



Results of Historical Resources Survey of the La Media Retail Project San Diego, California

Prepared for
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A handwritten signature in black ink, appearing to read "Harry J. Price".

Harry J. Price, Principal Investigator

NATIONAL ARCHAEOLOGICAL DATA BASE INFORMATION

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USGS Quadrangle Map: Otay Mesa, California, quadrangle, 1994 edition

Acreage: 23.9 acres

Keywords: Historical resources survey, positive survey, CA-SDI-12337, Otay Mesa, La Media Road, CA-SDI-5352, CA-SDI-9974, CA-SDI-10072, CA-SDI-10735, City of San Diego, prehistoric resources, sparse lithic scatter

RECON conducted a survey of the La Media Retail Project parcel on July 10, 2014. The project parcel is 17.6 acres. Ground visibility varied substantially within the project area. The off-site improvement area, consisting of an additional 6.3 acres located on the edges of the project area, was surveyed on April 6, 2016 and August 23, 2017, by RECON archaeologists Harry Price and Nathaniel Yerka, accompanied by Native American monitors Tushon Phoenix and Gabe Kitchen Jr. Dense dead mustard plants covered the center and northeastern portions of the parcel. Ground visibility in these areas averaged under 15 percent. The western end and southeast portions of the project area had much shorter weed cover, with areas of bare or almost bare dirt. Ground visibility on these areas varied between 50 percent and 95 percent.

No previously unrecorded prehistoric historical resources were found during the survey. Limited evidence of CA-SDI-12337 was observed during the survey. Two fine-grained metavolcanic cores were found during the survey. In addition, several scattered flakes were seen. No milling implements or tools were observed. Artifact density was very sparse, with no artifacts within 30 meters of others.

Had the area not already been mapped as part of CA-SDI-12337, the artifacts identified during the project surveys would have been considered isolates and not significant historical resources. Various portions of CA-SDI-12337 have been tested in the past for significance, including Couples and Eidsness 1978, Gallegos et al. 1992, Kyle and Gallegos 1992a-1992e, Serr and Saunders 1994, and Kyle et al. 1996. In all cases, the portion of CA-SDI-12337 (or the portion originally called CA-SDI-5252) being tested was determined not to be a significant historical resource. Testing found low densities of surface and subsurface artifacts, lack of intact subsurface midden deposits or the presence of features, lack of surface or subsurface integrity, and a lack of data capable of addressing substantive research questions.

Because of the small number of artifacts observed, lack of artifact concentrations, and the repeated testing of other portions of the site with determinations of not significant, RECON does not recommend a testing program for the portion of CA-SDI-12337 on the La Media Retail Project property. All previous testing programs of other parts of CA-SDI-12337 have determined the site is not a significant historical resource. The lack of observed artifacts, lack of midden type soil, and the history of farming-related disturbance on the project portion of the site indicate that the results of any testing program would produce the same not significant results.

The Native American community has recommended that a Native American monitor be present for ground-disturbing activities on the La Media Retail Project property. RECON recommends a qualified archaeological monitor be present for all ground-disturbing activities in case unexpected intact subsurface features are uncovered.

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1.0 Management Summary

This report summarizes the results of the historical resources field and archival investigation of the La Media Retail Project (project), located within the Otay Mesa area of the city of San Diego. The project is on the north side of State Route 905 (SR-905), east of La Media Road. The project totals 23.9 acres: 17.6 acres in the project parcel and 6.3 acres in the off-site improvement area. Both the project parcel and the off-site improvement areas are currently fallow agricultural fields.

RECON conducted a record search of the archaeological databases maintained at the California Historical Resources Information System, South Coastal Information Center at San Diego State University (SCIC). The files at SCIC have a single large site, CA-SDI-12337, covering the entire project site.

No previously unrecorded prehistoric historical resources were found during the survey. Limited evidence of CA-SDI-12337 was observed during the survey. One fine-grained metavolcanic core and a few flakes was found during the July 10, 2014 survey. In addition, a core and a few scattered flakes were seen on the off-site improvement area, surveyed on April 6, 2016 and August 23, 2017. No milling implements or tools were observed. Artifact density was very sparse, with no two artifacts within 30 meters of others.

Various portions of CA-SDI-12337 have been tested in the past for significance, including Couples and Eidsness 1978, Gallegos et al. 1992, Kyle and Gallegos 1992a-1992e, Serr and Saunders 1994, and Kyle et al. 1996. In all cases, the portion of CA-SDI-12337 (or the portion originally called CA-SDI-5252) being tested was determined not to be a significant historical resource. Testing found low densities of surface and subsurface artifacts, lack of intact subsurface midden deposits or the presence of features, lack of surface or subsurface integrity, and a lack of data capable of addressing substantive research questions.

Applying the Historical Resources Guidelines and mitigation measures described in the Otay Mesa Community Plan Update EIR, RECON has determined that, because of the small number of artifacts observed, lack of artifact concentrations, and the repeated testing of other portions of the site with determinations of not significant, a testing program for the portion of CA-SDI-12337 on the project property is not recommended. All previous testing programs of other parts of CA-SDI-12337 have determined the site is not a significant historical resource. The lack of observed artifacts, lack of midden type soil, and the history of farming-related disturbance on the project portion of the site indicate that the results of any testing program would produce the same not significant results.

The Native American community has recommended that a Native American monitor be present for ground-disturbing activities on the project property. RECON recommends a qualified archaeological monitor be present for all ground-disturbing activities in case unexpected intact subsurface features are uncovered.

