	1985 (Hector)
37-010608	SDI-10608	Lithic scatter	Prehistoric	1986 (Hector and Van Wormer); 1996 (Kyle et al.)
37-010628	SDI-10628	Lithic scatter; foundations, cistern, trash scatter	Multicomponent	1986 (Hector and Van Wormer); 1996 (Kyle et al.)
37-010734	SDI-10734	Lithic scatter	Prehistoric	1985 (Seneca)
37-010735	SDI-10735	Lithic scatter	Prehistoric	1987 (Cook and Elling)
37-010748	SDI-10748	Lithic scatter	Prehistoric	1987 (Wade)
37-011065	SDI-11065	Lithic scatter	Prehistoric	1986 (Cook)
37-011821	SDI-11821	Lithic, shell scatter, foundations, trash scatter	Multicomponent	1989 (Gross and Robbins-Wade); 1995 (Kyle et al.)
37-012257	SDI-12257	Lithic scatter	Prehistoric	1989 (Shilz); 2013 (AECOM)
37-012258	SDI-12258	Lithic scatter	Prehistoric	1989 (Shilz); 2000 (Brian F Smith); 2013 (AECOM)
37-012259	SDI-12259	Lithic scatter	Prehistoric	1989 (Shilz); 2013 (AECOM)
37-012337	SDI-12337	Lithic scatter	Prehistoric	1995 (Gallegos); 2002 (Affinis); 2007 (Affinis); 2010 (HDR); 2016 (ASM)
37-014282	SDI-14081	Lithic scatter	Prehistoric	1995 (Gallegos & Associates)
37-014298		Isolate: flake	Prehistoric	1995 (Gallegos & Associates)
37-015983		Farm/ranch	Historic	1997 (Affinis)
37-015988		Religious building; Cemetery	Historic	1997 (Gallegos)
37-016524		Isolate: core	Prehistoric	1998 (Heritage Resources)
37-016525		Isolate: flake	Prehistoric	1998 (Heritage Resources)
37-016526		Isolate: core	Prehistoric	1998 (Heritage Resources)
37-031491		Roadway	Historic	2010 (Affinis)
37-031951	SDI-20229	Shell scatter	Prehistoric	2011 (ESA)
37-031952	SDI-20230	Shell scatter	Prehistoric	2011 (ESA)
37-031953	SDI-20231	Lithic scatter	Prehistoric	2011 (ESA)

The SCIC lists two prehistoric archaeological sites, CA-SDI-12,337 and CA-SDI-7208, immediately adjacent to the APE. CA-SDI-12,337 is a lithic scatter that includes four previously recorded sites, CA-SDI-5352, -9974, -10,072, and -10,735. These four sites were combined, possibly by Mary Robbins-Wade in 2002 as part of the proposed 80-acre Lin project (Robbins-Wade 2002), or by Carolyn Kyle in 1996 (Kyle et.al. 1996) as part of the Otay Mesa Road Widening project. The current CA-SDI-12,337 covers over 700 acres. Different portions of what is now CA-SDI-12,337 have been tested in the past for various specific development projects, and these tests have determined the site lacks subsurface deposits and is not a significant historical resource under City criterion. The most recent survey of the property within CA-SDI-12,337 by Robbins-Wade in 2007 determined that although the site was an "important" resource under San Diego County guidelines, the research potential of the site had been fulfilled through the several previous testing programs of portions of the site (Robbins-Wade 2007).

CA-SDI-7208 was originally recorded by D. Ferguson in 1971 as a prehistoric site containing core fragments, two scrapers, and lithic waste. In subsequent years, the site has been updated eight times and expanded to encompass 720 acres. Most of the site was disturbed by farming in the past and several areas have been developed. Portions of the site have been evaluated for significance under the City, California Environmental Quality Act (CEQA), or National Register of Historic Places guidelines and none have been found significant.

A response letter from the NAHC was received on April 23, 2019, indicating the results of the records search of the Sacred Lands File for the project area were negative (see Attachment 1).

4.2 Survey Results

The field survey was conducted on August 5, 2020, by RECON archaeologist Harry J. Price, accompanied by Corel Taylor, a Native American Monitor from Red Tail Environmental. The topography of the APE is flat and undeveloped. Disturbances from road construction occur along Airway Road and La Media Road. An unnamed drainage runs through the APE in a northeast/southwest direction that contains riparian plants (Photograph 1). Ground visibility was zero percent (Photograph 2). There were a few areas of bare soil east of the drainage. Vegetation in the APE consisted mostly of non-native grasses including wild oats, with wetland and riparian habitats in the drainage area, and several vernal pools present in the eastern portion (RECON 2020). No cultural material was noted during the survey. No previously unrecorded prehistoric historical resources were found during the survey. No evidence of CA-SDI-12,337 or CA-SDI-7208 was observed during the survey; therefore, their boundaries likely do not extend into the APE.

