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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 La Media Road Improvement Project, San Diego, California (WBS #S-15018; PTS 667298; 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 in the city of San Diego, south of State Route 905 (SR-905), north of Siempre Viva Road, east of Britannia Road, and west of the Otay Mesa border crossing (Figure 1). The City proposes to upgrade the existing La Media Road from a two-lane road to a six-lane road to ease traffic congestion. Work will also be done on portions of Airway Road where it intersects La Media Road.

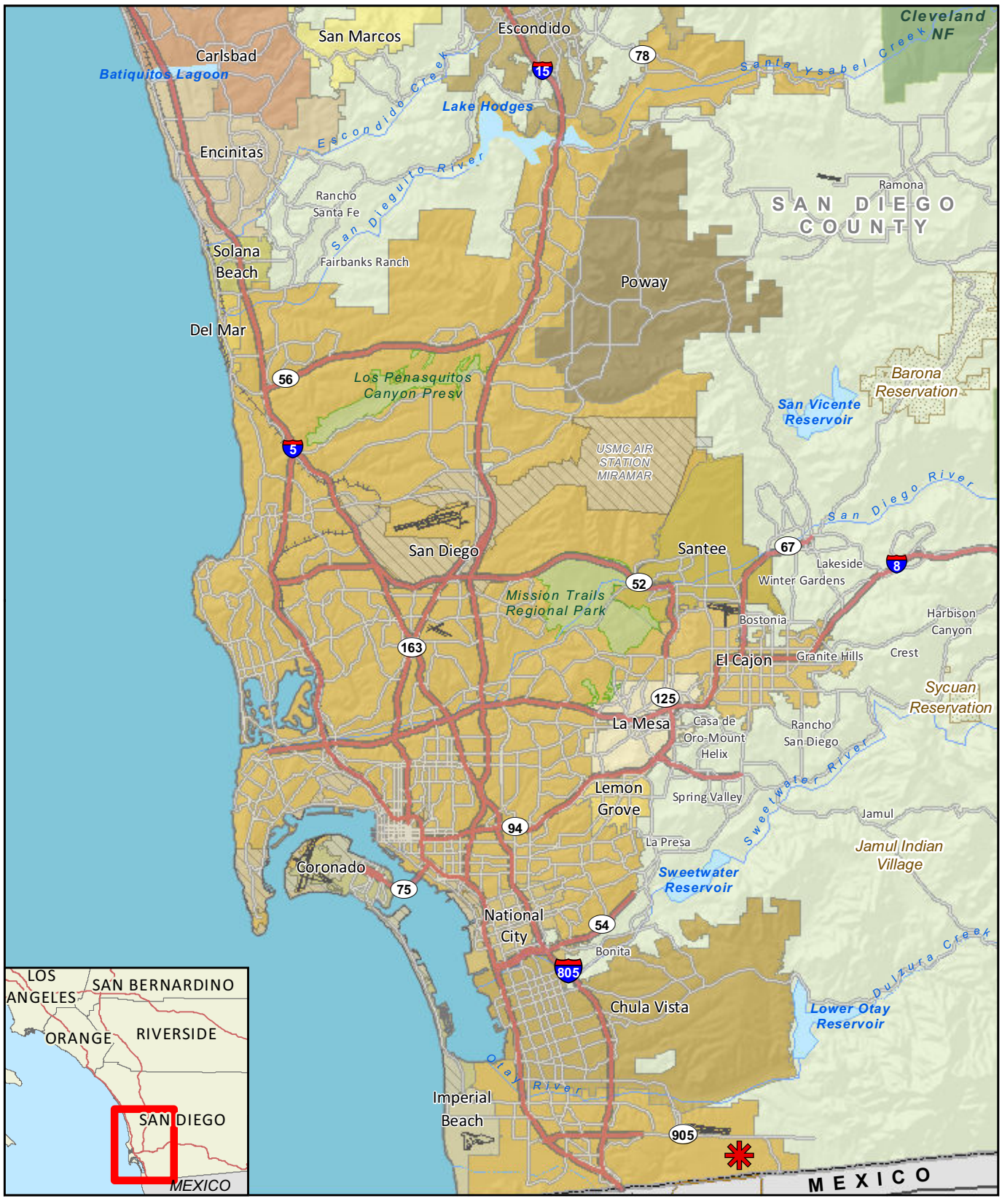
The project site is found in the east ¼ of Section 34 and the west ¼ of Section 35, Township 18 South, Range 01 West, of the U.S. Geological Survey 7.5-minute topographic map, Otay Mesa quadrangle (Figure 2; USGS 1994). The project is also shown on the City of San Diego 800' scale maps (Figure 3). Commercial/Industrial development occurs to the east, northeast, and southeast of the project, while vacant land occurs to the west (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, the west end of the San Ysidro Mountains.