2.0 Introduction

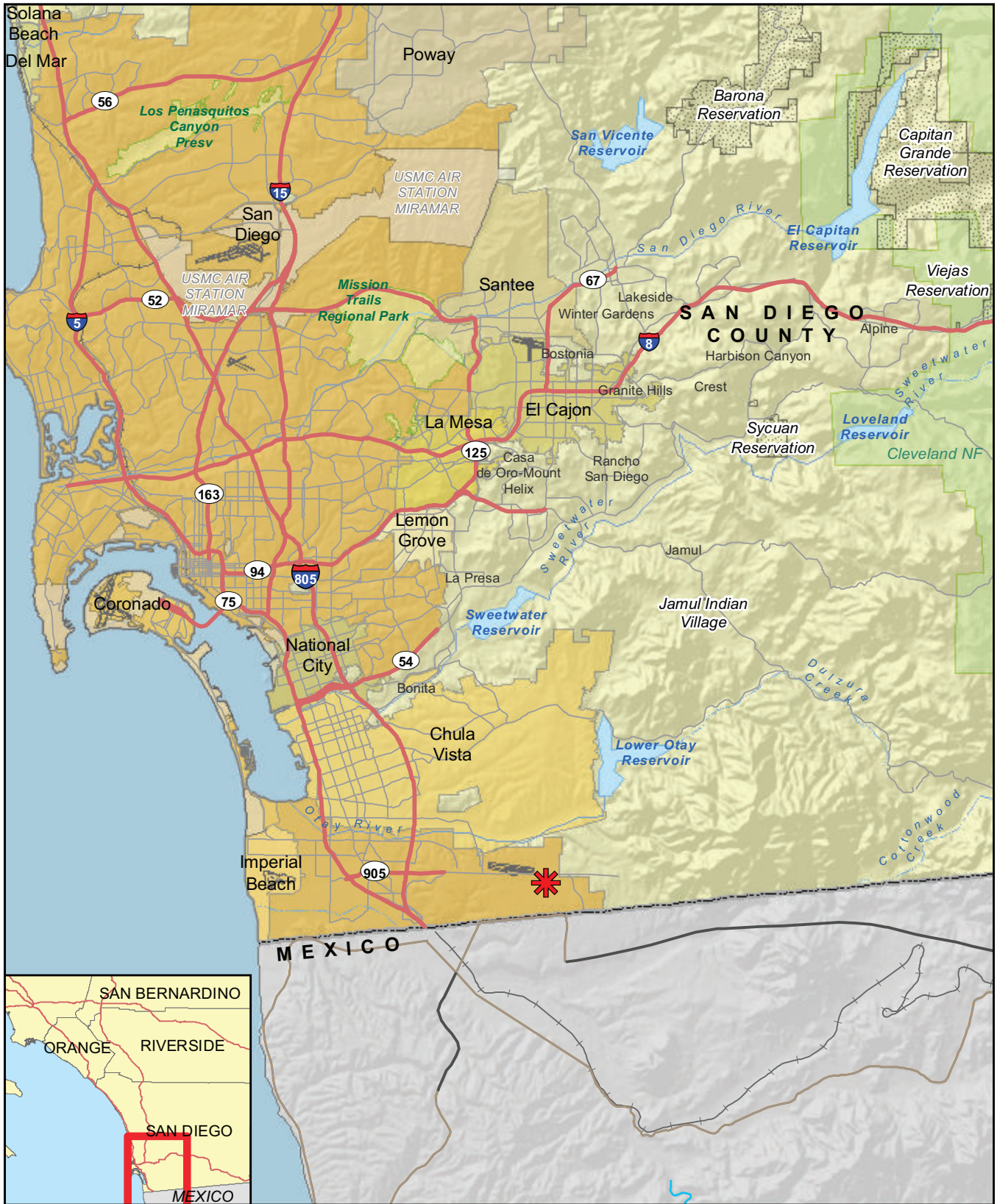
This report describes the results of the historical resource survey conducted for the project. The project site is located in the city of San Diego, south of Otay Mesa Road, north of Airway Road, east of La Media Road, and north of SR-905 (Figure 1). The project site would be subdivided into 12 lots, eight of which would have a single commercial building each. Lot 4 would have two commercial buildings. Lot 7 would consist solely of a paved parking area, and Lots 11 and 12 would consist solely of landscaping and bioretention basins. The majority of the project site would consist of a paved parking lot and the project would include construction of storm drains and infrastructure for water and sewer connections. Lots 1, 2, and 5 would also include covered truck loading docks at the rear of each commercial building, facing SR-905. The main project access would be from Otay Mesa Road, via the proposed Avenida Costa Azul access drive on the eastern project boundary. The project would also include a 0.4-acre public right-of-way dedication to widen the northbound segment La Media Road adjacent to the project's western boundary. Right-in, right-out only access to the site would also be provided via La Media Road.

The project site is found in the northwest $\frac{1}{4}$ of the northwest $\frac{1}{4}$ of Section 35, Township 18 South, Range 1 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 north, west, and southeast of the project, while vacant land occurs to the south and east (Figure 4). Brown Field Municipal Airport is to the northwest of the project, and SR-125 is approximately $\frac{1}{2}$ mile to the east. Both the project site and the adjacent vacant lands have been extensively tilled for agriculture, although the majority of the land is currently fallow.

3.0 Physical and Cultural Setting

3.1 Physical Setting

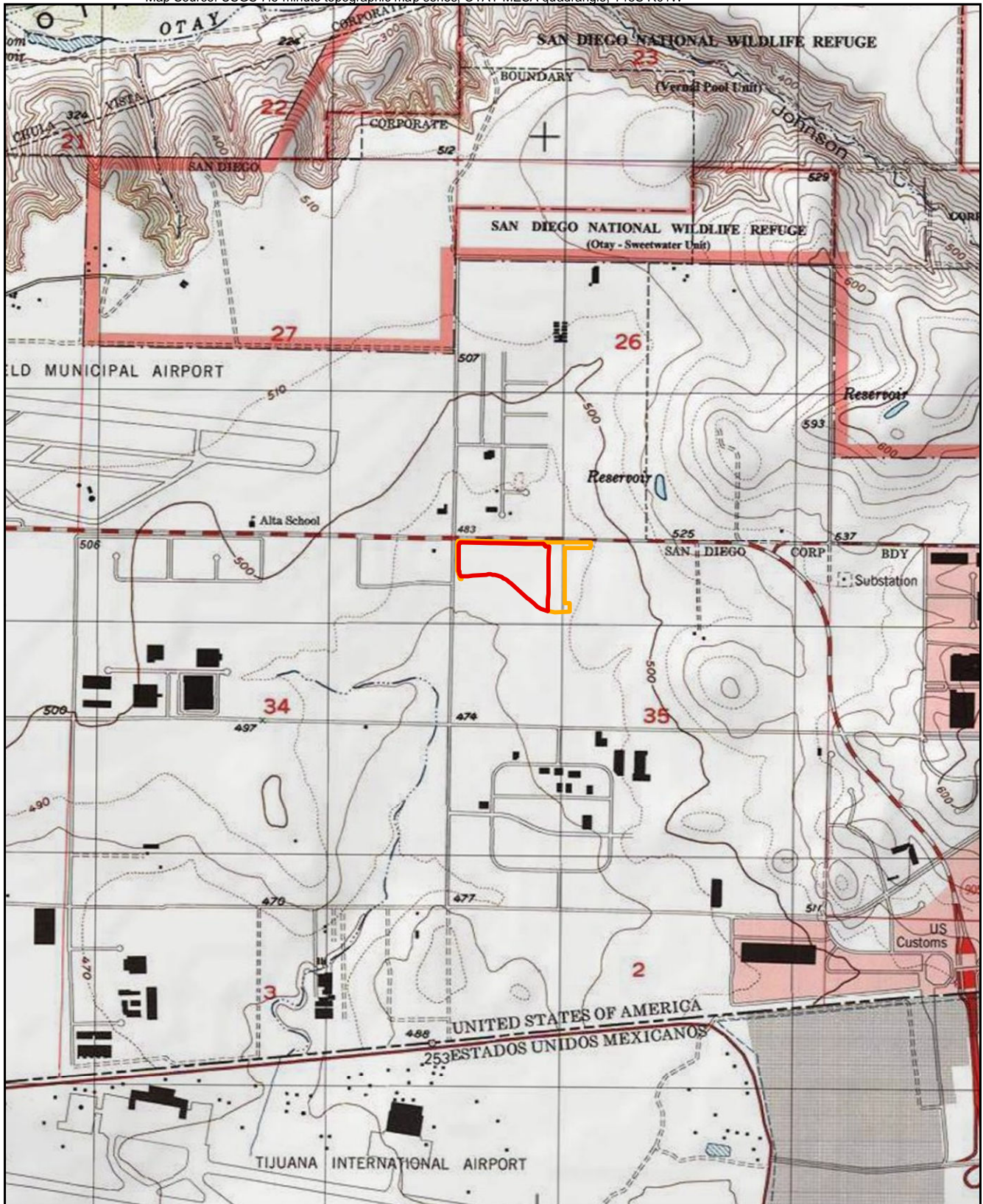
The project is roughly in the middle of the Otay Mesa marine terrace (see Figure 2). Otay Mesa begins approximately 5.5 miles east of the Pacific Ocean, rising rather sharply from an elevation about 60 feet above mean sea level (AMSL) in the Tijuana River and Otay River mouths, to an elevation around 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.-Mexican border. The eastern end of Otay Mesa is Otay Mountain, the west end of the San Ysidro Mountains.





