

Appendix B

Archaeological Survey Report

September 2024

DRAFT

**ARCHAEOLOGICAL SURVEY FOR THE JACUMBA FIRE
STATION #43 SURVEY PROJECT IN JACUMBA HOT
SPRINGS, SAN DIEGO COUNTY, CALIFORNIA
Project Number 20200156.25**

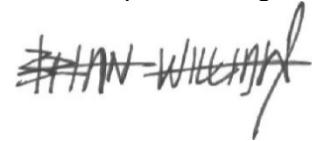
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NATIONAL ARCHAEOLOGICAL DATABASE INFORMATION

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Report Date: September 2024

Report Title: Archaeological Survey for the Jacumba Fire Station #43 Survey Project
in Jacumba Hot Springs, San Diego County, California

Type of Study: Pedestrian Survey

Newly Recorded Sites: None

Sites with Updated Records: CA-SDI-8072

USGS Quads: Jacumba OE S 7.5-minute USGS Quadrangle

Acreage: 2.77 Acres

Keywords: CA-SDI-8072; Jacumba Valley Archaeological District; Jacumba Fire
Station#43; Old Highway 80

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LIST OF ACRONYMS AND ABBREVIATIONS

| | |
|------|---|
| APN | Assessor Parcel Number |
| ASM | ASM Affiliates, Inc. |
| B.P. | Before the present |
| CCR | California Code of Regulations |
| CEQA | California Environmental Quality Act |
| cm | centimeter |
| CRHR | California Register of Historical Resources |
| DGS | Department of General Services |
| DPR | California Department of Parks and Recreation |
| GIS | Geographic Information System |
| GNSS | Global Navigation Satellite System |
| IDAD | In-Ko-Pah Discontiguous Archaeological District |
| JDAD | Jacumba Discontiguous Archaeological District |
| JVAR | Jacumba Valley Archaeological District |
| m | meter |
| MLD | Most Likely Descendant |
| NADB | National Archaeological Database |
| NAHC | Native American Heritage Commission |
| NRHP | National Register of Historic Places |
| PDS | Planning & Development Services |
| PRC | Public Resources Code |
| RPO | County of San Diego Resource Protection Ordinance |
| SCIC | South Coastal Information Center |
| SLF | Sacred Lands File |
| USDA | U.S. Department of Agriculture |
| USGS | U.S. Geological Survey |

EXECUTIVE SUMMARY

ASM Affiliates, Inc. (ASM) was contracted to conduct a pedestrian survey for the Jacumba Fire Station #43 Survey Project (Project), given its location within the Jacumba Valley Archaeological District (JVAD). The investigation included a cultural resource records search at the South Coastal Information Center of the California Historical Resources Information System at San Diego State University, a search of the Sacred Lands Files at the Native American Heritage Commission, along with an archaeological survey and review of previous testing of the site.

This study was completed to satisfy requirements of the California Environmental Quality Act (CEQA), which requires evaluation of the historical significance of cultural resources and the significance of potential adverse effects on lands planned for development. ASM also prepared this report in compliance with *County of San Diego Guidelines for Determining Significance* (County of San Diego 2007a), *Report Format and Content Guidelines* (County of San Diego 2007b), Resource Protection Ordinance (RPO), Section 21083.2 of the Public Resources Code, and the San Diego County CEQA Guidelines. The results of this archaeological inventory will assist the County in determining the direct impacts to resources and with the creation of a preservation plan or mitigation for any significant resources.

The project proposes to build a new fire station with an approximately 2.77-acre footprint on a 5-acre property in the southwest corner of Assessor Parcel Number (APN) 660-150-18-00, north of Old Highway 80, directly east of Jacumba Hot Springs, and approximately 900 meters northwest of the Jacumba Airport.

The record search revealed 67 previously recorded cultural resources within a 1-mile radius of the project area; this includes 53 archaeological sites and 14 isolates. The JVAD, including site CA-SDI-8072, directly intersect with the proposed project area. On March 13, 2024, the project area was surveyed by ASM, including site CA-SDI-8072, within the project area. No artifacts were identified during the survey. Further research revealed that SDI-8072 was tested for significance under CEQA and County RPO and for eligibility to the California Register of Historical Resources (CRHR) by Dudek in 2018-2019 for the JVR Energy Park Project. This study completed a full surface collection and subsurface testing on SDI-8072, including within the current project area. This study excavated five shovel test pits (STPs), one Surface Scrap Unit (SSU), six auger units, and a surface collection of artifacts across SDI-8072. Dudek found that the site had a low potential for significant buried deposits or culturally sensitive materials and recommended that SDI-8072 was not significant under CEQA, not eligible for listing in the CRHR or Local Register, not a significant resource under County RPO, and not considered a contributor to the significance of the JVAD. Based on the current survey ASM agrees with this evaluation. As such, ASM recommends that the Project will not result in a substantial adverse change in the significance of a historical resource in accordance with CEQA Guidelines Section 15064.5(b).

ASM obtained a negative result to the Sacred Lands File check performed by the Native American Heritage Commission (NAHC). The NAHC provided a list of 20 Tribal contacts which may have additional information on the project area. ASM sent information request letters to the 20 Tribal contacts on March 14, 2024. To date, only two responses to ASM's letters have been received. As of August 2024, government to government AB-52 consultation was still in process. AB-52 consultation letters were mailed on April 18, 2024, with a requested response date of May 24, 2024. Two tribes responded requesting consultation under AB 52, including the Campo Kumeyaay Nation and Manzanita Band of the Kumeyaay Nation. Once complete, a summary of the consultation will be included in the Final MND.

Given the presence of the JVAD and CA-SDI-8072 within the project area and the poor ground surface visibility within the project area, monitoring of the initial ground disturbance by an archaeologist and Native

American monitor is recommended to mitigate for potential impacts to cultural resources due to inadvertent discoveries.

All field notes and photographs from ASM's survey are on file at ASM's office in San Diego, California. California Department of Parks and Recreation (DPR) forms for each resource documented are provided as an appendix to this report and will be submitted to the SCIC of the California Historical Resources Information System (CHRIS) at San Diego State University (SDSU).

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1.0 INTRODUCTION

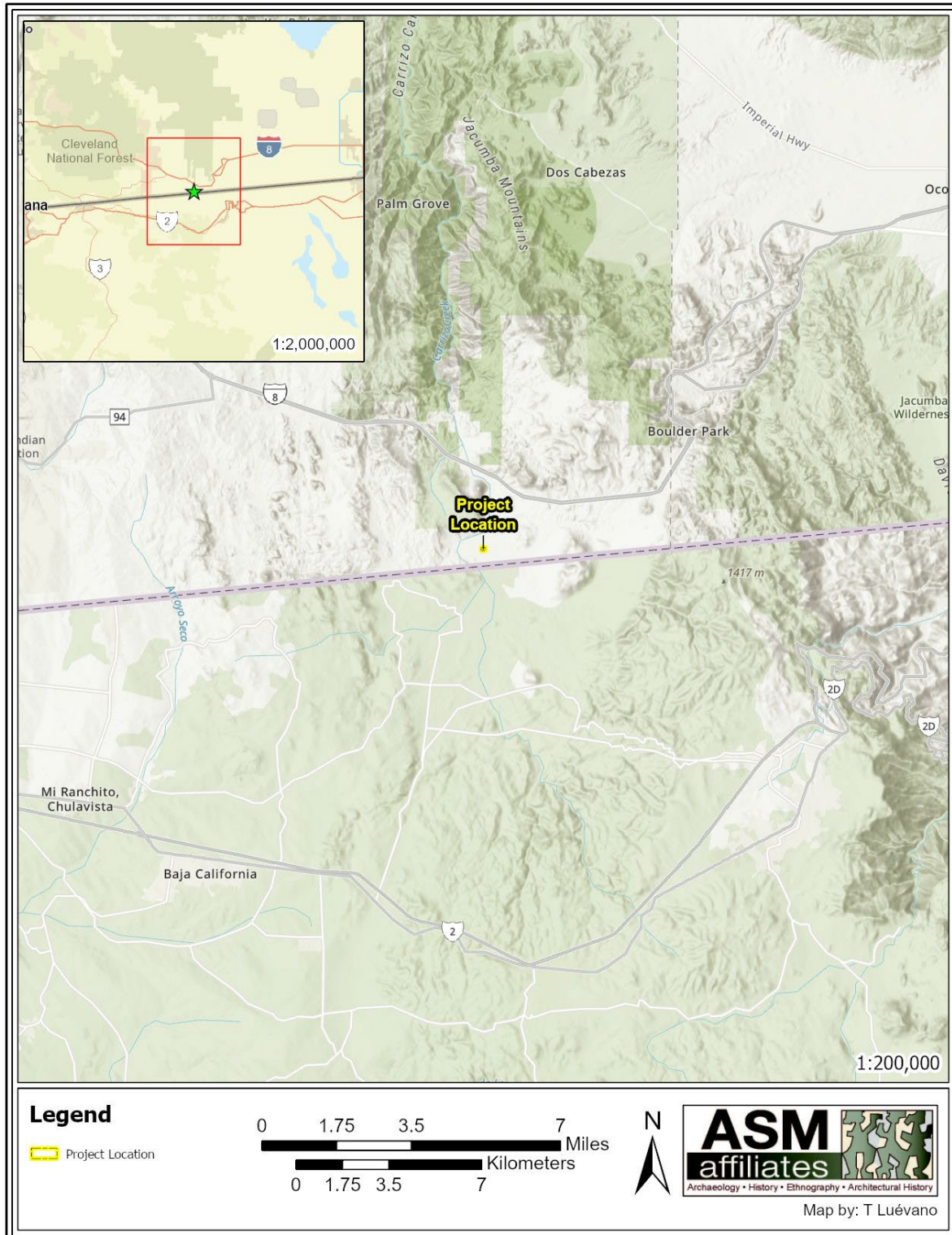
ASM Affiliates (ASM) was contracted to conduct a pedestrian survey for the Jacumba Fire Station #43 Survey Project (Project), given its location within the Jacumba Valley Archaeological District (JVAD). The investigation included a cultural resource records search at the South Coastal Information Center of the California Historical Resources Information System at San Diego State University and a search of the Sacred Lands Files at the Native American Heritage Commission, along with an archaeological survey and testing of the site. The study was conducted to provide compliance with the County of San Diego Guidelines, the County Resource Protection Ordinance (RPO), and the California Environmental Quality Act (CEQA). The report was compiled in accordance with the *County of San Diego Guidelines for Determining Significance* (County of San Diego 2007a) and *Report Format and Content Guidelines* (County of San Diego 2007b), the RPO, Public Resources Code Section 21083.2 (CEQA), and the County of San Diego CEQA Guidelines. This report addresses the direct impacts to resources and makes an assessment of impact severity as outlined in Section 4.2 of the County Guidelines.