A review of historic aerial photographs showed both roads along the perimeter of the APE, mima mounds, and the drainage within APE starting in 1953. The APE was in the same condition until the 1981 photograph when foot trails or paths in the northeastern portion are noted. In the 1996 photograph, a small area within the western half appeared to have been graded. In a 2002 photograph a small area in the eastern half appeared disturbed. In a 2003 photograph this area is no longer visible and appears to be covered in vegetation. The present grading and laydown yard to the northwest appears in the 2012 photograph. The remainder of the APE appears the same as the 1996 photograph (Nationwide Environmental Title Research [NETR] 2020).

PHOTOGRAPH 1
Drainage Area, Looking East

PHOTOGRAPH 2
Poor Ground Visibility, Looking Northeast from the Southeast Corner of the APE

5.0 Evaluation and Recommendations

5.1 Regulatory Framework

The project is subject to federal, state, and City environmental regulations. The City is the lead for compliance with CEQA guidelines and regulations. The U.S. Army Corps of Engineers is the lead agency for compliance with Section 106 of the National Historic Places Act (NHPA) and National Environmental Policy Act (NEPA) due to the presence of jurisdictional waters/wetlands.

5.1.1 Federal Regulations

The project is an undertaking as defined in Section 106 of the NHPA. Section 106 of the NHPA, as implemented (36 Code of Federal Regulations [CFR] Part 800), requires federal agencies to take into account the effects of their undertakings on historic properties. A key consideration for management is whether the cultural resources within the APE are eligible for inclusion in the NRHP. A resource must qualify under one or more criteria in order to be considered eligible for listing.

A property that qualifies for the NRHP is considered significant in terms of the planning process under the NHPA, NEPA, and other federal mandates. The NRHP Criteria for Evaluation (36 Code of Federal Regulations [CFR] 60.4) provides guidance in determining a property's eligibility for listing on the NRHP. This states that the quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and must meet one or more of the following criteria:

A. Is associated with events that have made a significant contribution to the broad patterns of our history; or

B. Is associated with the lives of persons significant in our past; or

C. Embodies the distinctive characteristics of a type, period, or method of construction, or that represents the work of a master, or that possesses high artistic values, or that represents a significant and distinguishable entity whose components may lack individual distinction; or

D. Has yielded, or may be likely to yield, information important in prehistory or history [36 CFR 60.4].

Further, a property must be evaluated within an important historic context and retain integrity of those features necessary to convey its significance. The integrity of a historic property can be adversely affected by an undertaking (36 CFR 800.5). An adverse effect is one that alters, "directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association" [36 CFR 800.5(1)].

Adverse effects on historic properties include, but are not limited to:

(i) Physical destruction of or damage to all or part of the property;

(ii) Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary's standards for the treatment of historic properties (36 CFR part 68) and applicable guidelines;

(iii) Removal of the property from its historic location;

(iv) Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;

(v) Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features;

(vi) Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and

(vii) Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance (36 CFR 800.5(2)).

Cultural isolates (isolated artifacts) are not considered significant, because they lack characteristics that would qualify them for listing on the NRHP.

5.1.2 State Regulations

As stated above, the project is also subject to CEQA guidelines. Significance criteria are found in CEQA Guidelines 15064.5(a) and 15064.5(c) and Section 5024 of the Public Resources Code.

A resource may be listed in the CRHR if it is significant at the federal, state, or local level under one of more of the four criteria listed below.

1. Are associated with events that have made a significant contribution to the broad patterns of local or regional history and cultural heritage of California or the United States.

2. Are associated with the lives of persons important to the nation or to California's past.

3. 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.

4. Has yielded, or may be likely to yield, information important in prehistory or history of the state or nation.

Since resources that are not listed or determined eligible for the state or local registers may still be historically significant, their significance must be determined if they are affected by a project. In addition to meeting one of the above criteria, a resource must have integrity; that is, it must evoke the resource's period of significance or, in the case of Criterion 4, it may be disturbed, but it must retain enough intact and undisturbed deposits to make a meaningful data contribution to regional research issues (California Code of Regulations Title 14, Chapter 11.5 Section 4852 [c]).

5.1.3 City Regulations

The City has developed a set of guidelines that ensure compliance with state and federal guidelines for the management of historical resources. These guidelines are stated in the City of San Diego's Historic Resources Regulations (HRR). The HRR has been developed to implement applicable local, state, and federal policies and mandates. Included in these are the City's Progress Guide and General Plan, the CEQA of 1970, and Section 106 of the NHPA of 1966. The intent of the City's guidelines is to ensure consistency in the identification, evaluation, preservation/mitigation, and development of the City's historical resources. These guidelines are also reflected in Section 5.5 (Historical Resources) of the Final Program Environmental Impact Report for the Otay Mesa Community Plan Update, City of San Diego (City of San Diego 2013).