 Project Location

FIGURE 1

Regional Location



-  Project Boundary
-  Off-site Survey Area

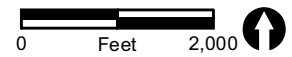
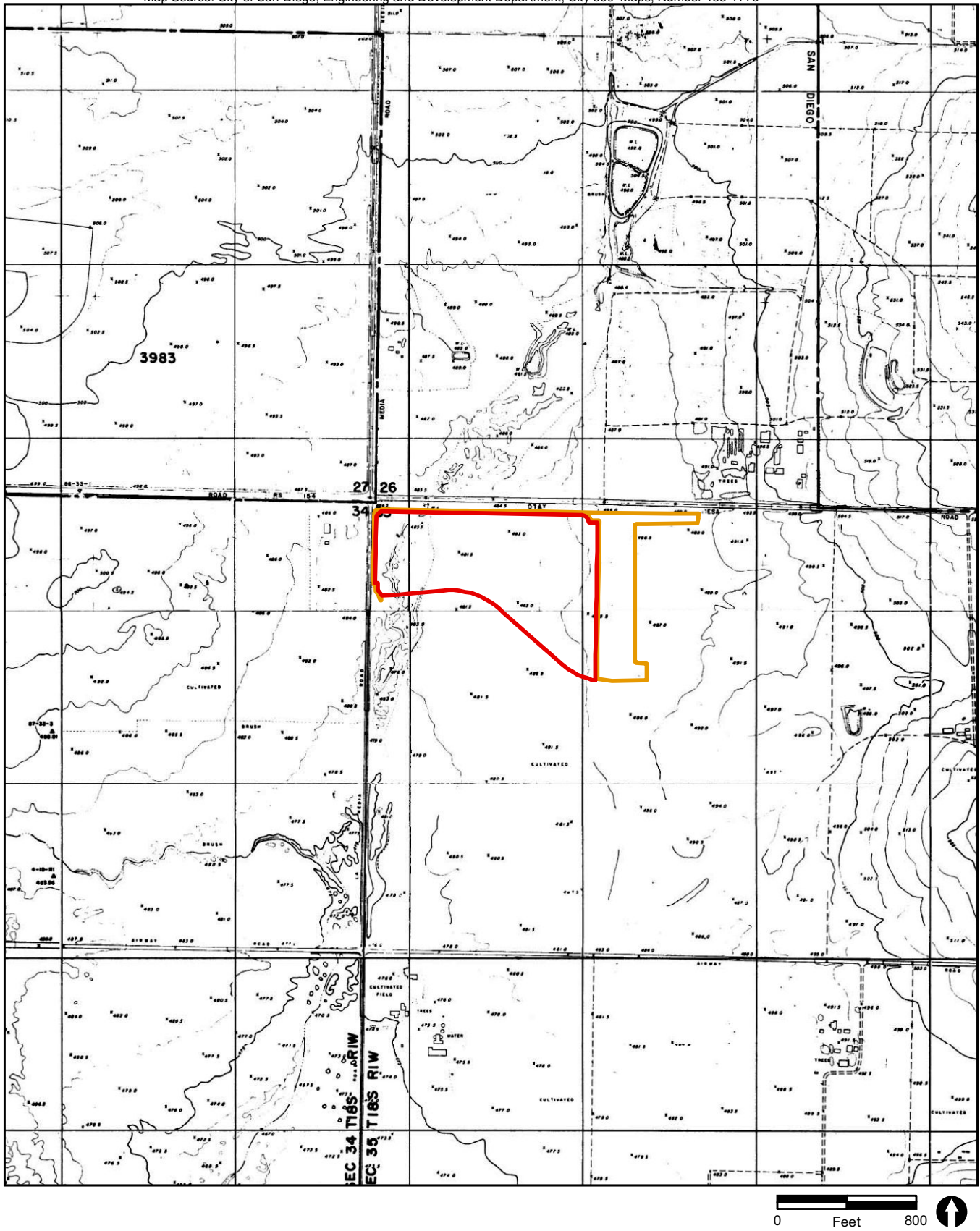


FIGURE 2
Project Location on USGS Map







-  Project Boundary
-  Off-site Survey Area

FIGURE 3

Project Location on City 800' Map



-  Project Boundary
-  Off-site Survey Area

0 Feet 200 

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).

One soil type is mapped in the survey area, Salinas clay 0 to 2 percent slopes. Salinas series soils consist of well drained and moderately well drained clay loams that form in sediments from Diablo, Linne, Las Flores, Huerhuero, and Olivenhain soils. Salinas soils occur in floodplains and alluvial fans, and have slopes of no more than 9 percent. A representative soil profile has a surface layer of neutral to mildly alkaline clay loam that is approximately 22 inches thick. The next layer is composed of mildly to moderately alkaline calcareous clay loam about 24 inches thick. The substratum is moderately alkaline calcareous clay loam and loam that can reach a depth of over 60 inches (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 (*Arctostaphylos* 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.

3.2 Cultural Setting

3.2.1 Prehistoric Period

The prehistoric cultural sequence in San Diego County is generally conceived as comprising 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 Jollan 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 Jollan Complex along the coast and the Pauma Complex inland. Pauma Complex sites lack the shell that dominates many La Jollan sites. Along with an economic focus on gathering plant resources, the settlement system appears to have been more sedentary. The La Jollan 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.

3.2.2 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 rancherías. 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 Brown ware, but some were decorated (Meighan 1954; May 1976, 1978).

3.2.3 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. Part of the western boundary of San Bernardo Rancho forms the eastern boundary of the project. San Bernardo Rancho, 17,763 acres in size, was comprised of two land grants given to Joseph F. Snook in 1842 and 1845 (Pourade 1969). Snook, a British sea captain, married Maria Antonia Alvarado, daughter of Don Juan Bautista Alvarado. Don Juan owned Rancho Rincon del Diablo, the rancho just east of San Bernardo (Pourade 1969).

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 1987). 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 the Great Depression.

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.

4.0 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 the entire project parcel and the off-site improvement area.

5.0 Study Methods

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

The project parcel (17.24 acres) was surveyed on July 10, 2014 by RECON archaeologists Carmen Zepeda-Herman and Harry Price. The RECON archaeologists were accompanied by Native American monitor Gabe Kitchen of Redtail Monitoring. The field inspection was conducted on foot, in conditions of sunny, warm weather and bright daylight. The survey area consisted of the entire project parcel.

A portion of the off-site improvement area on the perimeter of the project parcel was surveyed on April 6, 2016, by RECON archaeologist Harry Price, accompanied by Native American monitor Tushon Phoenix. The field inspection was conducted on foot, in conditions of sunny, warm weather and bright daylight. The survey area consisted of the entire off-site improvement area and a buffer approximately 8 meters wide on the eastern edge of the improvement area. An additional survey was conducted on August 23, 2017, for additional off-site improvement areas. That field inspection was conducted by RECON archaeologist Nathaniel Yerka and Native American monitor Gabe Kitchen on foot, in conditions of cloudy skies.

6.0 Survey Results

6.1 Record Search

A records search with a one-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 one prehistoric archaeological site, CA-SDI-12337, covering the entire project property and the off-site improvement area. CA-SDI-12337 includes four previously recorded sites, CA-SDI-5352, -9974, -10072, and -10735. 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 1995 as part of the Otay Mesa Road Widening project. The current CA-SDI-12337 covers over 700 acres, including over $\frac{3}{4}$ of Section 26 and the north $\frac{1}{2}$ 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-12337 have been tested in the past for various specific development projects, and these tests have determined the site lacks subsurface deposits and were not significant historical resources under City of San Diego criterion. The most recent survey of the property within CA-SDI-12337 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). The record search maps and site forms for CA-SDI-12337 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 July 14, 2014 requesting a search of their Sacred Lands File. The NAHC replied on July 18, 2014, indicating that they had no record of Native American cultural resources in the immediate area of the project. The response letter from the NAHC is included as Attachment 1. Letters were sent to the groups and individuals on an accompanying list in Attachment 1 on July 28, 2014. An email response was received on July 28, 2014 from Clinton Linton, representative of the Iipay Nation of Santa Ysabel requesting a Kumeyaay monitor for all ground-disturbing activities related to this project. A written response was received from the Viejas Band of Kumeyaay Indians on August 7, 2014. The letter requested additional information on the project and any archaeological site information. Harry Price of RECON contacted Julie Hagen of Viejas to discuss the project and the results of the survey and record search. Ms. Hagen requested that a Native American Cultural Monitor be on-site for all ground-disturbing activities. Copies of the correspondence are included in Attachment 2.