1.1 PROJECT LOCATION AND DESCRIPTION

The project location is shown on the Jacumba OE S, California, 7.5' USGS topographic quadrangle in Township 18 South and Range 8 East, Section 9 (Map 1.1). The proposed project area is north of Old Highway 80, directly east of Jacumba Hot Springs, and approximately 900 meters northwest of the Jacumba Airport (Map 1.2).

The purpose of the project is to develop a new fire station to replace the existing Jacumba Station #43, including three-apparatus bay and six-dorm room double bunk facility, parking, septic system, leach field, storm water management, and well. This is to be developed on 2.77 acres of land within a 5-acre property in the southwest corner of APN 660-150-18-00.

1. Introduction

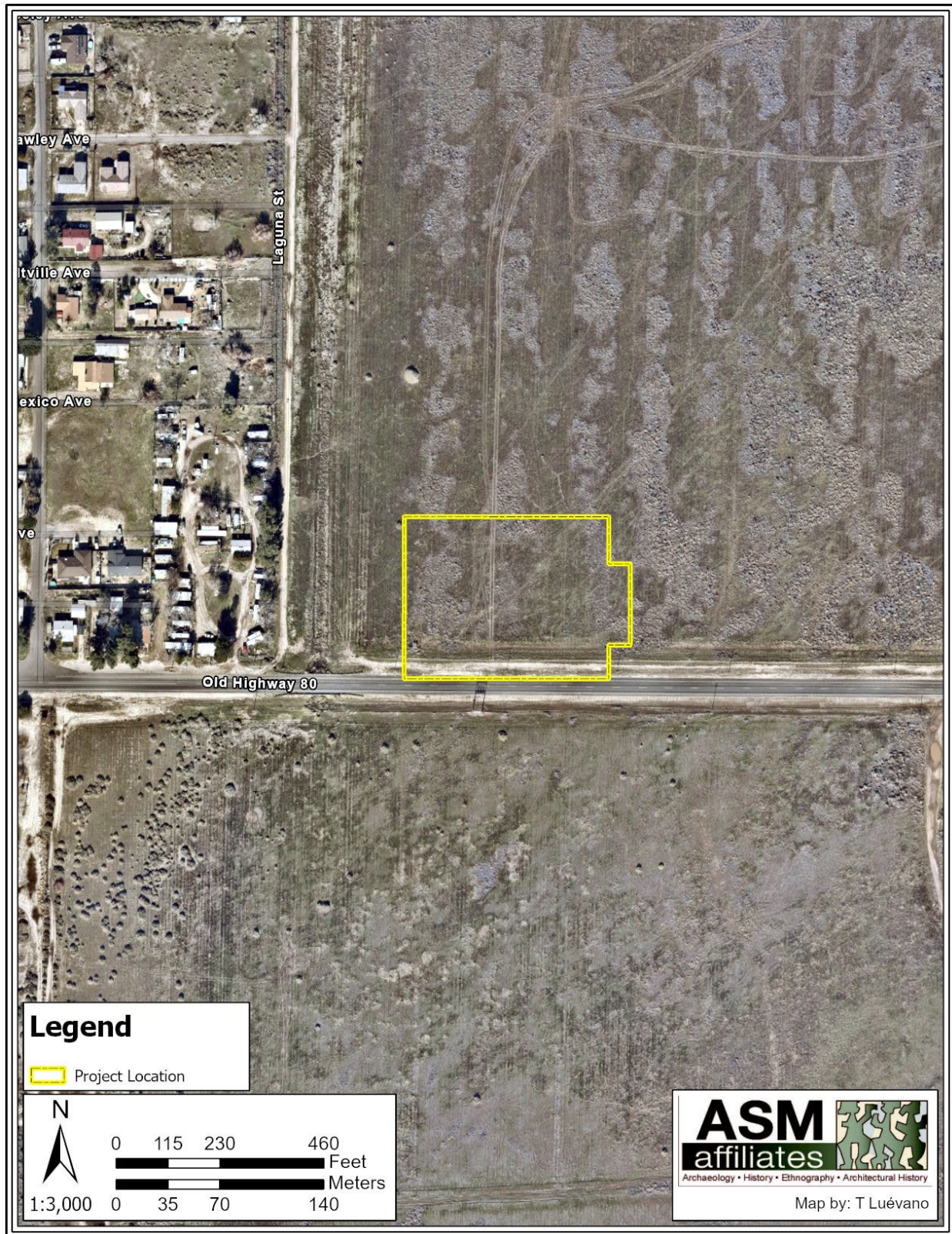


Map 1.1 Vicinity Map.



Map 1.2 Location Map on USGS Jacumba OE S 7.5' Topographic Quadrangle .

1. Introduction



Map 1.3 Project aerial showing project location north of Old Highway 80.

1.2 EXISTING CONDITIONS

This section reviews the environmental setting of the survey area, along with prehistoric, ethnographic, and historic contexts. Previous archaeological research conducted in the area is also reviewed. The discussion that follows is a summary describing how pertinent investigations in the general region have contributed to the current understanding of cultural history. It is not intended to be an exhaustive account of all research conducted in the area.

1.2.1 Environmental Setting

Natural Setting

The following is summarized from a geological study of the Jacumba region (Minch and Abbott 1973). The geologic characteristics of Jacumba Valley were formed by alternating volcanic and fluvial activity. The base upon which all other deposits rest is the Peninsular Range Batholith, which dates to approximately 100 million years ago. The gravels of the Table Mountain formation lie atop the eroded batholith formations. The Table Mountain gravels consist of sandstones with clasts up to 30 cm in diameter. Over 50 percent of the clasts are extra-regional, low grade, green metavolcanics and metasedimentary rocks; the remainders are local quartzite, sandstone, granitic, and gneissic rocks.

Some 18.5 million years ago, during the Miocene Epoch, the Jacumba Volcanics formed. Outpourings of basalt flows were followed by faulting and deposition of andesitic pyroclastic and flow deposits. Round Mountain and Jade Peak, both plug-like masses, may be the sources of the andesitic deposits. After a break, basalt flows reoccurred, covering the andesitic deposits in the northeast and eastern portions of the valley. Subsequent post-volcanic faulting elevated the Peninsular Range, accelerating the erosion that produced the present-day topography of Jacumba Valley. The clasts that formed during the Mesozoic and the andesitic deposits of Miocene age provide the stone used predominately by the prehistoric human occupants in the area to produce flaked and ground stone tools.

Jacumba is at the crest of the Peninsular Range. Water is seasonally available with constant seismic activity creating and closing springs throughout the area. The National Center for Environmental Information indicates mean winter lows of 1° C and mean summer highs of 33° C (National Weather Service 2022). Precipitation in the region is insignificant, with only 45 cm of rain falling annually in sporadic winter rains and in a few summer thunderstorms. The largest drainages, Carrizo, Boundary, and Boulder creeks, provide only intermittent runoff from the Peninsular Range.

Typical natural vegetation in the vicinity of the data recovery sites is a desert transition community, which joins agave-ocotillo and pinyon-juniper habitats. Plant varieties include: Desert agave (*Agave deserti*), Mohave yucca (*Yucca schidigera*), desert apricot (*Prunus fremontii*), juniper (*Juniperus californica*), cholla (*Opuntia* spp.), buckwheat (*Eriogonum fasciculatum*), creosote (*Larrea divaricata*), catclaw (*Acacia greggii*), ephedra (*Ephedra aspera*, *E. californica*, *E. trifurca*), and jojoba (*Simmondsia chinensis*).

Fauna common to the desert transition zone also represent a mixing of the desert floor and mountain varieties. Mammals include but are not limited to: bighorn sheep (*Ovis canadensis*), black-tailed jackrabbit (*Lepus californicus*), cottontail rabbit (*Sylvilagus audubonii*), California ground squirrel (*Otospermophilus beecheyi*), antelope ground squirrel (*Ammospermophilus leucurus*), pocket gopher (*Thomomys bottae*), little pocket mouse (*Perognathis longimembris*), short-eared pocket mouse (*Perognathis fallax*), kangaroo rat (*Dipodomys agilis*), deer mouse (*Peromyscus maniculatus*), brush mouse (*Peromyscus boylii*), desert pack rat (*Neotoma lepida*), coyote (*Canis latrans*), gray fox (*Urocyon cinereoargenteus*), ringtail (*Bassariscus astutus*), badger (*Taxidea taxus*), mountain lion (*Felis concolor*), bobcat (*Lynx rufus*), and

mule deer (*Odocoileus hemionus*) (Ryan 1968). Reptiles like the western diamondback (*Crotalus atrox*), rosy boa (*Lichanura trivirgata*), flat-tail horned lizard (*Phrynosoma mcallii*), and other snakes and various lizards are common in the habitat.