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).



Project Location

FIGURE 1
Regional Location
La Media Road Widening Project

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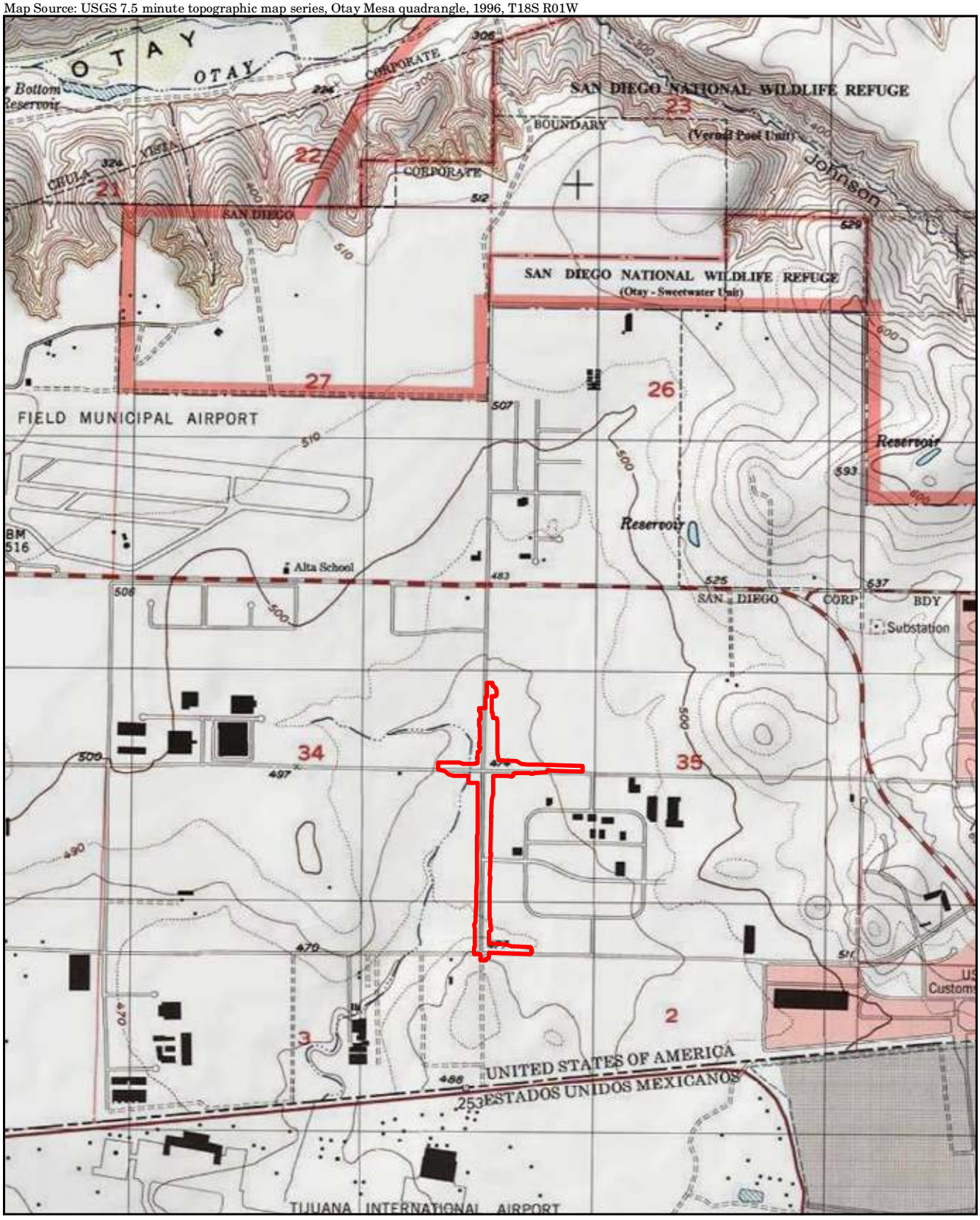
Map Source: USGS 7.5 minute topographic map series, Otay Mesa quadrangle, 1996, T18S R01W