The criteria used by the City to determine significance for historical resources reflect a more local perspective of historical, architectural, and cultural importance for inclusion on the City's Historical Resources Register. The resource can meet one or more of the following criteria:

a. Exemplifies or reflects special elements of the city's, a community's, or a neighborhood's historical, archaeological, cultural, social, economic, political, aesthetic, engineering, landscaping, or agricultural development.

b. Is identified with persons or events significant in local, state, or national history.

c. Embodies distinctive characteristics of a style, type, period, or method of construction or is a valuable example of the use of indigenous materials or crafts.

d. Is representative of the notable work of a master builder, designer, architect, engineer, landscape architect, interior designer, artist, or craftsman.

e. Is listed or has been determined eligible by National Park Service for listing on the National Register of Historic Places or is listed or has been determined eligible by the State Historical Preservation Office for listing on the State Register of Historic Resources.

f. Is a finite group of resources related to one another in a clearly distinguishable way or is a geographically definable area or neighborhood containing improvements which have a special character, historical interest, or aesthetic value, or which represent one or more architectural periods or styles in the history and development of the city.

Unless demonstrated otherwise, archaeological sites with only a surface component are not typically considered significant. The determination of an archaeological site's significance depends on a number of factors specific to that site including size, type, integrity, presence or absence of a subsurface deposit, soil stratigraphy, features, diagnostic artifacts, or datable material; artifact/ecofact density; assemblage complexity; cultural affiliation; association with an important person or event; and ethnic importance. Under the City's guidelines, all archaeological sites are considered potentially significant (City of San Diego 2001:13).

Under the City's Historical Resources Guidelines for the Land Development Code there are historical resource types which are typically considered insignificant for planning purposes. These are isolates, sparse lithic scatters, isolated bedrock milling features, shellfish processing stations, and sites and buildings less than 45 years old (City of San Diego 2001:13).

5.2 Recommendations

No cultural resources were found during the survey. No evidence of CA-SDI-12,337 or CA-SDI-7208 was observed during the survey; therefore, their boundaries do not appear to extend into the APE. The proposed project will not adversely affect historic properties as defined under Section 106 or historical resources as defined under CEQA and City guidelines. However, because the ground visibility was limited during the survey and because of the number of recorded cultural resources in the vicinity, RECON recommends ground-disturbing work such as grubbing/weed dethatching and recontouring/grading be monitored by a qualified archaeologists and a Native American monitor.

6.0 Certification and Project Staff

This report was prepared in compliance with CEQA (Section 21083.2 of the Statutes and Appendix K of the Guidelines) and with policies and procedures of the City and in compliance with Section 106 of the NHPA. To the best of our knowledge, the statements and information contained in this report are accurate.

Resumes for key personnel are on file with the City. The following individuals participated in the field tasks or preparation of this report.

Carmen Zepeda-Herman, RPA	Principal Investigator
Harry J. Price	Field Archaeologist
Corel Taylor	Native American Monitor
Frank McDermott	GIS Coordinator
Stacey Higgins	Senior Production Specialist

Please contact me if you have any questions or comments (czepeda@reconenvironmental.com or 619-308-9333 x133).

Sincerely,

Carmen Zepeda-Herman

Carmen Zepeda-Herman
Principal Investigator

CZH:sh

Attachments

cc: James Arnhart, City of San Diego
Karl Lintvedt, City of San Diego
Amy Mills, City of San Diego
Mastaneh Ashrafzadeh, City of San Diego

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ATTACHMENT 1

NAHC Correspondence

NATIVE AMERICAN HERITAGE COMMISSION
Cultural and Environmental Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
Phone: (916) 373-3710
Email: nahc@nahc.ca.gov
Website: http://www.nahc.ca.gov
Twitter: @CA_NAHC

April 23, 2019

Harry J. Price
RECON

VIA Email to: hprice@reconenvironmental.com

RE: La Media Road Widening Project, San Diego County.

Dear Mr. Price:

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: katy.sanchez@nahc.ca.gov .

Sincerely,

Katy Sanchez

KATY SANCHEZ
Associate Environmental Planner

Attachment

Native American Heritage Commission
Native American Contacts List
4/22/2019

Campo Band of Diegueño Mission Indians
Ralph Goff, Chairperson
36190 Church Road, Suite 1 Diegueno/Kumeyaay
Campo ,CA 91906
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Ewiiaapaayp Band of Kumeyaay Indians
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(619) 445-9126 Fax

Ewiiaapaayp Band of Kumeyaay Indians
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(619) 445-6315
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Iipay Nation of Santa Ysabel
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Santa Ysabel ,CA 92070
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(760) 765-0320 Fax

Jamul Indian Village
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(619) 669-4817

Jamul Indian Village
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Kumeyaay Cultural Repatriation Committee
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Kwaaymii Laguna Band of Mission Indians
Carmen Lucas
P.O. Box 775 Diegueno-Kwaaymii
Pine Valley ,CA 91962 Kumeyaay
(619) 709-4207

La Posta Band of Diegueño Mission Indians
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Manzanita Band of Kumeyaay Nation
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This list is current as of the date of this document and is based on the information available to the Commission on the date it was produced.

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 Resources Code, or Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans Tribes for the proposed: La Media Road Widening Project, San Diego County.

Native American Heritage Commission
Native American Contacts List
4/22/2019

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Viejas Band of Kumeyaay Indians
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This list is only applicable for contacting local Native Americans Tribes for the proposed: La Media Road Widening Project, San Diego County.

CONFIDENTIAL ATTACHMENT 1

Records Search

Not for Public Review