Cultural Setting

Archaeological investigations in southern California have documented a diverse range of human adaptations extending from the late Pleistocene up to the time of European contact (e.g., Erlandson and Colten 1991; Erlandson and Glassow 1997; Erlandson and Jones 2002; Jones and Klar 2007; Moratto 1984). To describe and discuss this diversity, local investigators have proposed a variety of different chronologies and conceptual categories (periods, horizons, stages, phases, traditions, cultures, peoples, industries, complexes, and patterns), often with confusingly overlapping or vague terminology.

The prehistory of San Diego County is most frequently divided chronologically into three or four major periods. An Early Man stage, perhaps dating back tens of thousands of years, has been proposed. More generally accepted divisions include a Terminal Pleistocene/Early Holocene period (ca. 12,000–6000 B.C.) (Paleo-Indian stage; Clovis and San Dieguito patterns), a Middle/Late Holocene period (ca. 6000 B.C.–A.D. 800) (Archaic stage; La Jolla, Millingstone, or Encinitas pattern), and a Late Prehistoric period (ca. A.D. 800–1769) (Archaic stage; Yuman, Cuyamaca, Patayan, or Hakataya pattern).

Hypothetical Early Man (pre-ca. 12,000 B.C.)

The antiquity of human occupation in the New World has been the subject of considerable interest and debate for more than a century. At present, the most widely accepted model is that humans first entered portions of the Western Hemisphere lying to the south of Alaska between about 15,000 and 12,000 B.C., either along the Pacific coastline or through an ice-free corridor between the retreating Cordilleran and Laurentide segments of the continental glacier in Canada, or along both routes. While there is no generally accepted evidence of human occupation in coastal southern California prior to about 11,000 B.C., ages estimated at 48,000 years and even earlier sometimes have been reported (e.g., Bada et al. 1974; Carter 1980). However, despite intense interest and the long history of research, no widely accepted evidence of human occupation of North America dating prior to about 14,000 B.C. has emerged.

Local claims for Early Man discoveries have generally been based either on the apparent crudeness of the lithic assemblages that were encountered or on the finds' apparent Pleistocene geological contexts (Carter 1957, 1980; Minshall 1976, 1989; Reeves et al. 1986). The amino acid racemization technique was used in the 1970s and early 1980s to assign Pleistocene ages to several coastal San Diego sites (Bada et al. 1974), but the technique's findings have been discredited by more recent accelerator mass spectrometry radiocarbon dating (Taylor et al. 1985).

Terminal Pleistocene/Early Holocene Period (ca. 12,000-6000 B.C.)

The earliest chronologically distinctive archaeological pattern recognized in most of North America is the Clovis pattern. Dated to around 11,500 B.C., Clovis assemblages are distinguished by fluted projectile points and other large bifaces, as well as extinct large mammal remains. At least three isolated fluted points have been reported within San Diego County, but their occurrence is very sparse, and their dating and contexts are uncertain (Davis and Shutler 1969; Kline and Kline 2007; Rondeau et al. 2007).

The most widely recognized archaeological pattern within this period is termed San Dieguito and has been dated from at least as early as 8500 B.C. to perhaps around 6000 B.C. (Rogers 1966; Warren 1966; Warren et al. 2008). Proposed characteristics to distinguish San Dieguito flaked lithic assemblages include large projectile points (Lake Mojave, Silver Lake, and other, less diagnostic forms), bifaces, crescents, scraper planes, scrapers, hammers, and choppers. The San Dieguito technology involved well-controlled percussion flaking and some pressure flaking.

Malcolm Rogers (1966) suggested that three successive phases of the San Dieguito pattern (San Dieguito I, II, and III) could be distinguished in southern California, based on evolving aspects of lithic technology. However, subsequent investigators have generally not been able to confirm such changes, and the phases are not now generally accepted.

A key issue has concerned ground stone, which was originally suggested as having been absent from San Dieguito components but has subsequently been recognized as occurring infrequently within them. It was initially suggested that San Dieguito components, like other Paleo-Indian manifestations, represented the products of highly mobile groups that were organized as small bands and focused on the hunting of large game. However, in the absence of supporting faunal evidence, this interpretation has increasingly been called into question, and it has been suggested that the San Dieguito pattern represented a more generalized, Archaic-stage lifeway, rather than a true Paleo-Indian adaptation.

A vigorous debate has continued for several decades concerning the relationship between the San Dieguito pattern and the La Jolla pattern that succeeded it and that may have been contemporaneous with or even antecedent to it (e.g., Gallegos 1987; Warren et al. 2008). The initial view was that San Dieguito and La Jolla represented the products of distinct ethnic groups and/or cultural traditions (e.g., Rogers 1945; Warren 1967, 1968). However, as early Holocene radiocarbon dates have been obtained for site components with apparent La Jolla characteristics (shell middens, milling tools, and simple cobble-based flaked lithic technology), an alternative interpretation has gained some favor: that the San Dieguito pattern represented a functional pose related in particular to the production of bifaces, and that it represents activities by the same people who were responsible for the La Jolla pattern (e.g., Bull 1987; Hanna 1983).

Middle/Late Holocene Period (ca. 6000 B.C.-A.D. 800)

Archaeological evidence from this period, derived primarily from the coastal region, has been characterized as belonging to the Archaic stage, Millingstone horizon, Encinitas tradition, or La Jolla pattern (Moratto 1984; Rogers 1945; Wallace 1955; Warren 1968; Warren et al. 2008). Adaptations during this period apparently emphasized gathering, in particular the harvesting of shellfish and hard plant seeds, rather than hunting. Distinctive characteristics of the La Jolla pattern include extensive shell middens, portable ground stone metates and manos, crudely flaked cobble tools, occasional large expanding-stemmed projectile points (Pinto and Elko forms) and flexed human burials. Inland variants are less clearly understood (Warren et al. 1961).

Investigators have called attention to the apparent stability and conservatism of the La Jolla pattern throughout this long period, as contrasted with less conservative patterns observed elsewhere in coastal southern California (Hale 2009; Sutton 2010; Sutton and Gardner 2010; Warren 1968). However, distinct chronological phases within the pattern have also been suggested, based on changes in the flaked lithic and ground stone technologies, the shellfish species targeted, and burial practices (Harding 1951; Moriarty 1966; Rogers 1945; Shumway et al. 1961; Sutton and Gardner 2010; Warren 1964; Warren et al. 2008).

Late Prehistoric Period (ca. A.D. 800-1769)

A Late Prehistoric period in San Diego County has been distinguished, primarily on the basis of three major innovations: the use of small projectile points (Desert Side-notched, Cottonwood triangular, and Dos Cabezas forms), associated with the adoption of the bow and arrow in place of the atlatl as a primary hunting tool and weapon; brownware pottery, presumably supplementing the continued use of basketry and other containers; and the practice of human cremation in place of inhumation. Uncertainty remains concerning the exact timing of these innovations, and whether they appeared simultaneously or sequentially (e.g., Griset 1996; Laylander 2011; Yohe 1992).

Labels applied to the archaeological manifestations of this period include Yuman, Cuyamaca, Patayan, and Hakataya (Rogers 1945; True 1970; Schroeder 1978; Waters 1982). These remains have generally been associated with the ethnohistorically known Kumeyaay (Diegueño, Tipai, Ipai) and have been seen as perhaps marking the initial local appearance of that group in a migration from the lower Colorado River region. Traits characterizing the Late Prehistoric period include a shift toward greater use of inland rather than coastal settlement locations, greater reliance on acorns as an abundant but labor-expensive food resource, a greater emphasis on hunting of both large and small game (particularly deer and rabbits), a greater amount of interregional exchange (seen notably in more use of obsidian), more elaboration of nonutilitarian culture (manifested in more frequent use of shell beads, decorated pottery, and the distinctive Rancho Bernardo and La Rumorosa rock art styles), and possibly denser regional populations (Christenson 1990; McDonald and Eighmey 2008). Whether settlement became sedentary during this period, as compared with the preceding period, is uncertain.

Ethnohistoric Period

In ethnohistoric times, central and southern San Diego County was occupied by speakers of a Yuman language or languages, variously referred to as Kumeyaay, Diegueño, Tipai, and Ipai. Kumeyaay territory extended from south of Agua Hedionda Lagoon, Escondido, and Lake Henshaw to some distance south of Ensenada in northern Baja California, and east nearly as far as the lower Colorado River. Linguistic evidence (e.g., Golla 2007; Laylander 2010) suggests that the Yuman-Cochimí families of languages may have been affiliated with a widespread Hokan phylum, represented by scattered languages and families around the periphery of California and extending south into Mexico, and probably dating back at least as far as the early Holocene. Subsequent separations within the Yuman-Cochimí group may represent territorial expansions or migrations: the separation of Yuman and central Baja California's Cochimí (ca. 2000 B.C.?); the differentiation of Core Yuman from Kiliwa (ca. 1000 B.C.?); of Core Yuman into Delta-California, River, and Pai branches (ca. A.D. 1?); of Delta-California Yuman into Diegueño and Cocopah (ca. A.D. 500?); and of Diegueño into Kumeyaay proper, Ipai, Tipai, and Ku'ahl languages or dialects (ca. post-A.D. 1000?). The boundary between Ipai and Kumeyaay proper (or Tipai) languages or dialects on the San Diego coast has generally been put just south of the San Diego River (Luomala 1978).