0 Feet 2,000

Project Boundary

FIGURE 2

Project Location on USGS Map
La Media Road Widening Project

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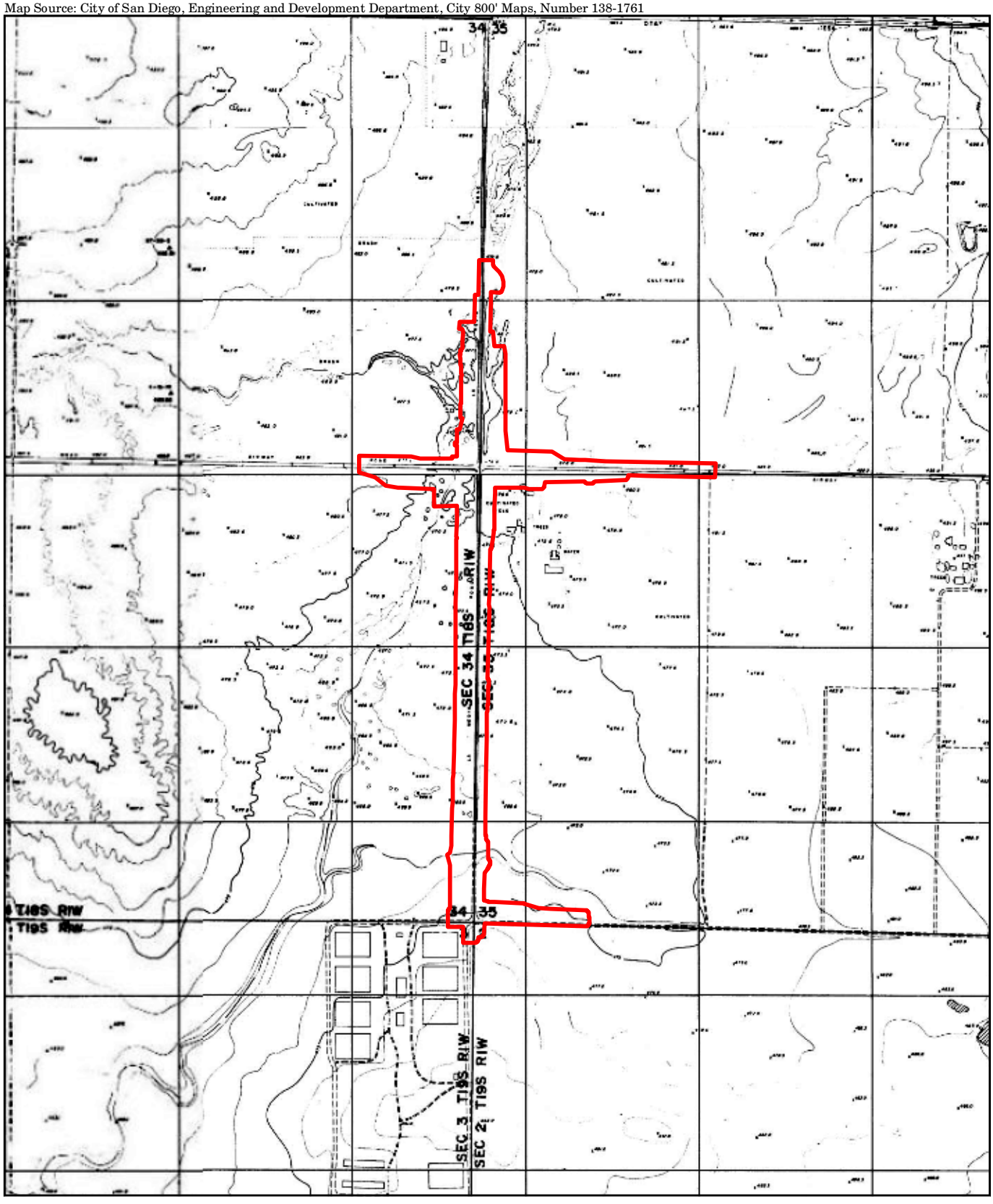
Map Source: City of San Diego, Engineering and Development Department, City 800' Maps, Number 138-1761