6.2 Survey Results

The field survey of the main project parcel was conducted on July 10, 2014 by RECON archaeologists Harry J. Price and Carmen Zepeda-Herman, accompanied by Gabe Kitchen, Native American Monitor from Red Tail Monitoring.

The project property is basically flat and has been impacted by a combination of farming and some road and drainage construction. The majority of the property has been tilled for agriculture since at least the early 1960s. The northwest corner of the project parcel has been graded as part of construction on Otay Mesa Road. The project parcel has not been tilled recently and there was little evidence of furrows.

Ground visibility varied substantially within the project area. Dense dead mustard plants covered the center and northeastern portions of the project parcel. Ground visibility in these areas averaged under 15 percent (Photograph 1). The western end and southeast portions of the project parcel had much shorter weed cover, with areas of bare or almost bare dirt (Photographs 2 and 3). Ground visibility on these areas varied between 50 percent and 95 percent.

No previously unrecorded prehistoric historical resources were found during the survey. Limited evidence of CA-SDI-12337 was observed during the survey. One fine-grained metavolcanic core was found in the east-central portion of the project during the survey. In addition, a few scattered flakes were seen. No milling implements or tools were observed. Artifact density was very sparse, with no artifacts within 30 meters of others.



PHOTOGRAPH 1
View of Dense Dead Mustard that Covers Parts of the Parcel



PHOTOGRAPH 2
Sparse Vegetation Covering Northwest Corner of the Parcel



PHOTOGRAPH 3
Sparse Vegetation Covering Southeast Portion of the Parcel

The initial off-site improvement area, located on the perimeter of the project parcel was conducted on April 6, 2016 by RECON archaeologist Harry Price, accompanied by Native American monitor Tushon Phoenix. Ground visibility averaged approximately 40 percent, with some scattered areas of 75 percent visibility. No previously unrecorded prehistoric historical resources were found during the survey. Limited evidence of CA-SDI-12337 was observed during the survey in the form of two fine-grained metavolcanic flakes.

The second off-site improvement area survey was conducted on August 23, 2017, by RECON archaeologist Nathaniel Yerka and Native American monitor Gabe Kitchen. Ground visibility was poor due to dense ground cover consisting of a combination of exotic grasses and black mustard, averaging less than 10 percent. The numerous rodent hole backdirt piles were examined for evidence of cultural material. Limited evidence of CA-SDI-12337 was observed during the survey in the form of one core and one flake, both in rodent backdirt piles. A portion of the off-site improvement area is within the existing Otay Mesa Road and La Media Road. These areas were not surveyed.

7.0 Evaluation and Recommendations

7.1 Regulatory Framework

According to the California Environmental Quality Act (CEQA), a significant impact is a project effect that may cause a substantial adverse change in the significance of a historical resource. Adverse changes include physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings resulting in the impairment of the resource's significance (Section 15064.5.4b, CEQA Guidelines). Mitigation measures are required for adverse effects on significant historical resources (Section 21083.2, CEQA Code).

State criteria are those listed in CEQA and used to determine whether a historic resource qualifies for the California Register of Historical Resources (CRHR). CEQA also recognizes resources listed in a local historic register or deemed significant in a historical resource survey. Some resources that do not meet these criteria may still be historically significant for the purposes of CEQA.

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

The City of San Diego 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 historic 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:

1. 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.
2. Is identified with persons or events significant in local, state, or national history.
3. 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.
4. Is representative of the notable work of a master builder, designer, architect, engineer, landscape architect, interior designer, artist, or craftsman.
5. 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.
6. 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 City of San Diego'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).

7.1.1 Management Plan for Otay Mesa Prehistoric Resources

The Management Plan for Otay Mesa Prehistoric Resources (Gallegos et al. 1998) was developed as an outgrowth of negotiations between Caltrans and the Office of Historic Preservation to provide consistent site definitions and a management strategy for the kinds of resources present on Otay Mesa. This plan begins with a discussion of recorded site types using information drawn from site record forms. Habitation sites, temporary camps, lithic scatters, quarry, shell middens, and non-sites are resource types defined for the baseline study area. The types of sites in the management planning area were stratified based on geologic and landform information.

After the initial discussion of recorded site types on the mesa, Gallegos et al. (1998) combined a few of the types and determined that three site types dominate Otay Mesa: habitation sites, artifact scatters/temporary camps, and lithic scatters.

Habitation site: Gallegos identified 14 loci from 9 sites as falling within this category. Sites were placed in this category if they had a subsurface artifact density of 100 artifacts per square meter or greater. Of the 14 identified habitation sites, 8 had been destroyed, 1 had been preserved, 4 were intact, and 1 was partially intact. Four of the habitation sites had features (Gallegos et al. 1998:3-29). Most of the sites had chert, obsidian, or chalcedony, most contained ground stone implements, and almost all had shell in sufficient quantity for conducting radiocarbon dating.

Temporary camp/artifact scatter: Gallegos documented 11 temporary camps/artifact scatters. This category was based on surface artifact density, and/or the presence of a substantial amount of faunal material combined with a lack of a subsurface component, (Gallegos et al. 1998:3-29). These sites represent short-term habitation periods, not of sufficient duration for a substantial midden to develop. Of the 11 sites in this category, 9 had been destroyed, 1 was intact, and 1 was partially intact. No features were found at any of the sites in this category.

Non-sites: Seventy-two sites on Otay Mesa fell into this category. Non-sites are defined by a lack of a substantial subsurface deposit and a surface artifact density of less than 0.03 artifacts per square meter (three lithic items within a 10x10-meter area). They noted that some 5,057,397 square meters of what they categorized as non-site had been recorded in their study area. These non-site or quasi-quarry areas contained some 5,824 artifacts of which some 68 percent or 3,947 were waste flakes. A total of 1,859 tools were also noted. The total artifact density was 0.0009 artifacts/square meter, or 1 artifact/3,000 meters (Gallegos et al. 1998:3-45). Gallegos felt that some of the sites in this category could be redefined as activity area or temporary camps with additional effort.

Gallegos et al. 1998 suggest that much of the effort to date on Otay Mesa has been wasted on these sparse lithic scatters, which have little or no research potential. This is made worse because they have been recorded and/or tested one small piece at a time as each parcel is developed. Research on these low-density lithic scatters wastes precious research resources and has yielded virtually no meaningful insights into prehistory. They assert that these low-density lithic scatters should be treated as archaeological noise and not recorded in future research because they get in the way of more productive research. Work in the future should be concentrated on the few habitation sites that remain, since they would provide information to answer research questions concerning settlement patterns, chronology, lithic technology, trade, and diet.

7.2 Evaluation of Resources

The current survey identified only two cores and less than ten flakes in the proposed project area of 23.9 acres. No two artifacts were within 30 meters of one another. Had the area not already been mapped as part of CA-SDI-12337, these artifacts would have been considered isolates and not potentially significant historical resources. Various portions of CA-SDI-12337 have been tested in the past for significance using City Guidelines, including Couples and Eidsness 1978, Gallegos et al. 1992, Kyle and Gallegos 1992a-1992e, Serr and Saunders 1994, and Kyle et al. 1996. In all cases, the portion of CA-SDI-12337 (or the portion originally called CA-SDI-5252) being tested was determined not to be a significant historical resource under City and CEQA Guidelines. Testing found low densities of surface and subsurface artifacts, lack of intact subsurface midden deposits or the presence of features, lack of surface or subsurface integrity, and a lack of data capable of addressing substantive research questions.