While Kumeyaay cultural patterns, as recorded subsequent to European contact, cannot necessarily be equated with Late Prehistoric patterns, at a minimum they provide indispensable clues to cultural elements that would be difficult or impossible to extract unaided from the archaeological record alone. A few important ethnohistoric accounts are available from Hispanic-period explorers and travelers, Spanish administrators, and Franciscan missionaries, primarily in coastal areas (Fages 1937; Geiger and Meighan 1976; Laylander 2000). Many accounts by ethnographers, primarily recorded during the early twentieth century, are available (Almstedt 1982; Drucker 1937, 1941; Gifford 1918, 1931; Hicks 1963; Hohenthal 2001; Kroeber 1925; Laylander 2004; Luomala 1978; Shipek 1982, 1991; Spier 1923; Waterman 1910).

The Kumeyaay inhabited a diverse environment that included littoral, valley, foothill, mountain, and desert resource zones. Because of the early incorporation of coastal Kumeyaay into the mission system, most of the available ethnographic information relates to inland groups that lived in the Peninsular Range or the Colorado Desert. There may have been considerable variability among the Kumeyaay in settlement and subsistence strategies and in social organization (Laylander 1991, 1997; Luomala 1978; Spier 1923; but cf. Shipek 1982). Acorns were a key resource, but a wide range of other mineral, plant, and animal resources were exploited (Hedges 1986; Shipek 1991; Wilken 2012). Precontact practices of land management and agriculture west of the Colorado Desert have been suggested but not confirmed (Shipek 1993; cf. Laylander 1995). Some degree of residential mobility seems to have been practiced, although its extent and nature (e.g., within patterns of community fission and fusion) may have varied considerably among different communities and settings. The fundamental Kumeyaay social unit above the family was the *šimul* (patrilineage) and the residential community or band, to the extent that those two units were not identical. Leaders performed ceremonial, advisory, and diplomatic functions, rather than judicial, redistributive, or

military ones. There seems to have been no national level of political unity and perhaps little sense of commonality within the language group (but cf. Shipek 1982).

Kumeyaay material culture was effective, but it was not highly elaborated. Structures included houses with excavated floors, ramadas, sweathouses, ceremonial enclosures, and acorn granaries. Hunting equipment included bows and arrows, curved throwing sticks, nets, and snares. Processing and storage equipment included a variety of flaked stone tools, milling implements, ceramic vessels, and baskets.

Nonutilitarian culture was not neglected. A range of community ceremonies was performed, with particular emphases placed on marking individuals' coming of age and on death and mourning. Oral literature included, in particular, an elaborate creation myth that was shared with other Yuman groups as well as with Takic speakers (Luiseño, Cupéño, Cahuilla, and Serrano) to the north (Kroeber 1925; Laylander 2001; Waterman 1909).

Historic Period

European exploration of the San Diego area began in 1542 with the arrival of a maritime expedition under Juan Rodriguez Cabrillo, followed by a similar reconnaissance in 1602 by Sebastián Vizcaíno (Pourade 1960). It is possible that additional brief, unrecorded contacts with the crews of the Manila galleons may have occurred during the following century and a half, and that other influences, such as an awareness of alien technologies or the introduction of diseases, may have reached the region overland from earlier outposts of the Spanish empire in Baja California or Sonora.

The historic period proper did not begin until 1769, when multiple seaborne and overland expeditions under the leadership of the soldier Gaspar de Portolá and the Franciscan missionary Junípero Serra reached the region from Baja California and passed northward along the coastal plain to seek Monterey. In that year, a royal presidio and the Misión San Diego de Alcalá were founded, and the incorporation of local Kumeyaay into the mission system was begun. Shortly after the mission had been moved a short distance to the east from the presidio, a Kumeyaay uprising in 1775 resulted in the burning of the mission and the killing of one of its Franciscan missionaries (Carrico 1997). However, the uprising was soon suppressed. An *asistencia* or satellite mission was established at Santa Ysabel in 1818.

As Spanish attention was consumed by the Napoleonic wars in Europe, California and its government and missions were increasingly left to their own devices. In 1821, Mexico gained its independence from Spain, and the region became more open to outside visitors and influences (Pourade 1961). The loyalty to Mexico of the European Franciscans was considered to be in doubt, and private secular interests clamored for a greater share of the region's resources. The missions were secularized by act of the Mexican Congress in 1833. Native Americans released from the San Diego mission returned to their native villages, moved east to areas lying beyond Mexican control, or sought work on ranchos or in the town of San Diego. Numerous large land grants were issued to private owners during the Mexican period, including Janal, Jamacha, Jamul, El Cajon, Cañada de San Vicente, San Bernardo, Santa María, Cuyamaca, Santa Ysabel, and San Felipe in inland southern and central San Diego County (Pourade 1963).

The conquest and annexation of California by the United States in the Mexican-American War between 1846 and 1848 ushered in many more changes (Pourade 1963, 1964, 1965, 1967, 1977; Pryde 2004). Faced with debts and difficulties in confirming land grants, many Californio families lost their lands to outsiders. Cultural patterns that were brought by immigrants from the eastern U.S. gradually supplanted old Californio customs. Native American reservations were established at Mesa Grando, Santa Ysabel, Inaja, Cosmit, Barona, Capitan Grande, Viejas, Cuyapaipe, Sycuan, Manzanita, La Posta, and Campo (Shipek 1978).

The region experienced cycles of economic and demographic booms and busts, with notable periods of growth in the mid-1880s, during World Wars I and II, and on a more sustained basis throughout the postwar

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decades. Aspects of development included the creation of transportation networks based on port facilities, railroads, highways, and airports; more elaborate systems of water supply and flood control; grazing livestock and growing a changing array of crops; supporting military facilities; limited amounts of manufacturing; and accommodating visitors and retirees. After false starts, San Diego converted itself to a substantial city, and then into a metropolis. Other cities were incorporated in the inland southern and central region of San Diego County, including El Cajon (1912), La Mesa (1912), Lemon Grove (1977), Santee (1980), and Poway (1980). Notable unincorporated communities include Spring Valley, Lakeside, Alpine, and Ramona (Pryde 2004).

1.2.2 Record Search Results

In order to ascertain the proximity of existing cultural resources to the proposed project area, a record search was undertaken by the SCIC (see Appendix A). The search encompassed a 1-mi. radius around the proposed project area. In addition to the records search at the SCIC, an examination of historic maps and aerials was also conducted via a historic maps and aerials repository. This record search was completed to determine the general character of the cultural resources within the area as well as to gauge the potential effects of proposed construction activities.

Previous Studies

A total of 21 previous reports have addressed areas within a 1-mi. radius of the Project area (Table 1.1), with three of the studies intersecting the proposed project area.

Table 1.1 Previous Cultural Resources Reports Addressing the Project Area
(Intersecting Reports in **Bold**)

| Report Number | Authors/Publisher | Date | Title | Distance to Project Area (mi.) |
|-----------------|---------------------------------------|-------------|--|--------------------------------|
| SD-00479 | Paul G. Chace & Associates | 1980 | A Cultural Resources Assessment of Jacumba, San Diego County. | 0 |
| SD-01267 | San Diego State University | 1976 | An Archaeological Inventory and Assessment of Corridor Segments 46 and 49, Preferred Southern Route, San Diego County. | 0.03 |
| SD-01588 | Wirth Associates, Inc. | 1981 | Miguel to Mountain Springs Grade (Jade) Archaeological Survey Report | 0.43 |
| SD-01633 | Wirth Associates, Inc. | 1987 | Archaeological Investigations at SDI-4470 | 0.29 |
| SD-03014 | Cultural Resource Management | 1995 | Cultural Resource Survey Report Form for The Richard Cox Property, Jacumba, California | 0.79 |
| SD-03836 | Wirth Environmental Services | 1984 | Southwest Powerlink Cultural Resources Management Plan | 0.68 |
| SD-04401 | Wirth Associates, Inc. | 1987 | Jacumba Archaeological District (same report as WIRTH 30 and WIRTH 33) | 0.45 |
| SD-05214 | Welch, Patrick | 1982 | Cultural Resource Report: Lark Canyon Motorcycle Trails & Trail Location | 0.20 |
| SD-05490 | Brian Mooney and Associates | 1991 | Appendix F Cultural Resources Draft Environmental Impact Report for Jacumba Valley Ranch Specific Plan Volume I | 0 |
| SD-05510 | California Desert District | n.d. | Jacumba Discontiguous Archaeological District | 0.43 |
| SD-06188 | County of San Diego Public Works | 1988 | Archaeological Investigations at Jacumba Park, San Diego County, California | 0.12 |
| SD-07618 | Wirth Associates, Inc. | 1981 | Jacumba Archaeology District (same report as WIRTH 13 and WIRTH 33) | 0.46 |
| SD-08282 | Lortie Frank | 2001 | Historic Property Survey Report for Old Highway 80, San Diego County, CA | 0.43 |
| SD-08602 | Wirth Associates, Inc. | 1981 | Jacumba Archaeological District | 0.45 |

| Report Number | Authors/Publisher | Date | Title | Distance to Project Area (mi.) |
|-----------------|--------------------------------|-------------|--|--------------------------------|
| SD-10551 | SWCA Environmental Consultants | 2006 | Cultural Resources Final Report of Monitoring and Findings for the QWEST Network Construction Project, State of California | 0.69 |
| SD-12421 | ASM Affiliates, Inc. | 2000 | Final: A Cultural Resources Inventory of the Proposed AT&T / PF. Net Fiber Optics Conduit Ocotillo to San Diego, California | 0 |
| SD-12711 | ASM Affiliates, Inc. | 2010 | Final Inventory Report of the Cultural Resources Within the Approved San Diego Gas & Electric Sunrise Powerlink Final Environmentally Superior Southern Route, San Diego and Imperial Counties, California | 0.59 |
| SD-13910 | EDAW, Inc. | 2010 | Final Archaeological and Historical Investigations for the Energia Sierra Juarez U.S. Gen-Tie Line Project Jacumba, California | 0.61 |
| SD-14602 | Tierra Environmental Services | 2003 | Archaeological Survey Report for the Jacumba Water System Rehabilitation Project, San Diego County, California | 0.21 |
| SD-16541 | ASM Affiliates, Inc. | 2011 | Draft Impacts Assessment for the SDG&E East County Substation Project, San Diego County, California | 0.51 |
| SD-16849 | HDR | 2010 | Final Report Prehistoric Artifact Scatters, Bedrock Milling Stations and Tin Can Dumps: Results of a Cultural Resources Study For The SDG&E East County Substation Project San Diego County, California | 0.54 |