Project Boundary

FIGURE 3

Project Location on City 800' Map

La Media Road Widening Project

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Image Source: Nearmap (flown September 2019)

FIGURE 4
Project Location on Aerial Photograph
La Media Road Widening Project

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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 majority 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, and 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 Airway Road and at the extreme northern edge 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 and exotic weeds. Dominant species include dense stands of black mustard with only a few other herbaceous species. These scattered herbaceous species occur in the open areas within the mustard and include fennel (*Foeniculum vulgare*), bristly ox-tongue (*Helminthotheca echioides*), tumbleweed (*Amaranthus albus*), hedge mustard (*Sisymbrium officinale*), cheeseweed (*Malva parviflora*), and pigweed (*Chenopodium album*). 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, immediately 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 area of potential effect (APE) is considered for this report to include both permanent and temporary construction impacts. The APE consists of approximately 25.58 acres.

3.0 Study Methods

Site record searches were conducted through the California Historical Resources Information System, South Coastal Information Center (SCIC) at San Diego State University (Confidential Attachment 1).

The project was surveyed on March 19, 2019, by RECON archaeologists accompanied by a Native American monitor from Red Tail Environmental. The field inspection was conducted on foot, in conditions of sunny, warm weather and bright daylight. The survey area consisted of the entire project impact area.

4.0 Survey Results

4.1 Record Search

A records search with a one-half mile radius buffer was requested from the California Historical Resources Information System, SCIC at San Diego State University in order to determine if previously recorded prehistoric or historic cultural resources occur on the property. The SCIC lists a total of 33 cultural resources within the one-half mile search radius. Record search results maps and resource lists are included in Confidential Attachment 1. RECON completed an in-house records search to complete a one-mile search radius. An additional 54 cultural resources have been recorded for a total of 87 cultural resources within a one-mile radius.

The SCIC lists two prehistoric archaeological sites, CA-SDI-12,337 and CA-SDI-7208, recorded within the project boundary. CA-SDI-12,337 is mapped in the northeast quarter of the intersection of La Media Road and Airway Road. The site extends north along the east side of La Media Road for approximately 2,000 meters and along the north side of Airway Road for approximately 1,700 meters. CA-SDI-12,337 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, including over three-quarter of Section 26 and the north one-half of Section 35. During the Lin project survey, which included the current project property, Ms. Robbins-Wade noted many flakes, cores, and tools. How many of these were found on the current project property could not be determined from the available information.

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 is mapped in the northwest quarter of the La Media Road/Airway Road intersection. The site extends west to Britannia Boulevard, north to Otay Mesa Road, and south to the international border. It 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. The site consists of a light lithic scatter covering the entire site area with scattered areas of concentrated artifacts. 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. The record search maps are included as Confidential Attachment 1. Historic aerial photographs were also checked in order to see past development within and near the project area.