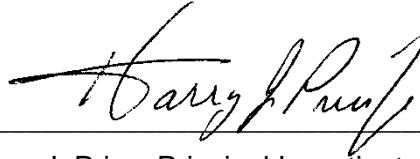
Using the Historical Resources Guidelines and mitigation measures described in the Otay Mesa Community Plan Update EIR, RECON has come to the following conclusions. Because of the small number of artifacts observed, lack of artifact concentrations, and the repeated testing of other portions of the site with determinations of not significant, RECON does not recommend a testing program for the portion of CA-SDI-12337 on the project property. All previous testing programs of other parts of CA-SDI-12337 have determined the site is not a significant historical resource. The lack of observed artifacts, lack of midden type soil, and the history of farming-related disturbance on the project portion of the site indicate that the results of any testing program would produce the same not significant results.

The Native American community has recommended that a Native American monitor be present for ground-disturbing activities on the project property. RECON recommends a qualified archaeological monitor be present for all ground-disturbing activities in case unexpected intact subsurface features are uncovered.

A Department of Parks and Recreation Continuation Sheet has been filled out detailing the results of the current survey and will be submitted to the SCIC (Confidential Attachment 2).

8.0 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 of San Diego. To the best of our knowledge, the statements and information contained in this report are accurate.



Harry J. Price, Principal Investigator

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	Field Archaeologist
Nathaniel Yerka	Field Archaeologist
Gabe Kitchen Jr.	Native American Monitor
Tushon Phoenix	Native American Monitor
Sean Bohac	GIS Analyst
Vince Martinez	Graphic Designer/Cartographer
Stacey Higgins	Senior Production Specialist

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City of San Diego

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Hector, Susan M., and Stephen R. Van Wormer

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- 1992b Archaeological Testing for a Portion of CA-SDI-5352 Located within the George Ellis Parcel, Otay Mesa, San Diego, California. Unpublished manuscript on file at the SCIC, San Diego State University, San Diego, CA.

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San Diego, City of

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ATTACHMENTS

ATTACHMENT 1

Native American Heritage Commission Response Letter

STATE OF CALIFORNIA

Ernesto G. Brown, Jr., Governor

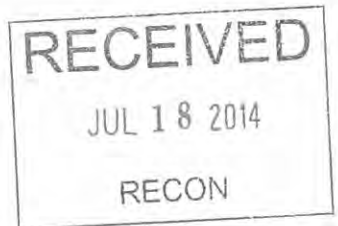
NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Boulevard, Suite 100
 West Sacramento, CA 95691
 (916) 373-3715
 Fax (916) 373-5471
 Web Site www.nahc.ca.gov
 E-mail Ds_nahc@pacbell.net



July 17, 2014

Ms. Carmen Zepeda-Herman, M.A., RPA
RECON Environmental, Inc.
 1927 Fifth Avenue
 San Diego, CA 92101



Sent by FAX to: 619-308-9333
 No. of Pages: 5

RE: Sacred Lands File Search and Native American Contacts list for the "**La Media, Otay Mesa Project, RECON #7105;**" located in the City of San Diego south of Otay Mesa Road; San Diego County, California

Dear Ms. Zepeda-Herman:

A record search of the NAHC Sacred Lands Inventory failed to indicate the presence of Native American traditional sites/places of the Project site(s) or 'areas of Potential effect' (APEs), submitted to this office. Note also that the absence of archaeological features, Native American cultural resources does not preclude their existence at the subsurface level.

In the 1985 Appellate Court decision (170 Cal App 3rd 604), the Court held that the NAHC has jurisdiction and special expertise, as a state agency, over affected Native American resources impacted by proposed projects, including archaeological places of religious significance to Native Americans, and to Native American burial sites.

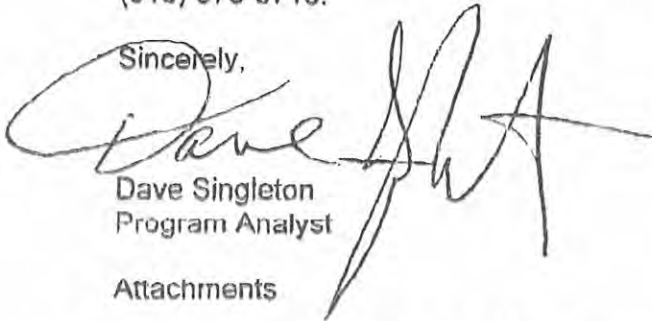
When the project becomes public, please inform the Native American contacts as to the nature of the project (e.g. residential, renewable energy, infrastructure or other appropriate type). Attached is a list of Native American tribes, Native American individuals or organizations that may have knowledge of cultural resources in or near the proposed project area (APE). As part of the consultation process, the NAHC recommends that local government and project developers contact the tribal governments and Native American individuals on the list in order to determine if the proposed action might impact any cultural places or sacred sites. If a response from those listed on the attachment is not received in two weeks of notification, the NAHC recommends that a follow-up telephone call be made to ensure the project information has been received.

California Government Code Sections 65040.12(e) defines 'environmental justice' to provide "fair treatment of people...with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations and policies." Also,

Executive Order B-10-11 requires that state agencies "consult with Native American tribes, their elected officials and other representatives of tribal governments in order to provide meaningful input into...the development of legislation, regulations, rules and policies on matter that may affect tribal communities."

If you have any questions or need additional information, please contact me at (916) 373-3715.

Sincerely,

A handwritten signature in black ink, appearing to read "Dave Singleton". The signature is stylized and overlaps the typed name below it.

Dave Singleton
Program Analyst

Attachments

PS: I will be leaving the NAHC July 25th after more than eight years working for cultural preservation and protection. I have enjoyed the collaboration with you in the interest of building community relationships with Native American tribes through the environmental planning process. My replacement is Gayle Totton (gayle.totton@nahc.ca.gov). Send her a note if you wish. Thanks for the past productive eight years plus. I can be reached at gdavidsingle@rocketmail.com. Dave Singleton

**Native American Contacts
San Diego County
July 17, 2014**

Barona Group of the Capitan Grande
Clifford LaChappa, Chairperson
1095 Barona Road Diegueno
Lakeside , CA 92040
sue@barona-nsn.gov
(619) 443-6612
(619) 443-0681

Sycuan Band of the Kumeyaay Nation
Daniel Tucker, Chairperson
5459 Sycuan Road Diegueno/Kumeyaay
El Cajon , CA 92019
ssilva@sycuan-nsn.gov
(619) 445-2613
(619) 445-1927 Fax

La Posta Band of Mission Indians
Gwendolyn Parada, Chairperson
8 Crestwood Road Diegueno/Kumeyaay
Boulevard , CA 91905
gparada@lapostacasino.
(619) 478-2113
(619) 478-2125

Viejas Band of Kumeyaay Indians
Anthony R. Pico, Chairperson
P.O. Box 908 Diegueno/Kumeyaay
Alpine , CA 91903
jhagen@viejas-nsn.gov
(619) 445-3810
(619) 445-5337 Fax

Manzanita Band of Kumeyaay Nation
Leroy J. Elliott, Chairperson
P.O. Box 1302 Diegueno/Kumeyaay
Boulevard , CA 91905
ljbirdsinger@aol.com
(619) 766-4930
(619) 766-4957 Fax

Kumeyaay Cultural Historic Committee
Ron Christman
56 Viejas Grade Road Diegueno/Kumeyaay
Alpine , CA 92001
(619) 445-0385

San Pasqual Band of Mission Indians
Allen E. Lawson, Chairperson
P.O. Box 365 Diegueno
Valley Center, CA 92082
allenl@sanpasqualband.com
(760) 749-3200
(760) 749-3876 Fax

Campo Band of Mission Indians
Ralph Goff, Chairperson
36190 Church Road, Suite 1 Diegueno/Kumeyaay
Campo , CA 91906
chairgoff@aol.com
(619) 478-9046
(619) 478-5818 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting locative Americans with regard to cultural resources for the proposed Light Industrial/Commercial Development on 54.1-acres in the City of San Diego in the Otay Mesa area: San Diego County, California for which a Sacred Lands file search and Native American Contacts list were requested.