Previously Recorded Sites within the Study Area

The results of the records search at the SCIC revealed that a total of 67 previously recorded cultural resources are within a 1-mi. radius of the current project area (Confidential Map 1.4 – Appendix C). The northern portion of site CA-SDI-8072 is within the project area. The Project area is also located within the Jacumba Discontiguous Archaeological District and the Jacumba Valley Archaeological District (JVAD)

Table 1.2 Previous Recorded Cultural Resources within a 1-mi. Radius of the Project Area (Intersecting Resources in **Bold**)

| Designation | | Site Type | Recorder, Date | Distance to Project Area (mi.) |
|----------------|---------------|---|--|--------------------------------|
| Primary Number | Trinomial | | | |
| P-37 | CA-SDI | | | |
| 004455 | 004455 | Prehistoric village of Hakum, with bedrock milling, lithics, fire affected rock, ceramics, and bone | Tift, et al. (2013); McGinnis (2003); Mooney Associates (1991); Joyner and Beck (1990); Wilcox and von Werlhof (1987); Chace (1980); Waldron (1976); Townsend (1976); Rogers (1920s) | 0.35 |
| 004457 | 004457 | AP2: Lithic Scatter; AP3: Ceramic Scatter; AP12: Quarry | Noah (1987); Waldron (1976) | 0.23 |
| 004459 | 004459 | AP2: Lithic Scatter; AP3 Ceramic Scatter; AP4 Bedrock Milling Feature | Hardaheer (1976) | 0.33 |
| 004476 | 004476 | Unknown age, AH2: Foundations/structure pads | Ritter (1976) | 0.80 |

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| Designation | | Site Type | Recorder, Date | Distance to Project Area (mi.) |
|----------------|---------------|--|--|--------------------------------|
| Primary Number | Trinomial | | | |
| P-37 | CA-SDI | | | |
| 006741 | 006741 | AP2: Lithic Scatter; AP3: Ceramic Scatter; AP9: Burials | Mooney (1990); Townsend (1976) | 0.40 |
| 007015 | 007015 | AH7: Railroad Grade | Gunderman (2010); Burkenroad (1979) | 0.31 |
| 007030 | 007030 | AP2: Lithic Scatter; AP3: Ceramic Scatter; AP4: Bedrock milling feature; AP8: Rock features; AP12: Quarry; AH4: Historic privies/ dumps/ trash scatter | Williams, et al. (2011); Whitaker (2009); Williams (2009); Donovan (1981); Dominici (1979) | 0.46 |
| 007031 | 007031 | AP2: Lithic Scatter | Dominici (1979) | 0.75 |
| 007032 | 007032 | AP2: Lithic Scatter | Crotteau (1979) | 0.73 |
| 007033 | 007033 | AH4: Historic privies/ dumps/ trash scatter | Burkenroad (1979) | 0.60 |
| 007034 | 007034 | AP2: Lithic Scatter; AP3: Ceramic Scatter | Burkenroad (1979) | 0.56 |
| 007035 | 007035 | AP2: Lithic Scatter | Burkenroad (1979) | 0.47 |
| 007036 | 007036 | AP2: Lithic Scatter | Burkenroad (1979) | 0.50 |
| 007037 | 007037 | AP2: Lithic Scatter | Whitaker (2009); Moore (1979) | 0.46 |
| 007038 | 007038 | Unknown age, AH2: Foundations/ structure pads | Dominici (1979) | 0.65 |
| 007056 | 007056 | AP2: Lithic Scatter | Whitaker (2009); Unspecified Author (1990); Crotteau (1979) | 0.72 |
| 008066 | 008066 | AP2: Lithic Scatter; AP3: Ceramic Scatter; AP4: Bedrock milling features; AP14: Rock shelter/ cave | Chace (1980) | 0.76 |
| 008067 | 008067 | AP2: Lithic Scatter; AP3: Ceramic Scatter; AP3: Bedrock milling feature | Wade (2009); Chace (1980) | 0.74 |
| 008068 | 006080 | AP2: Lithic Scatter | Thesken (1978); Unknown Author (Unspecified Pre-1978 date) | 0.79 |
| 008069 | 008069 | AP2: Lithic Scatter | Chace (1980) | 0.68 |
| 008070 | 008070 | AP2: Lithic Scatter | Donovan (1981); Chace (1980) | 0.66 |
| 008071 | 008071 | AP2: Lithic Scatter | Chace (1980) | 0.55 |
| 008072 | 008072 | AP2: Lithic Scatter | Palette and Andrews (2000); Unspecified Author (1990); Chace (1980) | 0 |
| 008430 | 008430 | AP2: Lithic Scatter; AH4: Historic privies/ dumps/ trash scatters | Daniels and Williams (2011); Unspecified Author (1990); van Horn and White (1988); Goldberg (1980) | 0.63 |
| 009926 | 009926 | AP2: Lithic Scatter; AP3: Ceramic Scatter | Williams (2009); Fink (1980) | 0.72 |
| 011688 | 011688 | AP2: Lithic Scatter; AP3: Ceramic Scatter | Serr (1990) | 0.78 |
| 011689 | 011689 | AP2: Lithic Scatter; AP3: Ceramic Scatter; AP9: Burial; AP16: Other (Shell Beads) | Serr and Cook (1990) | 0.21 |
| 011690 | 011690 | AP2: Lithic Scatter; AP4: Bedrock milling feature | Cook and Serr (1990) | 0.43 |
| 011691 | 011691 | AP2: Lithic Scatter | Cook and Serr (1990) | 0.69 |
| 011692 | 011692 | AP4: Bedrock milling feature | Williams (2009); Cook and Serr (1990) | 0.77 |
| 011712 | 011712 | HP5: Historic Hotel/ Motel | McGinnis (2003); Crull and Smith (1990) | 0.41 |

| Designation | | Site Type | Recorder, Date | Distance to Project Area (mi.) |
|----------------|-----------|---|---|--------------------------------|
| Primary Number | Trinomial | | | |
| P-37 | CA-SDI | | | |
| 013990 | 013948 | AH4: Historic Privies/ dumps/ trash scatters | Wade et al. (1995) | 0.82 |
| 013991 | 013949 | AP2: Lithic Scatter; AP3: Ceramic Scatter | Wade et al. (1995) | 0.80 |
| 014004 | 013962 | AP2: Lithic Scatter; AP4: Bedrock milling feature | Wade et al. (1995) | 0.81 |
| 024023 | - | HP37: Historic Highway/ trail | Rochester (2021); Giacinto and Wolf (2012); Willis (2010); Lortie (2000) | 0.30 |
| 024942 | 016509 | AP2: Lithic Scatter; AP3: Ceramic Scatter | McGinnis (2003) | 0.22 |
| 024943 | | AP2: Lithic Scatter; HP6: 1-3 story commercial building (foundation) | McGinnis (2003) | 0.52 |
| 024944 | 016510 | AP2: Lithic Scatter | McGinnis and Kochert (2003) | 0.28 |
| 024945 | - | HP2: single family property | McGinnis and Kochert (2003) | 0.70 |
| 025185 | 016682 | AP2: Lithic Scatter; AP3: Ceramic Scatter; AP4: Bedrock milling feature; AP15: Prehistoric Habitation Debris; AH4: Privies/ dumps/ trash scatters | McGinnis (2003) | 0.60 |
| 025680 | - | HP11 Engineering structure; AH7: Railroad bed | Connolly (2018); Comeau (2013); Giacinto and Wolf (2012); Williams (2009); Ghabhlain and Stringer-Bowsher (2009); Palette (2006); Iversen (2005); Wee and Ferrell (2000); | 0.31 |
| 027684 | 017979 | AP2: Lithic Scatter; AP3: Ceramic Scatter | Cooley (2006) | 0.24 |
| 030190 | - | AP16: Other (Isolate) | Whitaker (2008) | 0.80 |
| 030191 | - | AP16: Other (Isolate) | Whitaker (2008) | 0.76 |
| 030345 | - | AP16: Other (Isolate) | Williams (2008) | 0.73 |
| 030346 | - | AP16: Other (Isolate) | Williams (2008) | 0.81 |
| 030370 | 019303 | AP2: Lithic Scatter; AP4: Bedrock milling feature | Comeau (2009); Piek (2008) | 0.73 |
| 030502 | 019377 | AP2: Lithic Scatter; AP3: Ceramic Scatter | Price and Zepeda- Herman (2009) | 0.81 |
| 031350 | 019913 | AP2: Lithic Scatter | Comeau et al. (2009) | 0.72 |
| 034155 | 021365 | AP2: Lithic Scatter; AP3: Ceramic Scatter; AH4: Trash Scatter; AH5: Well/Cistern | Hennessey et al. (2013) | 0.33 |
| 034156 | 021366 | AP2: Lithic Scatter | Hennessey et al. (2013) | 0.61 |
| 034157 | 021367 | AP2: Lithic Scatter | Hennessey et al. (2013) | 0.64 |
| 038606 | 022725 | AP2: Lithic Scatter; AH: Privies/ dumps/ trash scatters | DeCarlo (2018) | 0.55 |
| 038607 | 022726 | AP2: Lithic Scatter; AP3: Ceramic Scatter | Colston (2019) | 0.26 |
| 038608 | 022727 | AP2: Lithic Scatter; AP3: Ceramic Scatter | DeCarlo (2019) | 0.19 |
| 038619 | - | AP16: Other (Isolate) | Colston (2019) | 0.32 |
| 038626 | - | AP16: Other (Isolate) | DeCarlo (2019) | 0.026 |
| 038627 | - | AP16: Other (Isolate) | DeCarlo (2018) | 0.22 |
| 038628 | - | AP16: Other (Isolate) | DeCarlo (2018) | 0.12 |
| 038629 | - | AP16: Other (Isolate) | DeCarlo (2018) | 0.30 |
| 038630 | - | AP16: Other (Isolate) | DeCarlo (2018) | 0.43 |