A letter was sent to the Native American Heritage Commission (NAHC) in Sacramento on March 25, 2019, requesting a search of their Sacred Lands File. The NAHC indicated that their search was negative on April 23, 2019 (Attachment 1).

4.2 Survey Results

The field survey of the main project parcel was conducted on March 19, 2019 by RECON archaeologists Harry J. Price and Nathanial Yerka, accompanied by Shuuluk Linton, a Native American Monitor from Red Tail Environmental. The project area was revised and extended approximately 186 meters (611 feet) east along Siempre Viva Road in January 2020. This additional portion was not surveyed. Based on an aerial photograph, this area has been heavily disturbed and has a low likelihood of containing significant cultural resources.

The project property is basically flat and has been impacted by construction of La Media Road and Airway Road. In addition, construction of commercial and industrial projects along the eastern side of La Media Road and the south side of Airway Road (east of the intersection) has heavily disturbed the proposed project.

Beginning with the portion of the project north of the La Media Road/Airway Road intersection, the project area on the east side of La Media Road is dominated by a drainage ditch varying in width between 15 and 25 meters, currently overgrown with riparian and non-native vegetation (Photograph 1). Ground visibility was zero percent in and on either side of the ditch. This area was not walked because of the vegetation and the presence of some standing water. The portion of the project east of the riparian area varies between 7 and 25 meters, and is covered in a dense growth of non-native annuals. Ground visibility in this area was also less than 5 percent and it was not surveyed.

The portion of the project west of La Media Road and north of Airway Road has also been impacted by construction of a drainage ditch for much of its width, which varies between approximately 10 and 15 meters from the road edge (Photograph 2). Riparian vegetation covered the ditch sides and bottom, and there was some standing water. For the last 50 meters before the intersection the project widens to approximately 25 meters, but due to the winter rains this expanded area was also densely vegetated with a combination of cattails, non-native grasses and annuals, and some willows. It was also partially inundated, and was not walked.

South of Airway Road, the project area on the east side of La Media Road, varying between approximately 15 and 25 meters wide from the road edge, has been impacted by development of several trucking-related storage yards and, for the southern 235 meters of the project, a large detention basin (Photographs 3 and 4). No undisturbed ground remains. The project area consists of dirt and gravel road shoulder, paved driveways, and landscaped sections covered with grass and trees. In some places the project extends a short distance into the truck parking yards, but as these are either graveled or blacktopped, they were not surveyed. The project area on the west side of La Media Road south of Airway Road, varying between approximately 16 and 20 meters in width, is undeveloped. Vegetation in this portion of the project is also very dense non-native annuals and grasses and ground visibility was below five percent (Photograph 5). An area approximately 100 meters long near the La Media Road/Airway Road intersection has been bladed in the past, but vegetation was so dense little evidence of this could be seen. The project area widens to 60 meters for the approximately 58 meters in the southwest corner of the La Media Road/Airway Road intersection. This area consists of a marsh with a combination of native and non-native plants and trees. Much of the center of the area is dense cattails with willows and a few palm trees adjacent to Airway Road (Photograph 6). Ground visibility averages less than 5 percent. There are few areas of where ground visibility was better, up to 30 percent.

PHOTOGRAPH 1
Looking North on East Side of La Media Road, North of Airway Road, Showing Drainage Ditch and Vegetation

PHOTOGRAPH 2
Looking South at Project West of La Media Road and North of Airway Road Showing Ditch and Vegetation

PHOTOGRAPH 3
Looking North along East Side of La Media Road South of Airway Road Showing Development and Dirt Shoulder

PHOTOGRAPH 4
Looking North along East Side of La Media Road Showing Detention Basin

PHOTOGRAPH 5
View of Project on West Side of La Media Road South of Airway Road
Showing Dense Ground Cover

PHOTOGRAPH 6
Southwest Corner of La Media Road/Airway Road Intersection
Showing Dense Vegetation