**Native American Contacts
San Diego County
July 17, 2014**

Jamul Indian Village
Raymond Hunter, Chairperson
P.O. Box 612 Diegueno/Kumeyaay
Jamul, CA 91935
jamulrez@sctdv.net
(619) 669-4785

Viejas Band of Kumeyaay Indians
ATTN: Julie Hagen, Cultural Resources
P.O. Box 908 Diegueno/Kumeyaay
Alpine, CA 91903
jhagen@viejas-nsn.gov
(619) 445-3810
(619) 445-5337

Mesa Grande Band of Mission Indians
Mark Romero, Chairperson
P.O. Box 270 Diegueno
Santa Ysabel, CA 92070
mesagrandeband@msn.com
(760) 782-3819
(760) 782-9092 Fax

Ewiiapaayp Tribal Office
Will Micklin, Executive Director
4054 Willows Road Diegueno/Kumeyaay
Alpine, CA 91901
wmicklin@leaningrock.net
(619) 445-6315
(619) 445-9126 Fax

Kwaaymii Laguna Band of Mission Indians
Carmen Lucas
P.O. Box 775 Diegueno-Kwaaymii
Pine Valley, CA 91962
(619) 709-4207

Iipay Nation of Santa Ysabel
Clint Linton, Director of Cultural Resources
P.O. Box 507 Diegueno/Kumeyaay
Santa Ysabel, CA 92070
cjlinton73@aol.com
(760) 803-5694

Inaja Band of Mission Indians
Rebecca Osuna, Chairman
2005 S. Escondido Blvd. Diegueno
Escondido, CA 92025
(760) 737-7628
(760) 747-8568 Fax

Kumeyaay Diegueno Land Conservancy
Mr. Kim Bactad, Executive Director
2 Kwaaypaay Court Diegueno/Kumeyaay
El Cajon, CA 91919
kimbactad@gmail.com
(619) 659-1008 Office
(619) 445-0238 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting locative Americans with regard to cultural resources for the proposed Light Industrial/Commercial Development on 54.1-acres in the City of San Diego in the Otay Mesa area; San Diego County, California for which a Sacred Lands file search and Native American Contacts list were requested.

**Native American Contacts
San Diego County
July 17, 2014**

Inter-Tribal Cultural Resource Protection Council
Frank Brown, Coordinator
240 Brown Road Diegueno/Kumeyaay
Alpine, CA 91901
frbrown@viejas-nsn.gov
(619) 884-6437

Kumeyaay Cultural Repatriation Committee
Bernice Paipa, Vice Spokesperson
P.O. 937 Diegueno/Kumeyaay
Boulevard, CA 91905
bernicepaipa@gmail.com

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed Light Industrial/Commercial Development on 54.1-acres in the City of San Diego in the Otay Mesa area; San Diego County, California for which a Sacred Lands file search and Native American Contacts list were requested.

ATTACHMENT 2

Response Letters from Interested Groups

From: [Clint Linton](#)
To: [Stacey Higgins](#)
Cc: [Harry Price](#)
Subject: Re: Industrial Boulevard Development Project, Chula Vista (RECON Number 7105)
Date: Monday, July 28, 2014 2:58:45 PM

Hi Harry. Please have a kumeyaay NAM for survey and all ground disturbing phases of this project. Thank you, clint

Sent from my iPhone

On Jul 28, 2014, at 10:37 AM, Stacey Higgins <shiggins@reconenvironmental.com> wrote:

Per the request of Harry Price, attached is a PDF of the above-referenced letter requesting your feedback regarding the proposed project as it relates to Native American issues or interests. A hard copy also has been mailed to you. Please contact Harry with any comments or questions.

Stacey Higgins
Senior Production Specialist

RECON Environmental, Inc.

1927 Fifth Avenue
San Diego, CA 92101
P (619) 308-9333
F (619) 308-9334

An Employee-Owned Company

WARNING: The information provided via electronic media is not guaranteed or warranted against any defects, including design, calculation, completeness, data translation, or transmission errors or omissions.

[Linton.pdf](#)

<Linton.pdf>

VIEJAS

TRIBAL GOVERNMENT

RECEIVED

AUG 07 2014

RECON

P.O. Box 908
Alpine, CA 91903
#1 Viejas Grade Road
Alpine, CA 91901

Phone: 6194453810
Fax: 6194455337
viejas.com

August 4, 2014

Harry Price
1927 Fifthe Ave.
San Diego, Ca 92101

RE: La Media Otay Mesa Project # 7105

Dear Mr. Price

The Viejas Band of Kumeyaay Indians would like to request additional information on the archeological data of the project site on the above referenced project and/or site visit in order to make an informed decision/recommendation on the matter.

Sincerely,

VIEJAS BAND OF KUMEYAAY INDIANS

CONFIDENTIAL ATTACHMENTS

Are not for public review



An Employee-Owned Company

April 29, 2020

Mr. Theodore R. L. Shaw
Senior Land Use Consultant
Atlantis Group
2488 Historic Decatur Road, Suite 200
San Diego, CA 92106

Reference: Addendum to the Results of Historical Resources Survey of the La Media Retail Project, San Diego, California (RECON Number 7105)

Dear Mr. Shaw:

RECON Environmental, Inc. (RECON) has prepared this addendum evaluating potential historical resources associated with the Industrial Alternative to the La Media Retail Project (project). This alternative would develop the project site with two industrial buildings totaling approximately 257,158 square feet. Impacts associated with the Commercial/Retail Alternative were evaluated in the *Results of Historical Resources Survey of the La Media Retail Project* (RECON 2017).

PROJECT DESCRIPTION – LA MEDIA INDUSTRIAL NORTH PROJECT ALTERNATIVE

The 17.6-acre project site is located in the city of San Diego, south of Otay Mesa Road, north of State Route 905 (SR-905), and east of the La Media Road (Figure 1). The off-site improvement area, consisting of an additional 6.3 acres, is located on the western, northern, and eastern edges of the project site. The project site is found in the northwest $\frac{1}{4}$ of the northwest $\frac{1}{4}$ of Section 35, Township 18 South, Range 1 West, of the U.S. Geological Survey (USGS) 7.5-minute topographic map, Otay Mesa quadrangle (Figure 2; USGS 1994). Figure 3 shows the project on the City of San Diego 800-scale maps, and Figure 4 shows the project location on an aerial photograph.

The project site and most of the off-site improvement area is currently undeveloped. A portion of the off-site area is developed as part of La Media Road. Commercial/industrial land uses occur to the north, west, and southeast of the project site, while vacant lands occur to the south and east. Brown Field Municipal Airport is to the northwest of the project site, and SR-905 is located approximately 0.5 mile to the east. Both the project site and the adjacent vacant lands have been extensively tilled for agriculture, although the majority of the land is currently fallow.

The Industrial Alternative proposes to construct two industrial buildings totaling approximately 257,158 square feet on the 17.6-acre project site. Building 1 would total 113,928 square feet and would be located on the western portion of the project site. Building 2 would total 143,240 square feet and would be located on the eastern portion of the project site. A total of 285 parking spaces would be provided on the site. The Industrial Alternative also includes the same off-site improvements located on the western and northern boundaries for frontage and roadway improvements as addressed for the Commercial/Retail Alternative. However, the off-site improvement area to the east of the project site has been entitled under the Sunroad Project, and mitigation for potential impacts to this area have accounted for under that project. Therefore, this addendum does not evaluate impacts to the off-site improvement areas east of the project site.