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| Designation | | Site Type | Recorder, Date | Distance to Project Area (mi.) |
|----------------|-----------|---|---------------------------|--------------------------------|
| Primary Number | Trinomial | | | |
| P-37 | CA-SDI | | | |
| 038631 | - | AP16: Other (Isolate) | DeCarlo (2018) | 0.64 |
| 038632 | - | AP16: Other (Isolate) | DeCarlo (2018) | 0.69 |
| 038633 | - | AP16: Other (Isolate) | DeCarlo (2018) | 0.29 |
| 038635 | 022729 | AP2: Lithic Scatter; AP3: Ceramic Scatter | Hadel (2018) | 0.57 |
| 038938 | - | HP2: Single Family Property; HP22: Lake/river/reservoir; HP33: Farm/ranch | Dotter and Colston (2018) | 0.49 |
| 039341 | - | AP16: Isolate | Billstrand (2020) | 0.42 |

CA-SDI-8072

Site CA-SDI-8072 was originally recorded by Paul G. Chace in 1980 as a 2,200-by-350 foot highly diffuse scatter of camp debris including Tizon and Buff ware ceramic sherds, a mano, a milling basin fragment, a scraper plane, hammerstones, cores, and basalt flakes across the ground surface. The site was noted as being damaged by agricultural activities, along with the development of Highway 80 across the site.

In November of 2000, D. Palette and S. Andrews of ASM Affiliates updated the site record after testing a portion of the site as part of proposed fiber optics route survey. The ASM testing between October and November 2000 (six STPs on each side of Highway 80 within the right-of way) showed considerable disturbance from road development, along with a lack of cultural resources.

While not yet within the SCIC records, Dudek conducted an archaeological study of SDI-8072 from 2018–2019 for the JVR Energy Park Project (DeCarlo, Colston, and Hale 2020) (Appendix C). This study completed a full surface collection and subsurface testing on SDI-8072, including within the current project area. During the study, Dudek expanded the boundaries of SDI-8072 to 675 by 270 meters. The surface inventory identified 314 artifacts across the entire project area consisting of 169 flaked stone artifacts, 129 ceramics, 12 groundstone, and four percussing tools. The artifacts were widely dispersed, likely from extensive agricultural activity; however, one concentration of artifacts, CON-1A, outside of the current project area, was identified in the southern portion of the site.

The Dudek study excavated five shovel test pits (STPs), one Surface Scrape Unit (SSU), six auger units and a surface collection of artifacts. STPs-01, -03, and -04 were negative. STP-02 produced one ceramic fragment at a depth of 20–40 cm and STP-5 yielded one ceramic sherd from level 0–20 cm. All STPs exhibited moist, moderately compacted, well sorted, dark brown silty clay loam. The SSU was excavated to 10 cm, but artifacts were observed only in the upper 5 cm. No cultural materials were observed in the auger test units.

Dudek found that the site had a low potential for significant buried deposits or culturally sensitive materials and recommended that SDI-8072 was not significant under CEQA, not eligible for listing in the CRHR or Local Register, and not considered a contributor to the significance of the JVAD.

Proposed/Existing Districts for the Jacumba Valley Area

Jacumba Discontiguous Archaeological District (JDAD)

During the survey for and evaluation of the SWPL project in 1982, Wirth Associates, Inc. designated the Jacumba Discontiguous Archaeological District (JDAD). The BLM subsequently determined the district NRHP eligible under criterion D.

The district covers 441 acres and includes 70 sites and 22 isolates, which primarily consist of a lithic quarrying and tool manufacturing area, with associated habitation zones (BLM 1982). Most sites ($n = 40$) are lithic scatters and quarrying areas. Thirteen temporary camps (short-term habitation) were also included as well as three base camps (long-term habitation). The district was divided into four areas (A through D) based on the limits of the cultural properties, the unity of the cultural properties, and/or the natural features of the landscape. The JDAD was thought to be a significant example of a multiple-resource area that contributed to the understanding of Late Prehistoric resource exploitation (Townsend 1984).

Jacumba Valley Archaeological District (JVAD)

In 2013, ASM incorporated the district into the Jacumba Valley Archaeological District, under NHRP criteria A and D. The nomination introduced site CA-SDI-8072 to the JVAD as an artifact scatter of fair integrity and eligible under NHRP criteria A and D.

During the Sunrise Powerlink Transmission Line Project in 2013, ASM nominated the Jacumba Valley Archaeological District (JVAD) as eligible for the NHRP under NHRP criteria A for its contribution to at least two themes related to the broad patterns of our history: 1) development of a Traditional Cultural Landscape in Jacumba Valley and 2) Sacred and Traditional Importance of Story, Ceremony, and Ritual to the Kumeyaay. For Criterion D, the information content of the prehistoric archaeological sites in Jacumba Valley site has yielded and will continue to yield regionally important information for archaeological and anthropological research. The newly nominated district covers 4,222 acres of the northern portion of the desert valley environment, incorporating the Jacumba Discontiguous Archaeological District (JDAD). The Jacumba Valley is recognized archaeologically as an interface for exchange between the Pacific Coast and the Colorado River, particularly with sites dating to Late Prehistoric and early Historic periods.

The district includes 144 prehistoric sites, nine isolated artifacts, and 11 possible traditional cultural properties. These sites are associated with habitation areas and villages, ceremonial sites, artifact scatters, and earth oven features, in addition to ethnographically significant sites.

1.3 APPLICABLE REGULATIONS

Resource importance is assigned to districts, sites, buildings, structures, and objects that possess exceptional value or quality illustrating or interpreting the heritage of San Diego County in history, architecture, archaeology, engineering, and culture. Several criteria are used in demonstrating resource importance. Specifically, criteria outlined in CEQA and the San Diego County Local Register provide the guidance for making such a determination. The County of San Diego Resource Protection Ordinance (RPO) does not apply to this project. The following section(s) details the criteria that a resource must meet to be determined important.

1.3.1 California Environmental Quality Act (CEQA)

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

- (1) A resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code SS5024.1, Title 14 CCR. Section 4850 et seq.).
- (2) A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements of section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- (3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code SS5024.1, Title 14, Section 4852) including the following:
 - (A) Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
 - (B) Is associated with the lives of persons important in our past;
 - (C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
 - (D) Has yielded, or may be likely to yield, information important in prehistory or history.
- (4) The fact that a resource is not listed in, or determined eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resource Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code section 5020.1(j) or 5024.1.

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

- (1) Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.
- (2) The significance of an historical resource is materially impaired when a project:
 - (A) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or

- (B) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- (C) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

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

- (1) When a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource, as defined in subsection (a).
- (2) If a lead agency determines that the archaeological site is an historical resource, it shall refer to the provisions of Section 21084.1 of the Public Resources Code, and this section, Section 15126.4 of the Guidelines, and the limits contained in Section 21083.2 of the Public Resources Code do not apply.
- (3) If an archaeological site does not meet the criteria defined in subsection (a), but does meet the definition of a unique archaeological resource in Section 21083.2 of the Public Resources Code, the site shall be treated in accordance with the provisions of section 21083.2. The time and cost limitations described in Public Resources Code Section 21083.2 (c-f) do not apply to surveys and site evaluation activities intended to determine whether the project location contains unique archaeological resources.
- (4) If an archaeological resource is neither a unique archaeological nor an historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment. It shall be sufficient that both the resource and the effect on it are noted in the Initial Study or EIR, if one is prepared to address impacts on other resources, but they need not be considered further in the CEQA process.

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

- (d) When an initial study identifies the existence of, or the probable likelihood, of Native American human remains within the project, a lead agency shall work with the appropriate Native Americans as identified by the Native American Heritage Commission as provided in Public Resources Code SS5097.98. The applicant may develop an agreement for treating or disposing of, with appropriate dignity, the human remains and any items associated with Native American burials with the appropriate Native Americans as identified by the Native American Heritage Commission. Action implementing such an agreement is exempt from:
 - (1) The general prohibition on disinterring, disturbing, or removing human remains from any location other than a dedicated cemetery (Health and Safety Code Section 7050.5).
 - (2) The requirement of CEQA and the Coastal Act.