The portion of the project on Airway Road east of the La Media Road/Airway Road intersection is partially developed. The project on the south side of Airway Road, averaging approximately 20 meters wide from the road edge, has been impacted by trucking related properties with a shoulder and landscaped edge approximately 13 meters wide. The majority of the width is a dirt and gravel shoulder. Landscaped areas are grass and trees with a concrete curb (Photograph 7). Ground visibility was 100 percent in the shoulder and approximately 30 percent in the landscaped areas. The project extends a short distance into the truck parking yards, but as these are either graveled or blacktopped, they were not surveyed. The project area on the north side of Airway Road, varying between approximately 12 and 25 meters wide, is undeveloped. Adjacent to the road is a dirt and gravel shoulder averaging 5 to 6 meters wide. North of this is a drainage ditch approximately 8 meters wide. The ditch is covered in non-native annuals and grasses, and there was little standing water in the ditch. Ground visibility in the ditch averaged below 5 percent. North of the ditch, the field was covered in dense mustard and other non-naïve annuals (Photograph 8). Ground visibility was also below 5 percent. The project on the north side of Airway Road, west of the intersection, is narrow and consists of a strip of non-native grasses and annuals and a bare dirt path. This area has been disturbed by construction of Airway Road. Ground visibility averaged 50 percent. On the south side of Airway Road the project width varied between 18 and 30 meters from the edge of the road. Vegetation consisted of non-native grasses and annuals with a few scattered native shrubs (Photograph 9). Ground visibility was low, averaging 10 percent except for a narrow path adjacent to the road. 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.

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 the 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.

PHOTOGRAPH 7
Looking East on the South Side of Airway Road East of La Media Road
Showing Shoulder, Curb, and Landscaping

PHOTOGRAPH 8
North Side of Airway Road, East of La Media Road, Showing Shoulder
and Vegetation in the Drainage Ditch and Adjacent Field

PHOTOGRAPH 9
South Side of Airway Road, West of La Media Road, Showing Dense Ground Cover Vegetation

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 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 Section 5024 of the Public Resources Code, and CEQA Guidelines 15064.5(c).

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 California Environmental Quality Act of 1970, and Section 106 of the National Historic Preservation Act 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 Evaluation of Resources

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. Portions of both sites have been tested in the past and all tests have produced a determination of not significant under both City of San Diego and CEQA guidelines. Because of the repeated testing of other portions of both sites with determinations of not significant and the lack of observed artifacts in the project, RECON does not recommend a testing program for the portion of either CA-SDI-12,337 or CA-SDI-7208 on the La Media Road Improvement Project property.

RECON also recommends no additional cultural resources work, such as construction monitoring, for this project. This recommendation is based on the fact that the majority of the proposed project has been disturbed to varying degrees by construction or excavation of drainage ditches. Also, no previously unrecorded cultural resources were identified during the survey, and that tests of the two previously recorded sites within the project have consistently determined the sites are not significant historical resources. The proposed project will not adversely affect historic properties as defined under Section 106 nor historical resources as defined under CEQA and City guidelines.

6.0 Certification and Project Staff

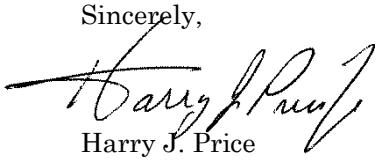
This report was prepared in compliance with CEQA (Section 21083.2 of the Statutes and Appendix K of the Guidelines) and with policies and procedures of the City and in compliance with Section 106 of the NHPA. To the best of our knowledge, the statements and information contained in this report are accurate.

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

Harry Price	Principal Investigator
Carmen Zepeda-Herman, RPA	Senior Reviewer
Nathanial Yerka	Field Archaeologist
Shuuluk Linton	Native American Monitor
Frank McDermott	GIS Coordinator
Stacey Higgins	Senior Production Specialist

Please contact me if you have any questions or comments (hprice@reconenvironmental.com or 619-308-9333 x103).