PROJECT IMPACTS – INDUSTRIAL ALTERNATIVE

The on-site impact footprint for the Industrial Alternative would be identical to the impact footprint of the Commercial/Retail Alternative evaluated in the existing Results of Historical Resources Survey Report.

While the Industrial Alternative includes the same off-site improvements located on the western and northern boundaries as the commercial/retail project, the off-site improvement area to the east of the project site has been excluded. The 50-acre site immediately adjacent to the eastern boundary of the project site has been entitled for development. This entitlement has been secured by the project applicant proposing the Industrial Alternative evaluated in this addendum. Therefore, the Industrial Alternative would not result in impacts to, or be responsible for, mitigation for the off-site improvement area east of the project site. It is anticipated that the Industrial Alternative project would be built as a follow up phase to the as a follow up phase to the project on the 50-acre site which would be built first.

Since the Industrial Alternative has reduced the project footprint, and the Results of Historical Resources Survey Report evaluated development of the entire area that would be impacted under the Industrial Alternative, potential impacts to historic resources associated with the Industrial Alternative would be the same those that would occur under the Commercial/Retail Alternative. As described in the *Results of Historical Resources Survey of the La Media Retail Project*, a field survey and a record search with a one-mile radius was conducted. The records search identified a single large site (CA-SDI-12337) covering the entire project site. No previously unrecorded prehistoric historical resources were found during the survey, and limited evidence of CA-SDI-12337 was observed during the survey. Various portions of CA-SDI-12337 have been tested in the past for significance and were all determined not to be a significant historical resource. Based on the Historical Resources Guidelines and mitigation measures presented in the Otay Mesa Community Plan Update (OMCPU) Final Program Environmental Impact Report (PEIR), it was determined that due to the small number of artifacts observed, the lack of artifact concentrations, and the repeated testing of other portions of the site with determinations of not significant, a testing program for the portion of CA-SDI-12337 on the project site is not recommended. However, excavation during construction would have the potential to unearth unknown or previously undisturbed archaeological resources, which would be considered a significant impact. Therefore, monitoring for cultural resources by a City-approved qualified archaeologist during ground-disturbing activities would be required, consistent with the OMCPU Final PEIR Mitigation Framework (Mitigation HIST-1). Implementation of mitigation measure MM-HR-1 as stated in Section VII, the Mitigation Monitoring and Reporting Program would reduce impacts related to archaeological resources to a level less than significant. There are no historic buildings, structures, and objects on the project site. No known burial sites or cemeteries exist within the project site, and it is not expected that human remains would be discovered during construction. In the unlikely event of the discovery of human remains during project grading, work shall halt in that area and the procedures set forth in the California Public Resources Code (Section 5097.98) and state Health and Safety Code (Section 7050.5) shall be undertaken. Therefore, the Industrial Alternative would not result in any new significant solid waste impacts that were not identified in the *Results of Historical Resources Survey Report of the La Media Retail Project*.

Sincerely,



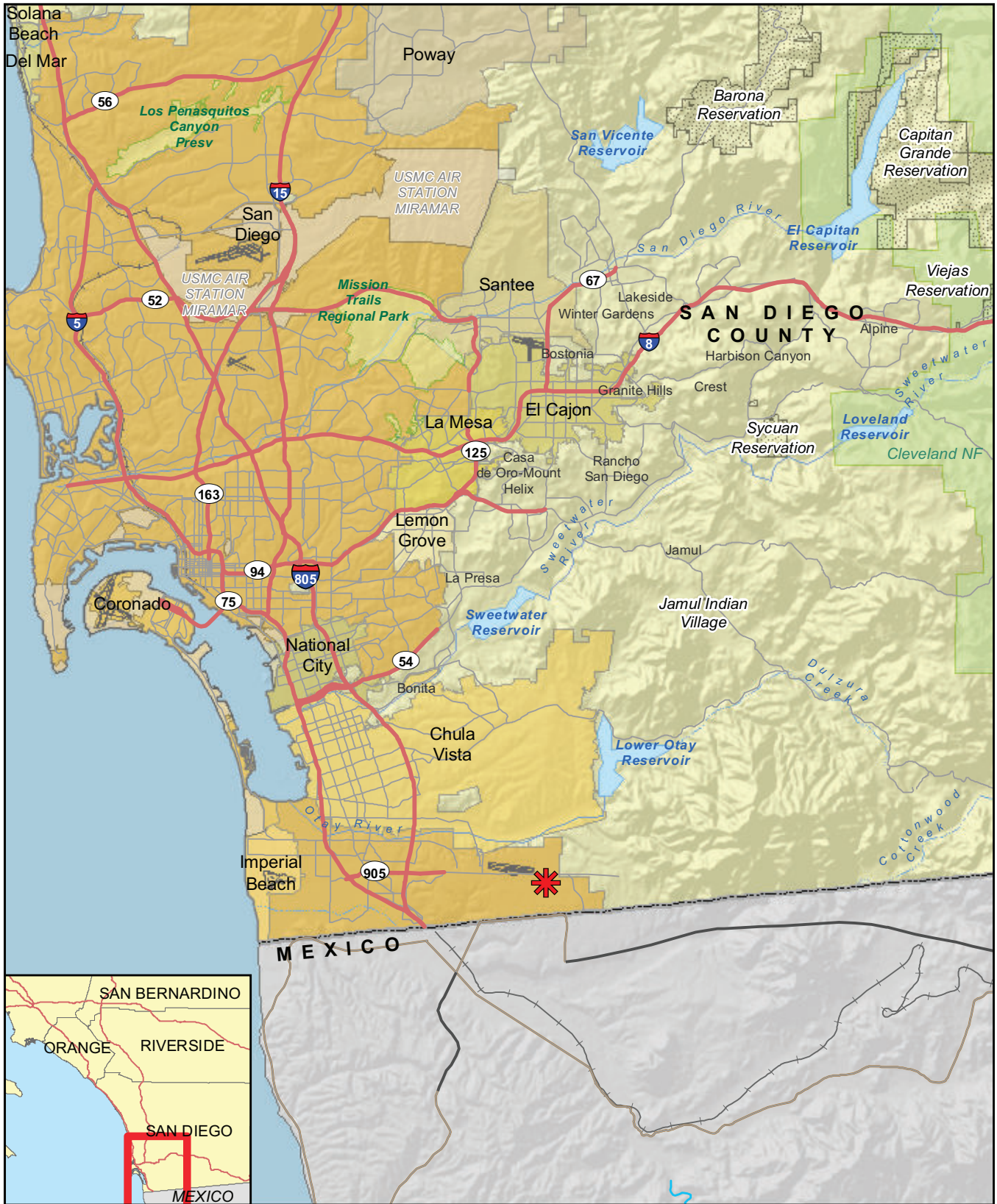
Carmen Zepeda-Herman
Archaeology Project Director

CZH:jg

REFERENCES CITED

RECON Environmental, Inc. (RECON)