1.3.2 San Diego County Local Register of Historical Resources

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

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

1.3.3 Traditional Cultural Properties / Tribal Cultural Resources

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

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

The County of San Diego Guidelines (2007a) identify that cultural resources can also include TCPs, such as gathering areas, landmarks, and ethnographic locations in addition to archaeological districts. These guidelines incorporate both State and Federal definitions of TCPs. Generally, a TCP may consist of a single site, or group of associated archaeological sites (district; traditional cultural landscape), or an area of cultural/ethnographic importance.

The Traditional Tribal Cultural Places Bill of 2004 requires local governments to consult with Native American representatives during the project planning process. The intent of this legislation is to encourage consultation and assist in the preservation of "Native American places of prehistoric, archaeological, cultural, spiritual, and ceremonial importance" (County of San Diego 2007a). It further allows for tribal cultural places to be included in open space planning. State Assembly Bill (AB) 52, in effect as of July 1, 2015, introduces the Tribal Cultural Resource (TCR) as a class of cultural resource and additional considerations relating to Native American consultation into CEQA. As a general concept, a TCR is similar to the federally-defined TCP; however, it incorporates consideration of local and state significance and required mitigation under CEQA. A TCR may be considered significant if included in a local or state register of historical resources; or determined by the lead agency to be significant pursuant to criteria set forth in PRC §5024.1; or is a geographically defined cultural landscape that meets one or more of these criteria; or is a historical resource described in PRC §21084.1, a unique archaeological resource described in PRC §21083.2, or is a non-unique archaeological resource if it conforms with the above criteria.

In 1990, the NPS and Advisory Council for Historic Preservation introduced the term “TCP” through National Register Bulletin 38 (Parker and King 1998). A TCP may be considered eligible based on “its association with cultural practices or beliefs of a living community that (a) are rooted in that community’s history, and (b) are important in maintaining the continuing cultural identity of the community” (Parker and King 1998:1). Strictly speaking, Traditional Cultural Properties are both tangible and intangible; they are anchored in space by cultural values related to community-based physically defined “property referents” (Parker and King 1998:3). On the other hand, TCPs are largely ideological, a characteristic that may present substantial problems in the process of delineating specific boundaries. Such a property’s extent is based on community conceptions of how the surrounding physical landscape interacts with existing cultural values. By its nature, a TCP need only be important to community members, and not the general outside population as a whole. In this way, a TCP boundary, as described by Bulletin 38, may be defined based on viewscape, encompassing topographic features, extent of archaeological district or use area, or a community’s sense of its own geographic limits. Regardless of why a TCP is of importance to a group of people, outsider acceptance or rejection of this understanding is made inherently irrelevant by the relativistic nature of this concept.

DRAFT

2.0 GUIDELINES FOR DETERMINING SIGNIFICANCE

2.1 CEQA GUIDELINES

The following guidelines are used in determining whether the proposed Project would have a significant environmental impact to cultural resources:

- (1) The project causes a substantial adverse change in the significance of a historical resource as defined in §15064.5 of the State CEQA Guidelines. This shall include the destruction, disturbance or any alteration of characteristics or elements of a resource that cause it to be significant in a manner not consistent with the Secretary of Interior Standards.
- (2) The project causes a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the State CEQA Guidelines. This shall include the destruction or disturbance of an important archaeological site or any portion of an important archaeological site that contains or has the potential to contain information important to history or prehistory.
- (3) The project disturbs any human remains, including those interred outside of formal cemeteries.
- (4) The project proposes activities or uses damaging to significant cultural resources as defined by the Resource Protection Ordinance and fails to preserve those resources.
- (5) The project proposes activities or uses that would cause a substantial adverse change in the significance of a tribal cultural resource as defined under Public Resources Code §21074.

The Guidelines listed above have been selected for the following reasons:

Guidelines 1 and 2 are derived directly from CEQA. Sections 21083.2 of CEQA and 15064.5 of the State CEQA Guidelines recommend evaluating historical and archaeological resources to determine whether or not a proposed action would have a significant effect on unique historical or archaeological resources.

Guideline 3 is included because human remains must be treated with dignity and respect and CEQA requires consultation with the “Most Likely Descendant” as identified by the Native American Heritage Commission (NAHC) for any project in which human remains have been identified.

Guideline 4 was selected because the Resource Protection Ordinance requires that cultural resources be considered when assessing environmental impacts. Any project that would have an adverse impact (direct, indirect, and cumulative) on significant cultural resources as defined by this Guideline would be considered a significant impact. The only exemption is scientific investigation.

All discretionary projects are required to be in conformance with applicable County standards related to cultural resources, including the noted RPO criteria on prehistoric and historic sites, as well as requirements listed in the Zoning Ordinance, General Plan, and the Grading, Clearing and Watercourses Ordinance (§87.429). Non-compliance would result in a project that is inconsistent with County standards.

Guideline 5 was selected because tribal cultural resources are of cultural value to Native American tribes. Any project that would have an adverse impact (direct, indirect, and/or cumulative) on a significant tribal cultural resource as defined by PRC §21074 would be considered a significant impact.

3.0 ANALYSIS OF PROJECT EFFECTS

3.1 NATIVE AMERICAN PARTICIPATION

Coordination with knowledgeable representatives of Native Americans is an important component of site identification, assessment of potential site sensitivity, and identification of appropriate mitigative actions required for any resources potentially impacted by a proposed project.

ASM requested a search of the Sacred Lands File (SLF) from the NAHC for information on any recorded Native American cultural sites located within the vicinity of the project area. Cultural Resources Analyst, Murphy Donahue from the NAHC was contacted and provided a negative result to the sacred land file check. Copies of the NAHC request is included on Appendix B of this report.

The NAHC provided a list of 20 Tribal contacts which may have additional information on the project area. ASM sent information request letters to the 20 Tribal contacts on March 14, 2024. To date, ASM has only received two responses.

On March 20, 2024, Daniel Tsosie, Cultural Resources Manager of the Campo Band of Mission Indians, responded that Campo has concerns about the proposed project, Jacumba should be treated as a culturally sensitive area, and Campo wishes to be involved in the project.

Lisa Cumper of the Jamul Indian Village responded via phone call that that she is interested and would respond via letter, which has not yet been received.

Boe Wiley, Native American monitor from Grey Wolf representing the La Posta Reservation, conducted monitoring alongside the ASM field archaeologists to observe the evaluation and to report the findings to the tribal authority or organization.

As of August 2024, government to government AB-52 consultation was still in process. AB-52 consultation letters were mailed on April 18, 2024, with a requested response date of May 24, 2024. Two tribes responded requesting consultation under AB 52, including the Campo Kumeyaay Nation and Manzanita Band of the Kumeyaay Nation. Once complete, a summary of the consultation will be included in the Final MND.

3.2 SURVEY METHODS

The field survey was conducted on March 13, 2024, by ASM Archaeologists Lucas Piek and Zandra Mikhael, accompanied by Boe Wiley from Grey Wolf Monitoring serving as the Native American monitor. Prior to the start of fieldwork, the survey area was plotted on electronic versions of U.S. Geological Survey (USGS) 7.5-minute topographic maps. The entire Project area was inventoried for cultural resources during a pedestrian archaeological surface survey. All personnel walked together as a team in continuous parallel transects spaced 15 meters apart. The transects were walked from the southwest to the northeast across the Project area. Any exposed granitic bedrock outcrops were inspected. Upon discovery of an artifact or feature, the team halted while the person who made the discovery scouted the area to determine whether the item was isolated, associated with only a few other items, or part of a larger site deposit. All isolates, sites, and features were recorded. Archaeological sites and isolates were distinguished by artifact density. All site and isolate locations were recorded in Universal Transverse Mercator (UTM) coordinates using handheld GeoExplorer Trimble units with sub-meter accuracy. Notes and photographs were taken to describe all features and artifacts. Sites were plotted on project maps using NAD 83 UTM coordinates. Site

3. Analysis of Project Effects

information was recorded on State of California DPR 523 series forms to State of California standards. The Project area was photographed. Ground surface visibility was low due to the presence of dense vegetation across the Project area. No artifacts were removed from the Project area during the survey.

3.3 RESULTS

The archaeological survey of the project area noted that 95 percent of the project area was covered by springtime grasses like filaree, African grass, and mustard plant. The project area was relatively flat with evidence of previous agricultural use. No artifacts were identified during the course of the survey. No evidence of SDI-8072 was identified during the survey.



Figure 3.1 Overview of project area, facing north.



Figure 3.2 Overview of CA-SDI-8072, facing south.

4.0 INTERPRETATION OF RESOURCE IMPORTANCE AND IMPACT IDENTIFICATION

4.1 RESOURCE IMPORTANCE

The County of San Diego is the lead review agency for the Project. Accordingly, the sites have been evaluated for eligibility for the CRHR under CEQA Guidelines as well as being evaluated for importance under the County Guidelines. While sites may be recommended as eligible or not eligible for listing on the CRHR under the County Guidelines all sites are considered “important.” Under the County Guidelines, the “importance” of sites recommended as not eligible for listing on the CRHR can be exhausted through testing, the curation of artifacts, and construction monitoring.

4.1.1 Archaeological Sites

CA-SDI-8072 has been previously recorded as a highly diffuse scatter of camp debris including Tizon and Buff ware ceramic sherds, a mano, a milling basin fragment, a scraper plane, hammerstones, cores, and basalt flakes across the ground surface. Dudek (DeCarlo et al. 2020) found that the site had a low potential for significant buried deposits or culturally sensitive materials and recommended that SDI-8072 was not significant under CEQA, not eligible for listing in the CRHR or Local Register, and not considered a contributor to the significance of the JVAD.