Sincerely,



Harry J. Price
Principal Investigator

Carmen Zepeda-Herman
Archaeology Project Director

HJP:sh

Attachments

7.0 References Cited

Abbott, Patrick L.
1999 *The Rise and Fall of San Diego*. Sunbelt Publications, San Diego, California.

Christenson, Lynne
1989 The late Prehistoric Yuman People of San Diego County, California: their Settlement and Subsistence System. Unpublished PhD dissertation, Dept. of Anthropology, Arizona State University.

Holland, Robert F.
1986 Preliminary Descriptions of the Terrestrial Natural Communities of California. Nongame Heritage Program, California Department of Fish and Game, Sacramento.

Kyle, Carolyn, Roxana L. Phillips, Adella B. Schroth, and Sinéad Ní Ghabhláin
1996 Cultural Resources Survey and Test Report for the Otay Mesa Road Widening Project. Unpublished manuscript on file at the SCIC, San Diego State University, San Diego, CA.

Robbins-Wade, Mary
1990 Prehistoric Settlement Patterns of Otay Mesa, San Diego, California. Unpublished master's theses, San Diego State University, California.

2002 Archaeological Resources Survey of the Lin Site, Otay Mesa, San Diego, California. Unpublished manuscript on file at the SCIC, San Diego State University, San Diego, CA.

2007 Archaeological Resources Inventory, Piper Otay Park Project, Otay Mesa, San Diego, California. Unpublished manuscript on file at the SCIC, San Diego State University, San Diego, CA.

San Diego, City of
2001 *Historical Resources Guidelines*. San Diego Municipal Land Development Code, San Diego, California.

2013 Final Program Environmental Impact Report for the Otay Mesa Community Plan Update. December 18.

U.S. Department of Agriculture
1973 Soil Survey, San Diego Area, California. Edited by Roy H. Bowman. Soil Conservation Service and Forest Service. December.

ATTACHMENT 1

NAHC Search Results

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
rgoff@campo-nsn.gov
(619) 478-9046
(619) 478-5818 Fax

Ewiiaapaayp Band of Kumeyaay Indians
Robert Pinto Sr., Chairperson
4054 Willows Road Diegueno/Kumeyaay
Alpine ,CA 91901
wmicklin@leaningrock.net
(619) 445-6315
(619) 445-9126 Fax

Ewiiaapaayp Band of Kumeyaay Indians
Michael Garcia, Vice Chairperson
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michaelg@leaningrock.net
(619) 445-6315
(619) 445-9126 Fax

Iipay Nation of Santa Ysabel
Virgil Perez, Chairperson
P.O. Box 130 Diegueno/Kumeyaay
Santa Ysabel ,CA 92070
(760) 765-0845
(760) 765-0320 Fax

Jamul Indian Village
Erica Pinto, Chairperson
P.O. Box 612 Diegueno/Kumeyaay
Jamul ,CA 91935
epinto@jiv-nsn.gov
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(619) 669-4817

Jamul Indian Village
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lcumper@jiv-nsn.gov
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(619) 669-4817 Cell

Kumeyaay Cultural Repatriation Committee
Clint Linton, Director of Cultural Resources
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Santa Ysabel ,CA 92070
cjlinton73@aol.com
(760) 803-5694

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
Gwendolyn Parada, Chairperson
P. O. Box 1120/ 8 Crestwood Road Diegueno/Kumeyaay
Boulevard ,CA 91905
LP13boots@aol.com
(619) 478-2113
(619) 478-2125 Fax

Manzanita Band of Kumeyaay Nation
Angela Elliott-Santos, Chairperson
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(619) 766-4930
(619) 766-4957 Fax

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

Sycuan Band of the Kumeyaay Nation
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Viejas Band of Kumeyaay Indians
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1 Viejas Grade Road Diegueno/Kumeyaay
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jhagen@viejas-nsn.gov
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(619) 445-5337 Fax

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.

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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