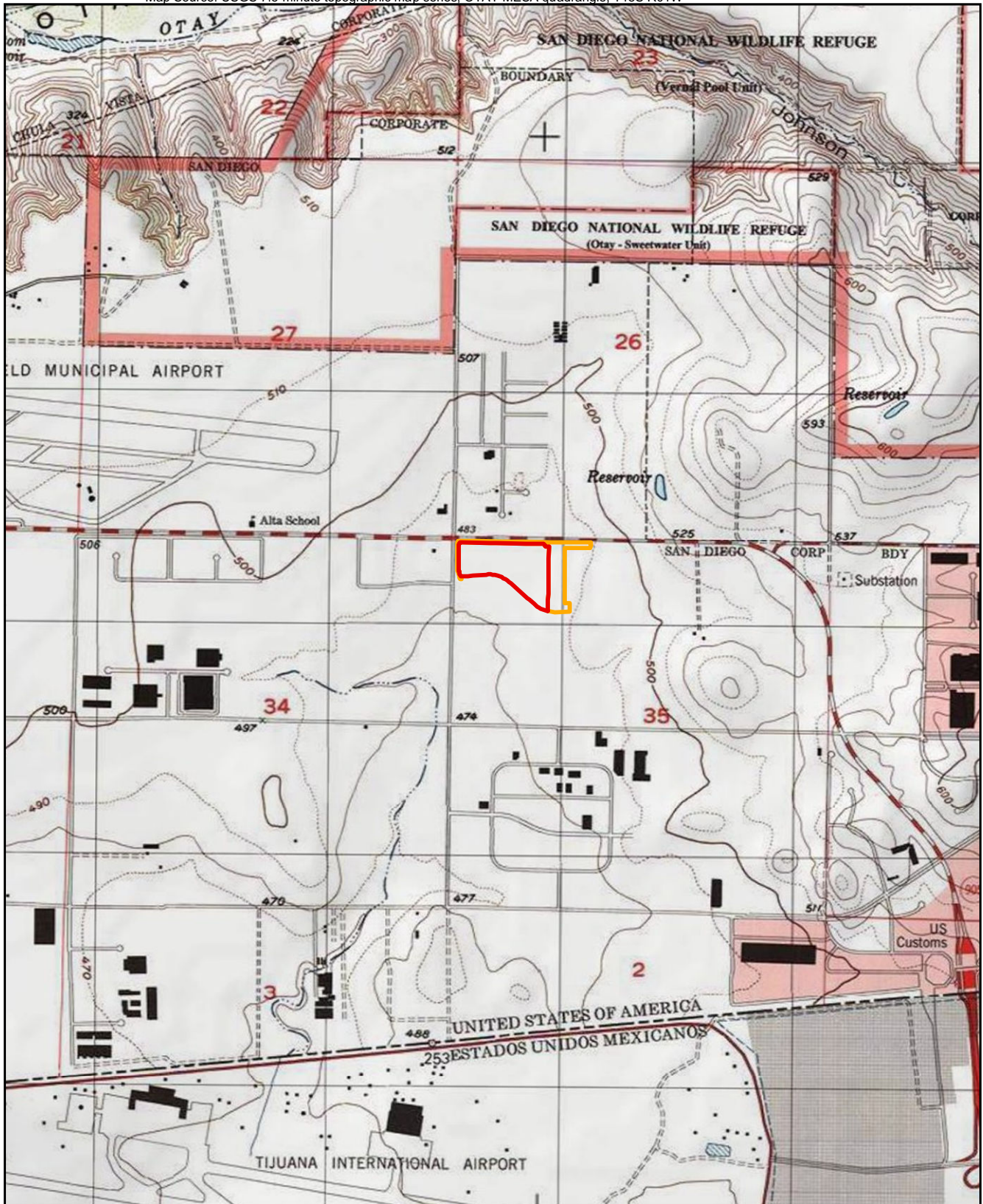
2017 Results of Historical Resources Survey Report of the La Media Retail Project, San Diego, California.





 Project Location

FIGURE 1

Regional Location



-  Project Boundary
-  Off-site Survey Area

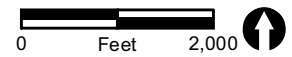
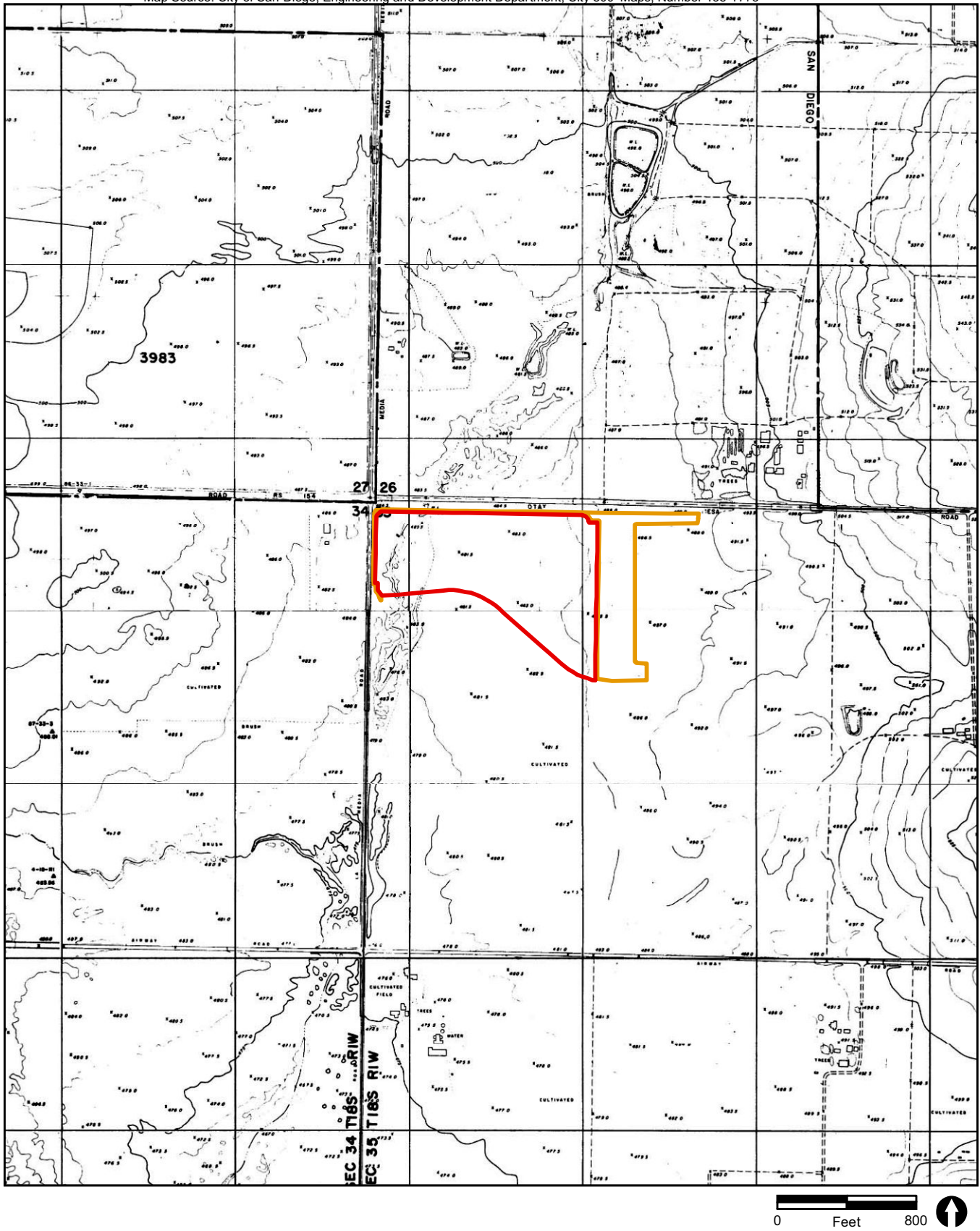


FIGURE 2

Project Location on USGS Map







-  Project Boundary
-  Off-site Survey Area

FIGURE 3

Project Location on City 800' Map



-  Project Boundary
-  Off-site Survey Area

0 Feet 200 

FIGURE 4

Project Location on Aerial Photograph