Dudek’s evaluation of SDI-8072 found that the site did not contain substantial or diverse archaeological deposits that could be used to develop or refine local or regional culture histories. Instead, it produced low quantities of limited diversity chipped stone assemblages, primarily consisting of cortical and interior flakes, and rock shatter representing incipient tool production. Minor amounts of brownware aboriginal ceramic sherds indicate some transient occupation possibly taking advantage of seasonally available resources, but no evidence of longer term or more residentially stable occupation was identified. The site is considered to have low information potential pursuant to significance under CEQA Criterion 4.

The project area is within the JVAD, south of the Table Mountain District and southwest of the In-Ko-Pah Discontiguous District. As stated in the 2013 district nomination, this site is listed as a contributing factor to the overall importance of the JVAD:

The Jacumba Valley Archaeological District is significant at the state and local level under Criteria A and D. The district is eligible for listing in the NRHP under Criterion A for its contribution to at least two themes related to the broad patterns of our history: Development of a Traditional Cultural Landscape in Jacumba Valley and Sacred and Traditional Importance of Story, Ceremony, and Ritual to the Kumeyaay. The extensive ethnographic record documenting the cultural landscape and Traditional Cultural Properties in Jacumba Valley and the largely undisturbed setting related to these properties, make Jacumba Valley an exceptional example within these two themes. With respect to Criterion D, the information content of the prehistoric archaeological sites in Jacumba Valley sites has yielded and will continue to yield regionally important information about the paleoenvironment, chronology and culture history (Native American Ethnic Heritage and Social History), prehistoric settlement patterns, subsistence and seasonality, mobility and exchange systems (Commerce), technological organization (Industry), ceremonial practices (Religion), and ethnicity/cultural affiliation (Native American Ethnic Heritage) of the hunter-gatherer groups that traversed and occupied southern San Diego and Imperial counties from the Late Archaic through the early Historic period.

Since the Dudek 2020 evaluation of SDI-8072 identified no significant archaeological deposit and no midden soils or other evidence of habitation or any organic datable materials, this site is not considered a contributor to the significance of the JVAD.

4.1.2 Tribal Cultural Resources

No culturally or spiritually significant sites were identified within the Project area through communication with the Native American monitors present during fieldwork. During Native American consultation with the Campo Band of Kumeyaay Indians (Campo), the importance of the mountain viewsheds surrounding the Project was expressed. Campo also requested a site visit with the County, which is being scheduled. No other Traditional Cultural Properties that currently serve religious or other community practices are known to exist within the project area and no artifacts or remains were identified or recovered during the archaeological survey that are known to be associated with such practices.

Pursuant to AB 52, government-to-government consultation will be initiated by the County of San Diego with traditionally and culturally affiliated tribes. To date, no Tribal Cultural Resources have been identified for the project site. Consultation is ongoing between the County and two tribes, the Campo Band of Mission Indians and the Manzanita Band of the Kumeyaay Nation. Once complete, a summary of the consultation will be included in the Final MND.

4.2 IMPACT IDENTIFICATION

CEQA utilizes the term “impact” much in the same way that NHPA refers to “effects.” CEQA Section §21084.1 states that significant impacts may occur if “a project may cause a substantial adverse change in the significance to a historic resource.” CEQA defines adverse impacts as a substantial adverse change to a historical resource, encompassing “demolition, destruction, relocation, or alteration such that the significance of an historical resource would be impaired.”

4.2.1 Archaeological Sites

The proposed project will result in grading of the northern portion of SDI-8072. SDI-8072 has been previously recommended not significant under CEQA, not eligible for listing in the CRHR or local register, and not a significant resource under County RPO. SDI-8072 was recommended as not considered a contributor to the significance of the JVAD. ASM agrees with this recommendation based on the current study. As such, impact to this site because of project implementation will not be considered significant.

4.2.2 Tribal Cultural Resources

No tribal cultural resources were identified within the proposed project site. In addition, the Native American consultants did not express any concerns. Therefore, the Project will not have an impact on Tribal Cultural Resources.

5.0 MANAGEMENT CONSIDERATIONS—MITIGATION MEASURES AND DESIGN CONSIDERATIONS

5.1 UNAVOIDABLE IMPACTS

ASM recommends that the project will not result in a substantial adverse change in the significance of a historical resource and therefore there are no unavoidable impacts in accordance with CEQA Guidelines Section 15064.5(b).

5.1 MITIGABLE IMPACTS

The project for the Jacumba Fire Station would require the grading and excavation of approximately 2.77 acres of land within a 5-acre property in the southwest corner of APN 660-150-18-00, northwest of the Jacumba Airport. This work would result in the potential destruction of possible archaeological material located in the northern half of CA-SDI-8072 within the JVAD. While SDI-8072 is recommended not eligible for listing on the CRHR or Local Register under County guidelines, all archaeological sites are considered important. Impacts to the importance of the sites is mitigated through application of measures that include curation of all collected artifacts and documentation, and construction monitoring. Implementation of the following mitigation measures/conditions of approval will reduce impacts to these sites to less than significant.

Archaeological and Native American Monitoring

Implement an archaeological and Native American monitoring program to mitigate potential impacts to undiscovered buried archaeological resources within the project area. This program shall include, but shall not be limited to, the following actions:

- a. Provide evidence to the Department of General Services that a County certified archaeologist has been contracted to implement the monitoring program to the satisfaction of the Director of General Services. A letter from the Principal Investigator shall be submitted to the Director of General Services. The letter shall include the following guidelines:
 - (1) The project archaeologist shall contract with a Native American monitor to be involved with the grading monitoring program as outlined in the County of San Diego Report Format and Content Guidelines (2006).
 - (2) The County certified archaeologist and Native American monitor shall attend the pre-grading meeting with the contractors to explain and coordinate the requirements of the monitoring program as outlined in the County of San Diego Report Format and Content Guidelines (2006).
 - (3) The project archaeologist shall monitor all areas identified for development including off-site improvements.
 - (4) An adequate number of monitors (archaeological/Native American) shall be present to ensure that all earth moving activities are observed and shall be on-site during all grading activities for areas to be monitored.
 - (5) During the original cutting of previously undisturbed deposits, the archaeological monitor(s) and Native American monitor(s) shall be onsite full-time to perform full-time monitoring. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist in consultation with the Native American monitor. Monitoring of cutting of previously disturbed deposits will be determined by the Principal Investigator.

5. Management Considerations

- (6) Isolates and clearly non-significant deposits shall be minimally documented in the field and the monitored grading can proceed.
- (7) In the event that previously unidentified potentially significant cultural resources are discovered, the archaeological monitor(s) shall have the authority to divert or temporarily halt ground disturbance operations in the area of discovery to allow evaluation of potentially significant cultural resources. The Principal Investigator shall contact the County Archaeologist at the time of discovery. The Principal Investigator, in consultation with the County staff archaeologist, shall determine the significance of the discovered resources. The County Archaeologist must concur with the evaluation before construction activities will be allowed to resume in the affected area. For significant cultural resources, a Research Design and Data Recovery Program to mitigate impacts shall be prepared by the Principal Investigator and approved by the County Archaeologist, then carried out using professional archaeological methods.
- (8) If any human bones are discovered, the Principal Investigator shall contact the County Medical Examiner. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant (MLD) as identified by the Native American Heritage Commission shall be contacted by the Principal Investigator in order to determine proper treatment and disposition of the remains.
- (9) Before construction activities are allowed to resume in the affected area, the artifacts shall be recovered and features recorded using professional archaeological methods. The Principal Investigator shall determine the amount of material to be recovered for an adequate artifact sample for analysis.
- (10) In the event that previously unidentified cultural resources are discovered, all cultural material collected during the grading monitoring program shall be processed and curated at a San Diego facility that meets federal standards per 36 CFR Part 79, and therefore would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within San Diego County, to be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid.
- (11) If grading exceeds one month, monthly status reports shall be submitted to the Director of General Services starting from the date of the notice to proceed to termination of implementation of the grading monitoring program. The reports shall briefly summarize all activities during the period and the status of progress on overall plan implementation. Upon completion of the implementation phase, a final report shall be submitted describing the plan compliance procedures and site conditions before and after construction.
- (12) In the event that previously unidentified cultural resources are discovered, a report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed and submitted to the satisfaction of the Director of General Services prior to the issuance of any building permits. The report shall include Department of Parks and Recreation Primary and Archaeological Site forms.
- (13) In the event that no cultural resources are discovered, a brief letter to that effect shall be sent to the Director of General Services by the consulting archaeologist that the grading monitoring activities have been completed.
- (14) Provide evidence to DGS that the above notes or reference to these notes have been placed on the Grading Plan.

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7.0 LIST OF PREPARERS AND PERSONS AND ORGANIZATIONS CONTACTED

Brian Williams (ASM Affiliates) acted as Principal Investigator.

Shelby Castells (ASM Affiliates) acted as Principal Investigator.

Terrence Luévano (ASM Affiliates) acted as Project Manager and co-authored the technical report.

Lucas Piek and Zandra Mikhael (ASM Affiliates) undertook the field survey.

Boe Wiley (Grey Wolf - La Posta) served as Native American monitor for the archaeological field survey.

NAHC conducted a Sacred Lands record search.

SCIC provided the confidential records search.

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8.0 LIST OF MITIGATION MEASURES AND DESIGN CONSIDERATIONS

| RESOURCES | MITIGATION |
|-------------|---|
| CA-SDI-8072 | a) A qualified archaeologist and Kumeyaay Native American monitor shall monitor all ground-disturbing activities as outlined in the conditions of approval. |

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APPENDICES

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APPENDIX A
SCIC Record Search Confirmation

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CONFIDENTIAL APPENDIX B
Confidential NAHC Correspondence

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CONFIDENTIAL APPENDIX C
Confidential Maps and DPR Form

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