



Campo Band of Mission Indians

Chairman Marcus Cuero
Vice-Chairwoman Kerm Shipp
Secretary Johnathan Mesa
Treasurer Annah Ceballos
Committee Steven M. Cuero
Committee Ronnie Lee Cuero
Committee Ronny Paipa

Susan Harris
Planning & Development Services
5510 Overland Ave, Suite 310
San Diego, CA 92123

RE: JVR Energy Park PDS2018-MUP-18-022, Log No. PDS2018-ER-18-22-001

Dear Ms. Harris

This letter is submitted on behalf of the Campo Band of Mission Indians regarding the JVR Energy Park project in Jacumba, CA.

The Kumeyaay people, of whom Campo is a part, are the indigenous people of the Jacumba region. Some of the oldest and most continuous archeological sites have been found in the region. Jacumba is a key location in the creator stories as told through the Shuluk Songs which document the travels of the creator through our region. As is noted in the Draft EIR, the Jacumba region was a major crossroads from the Pacific coast to the desert and Colorado River region. The assumption that multiple cultural sequences are caused by disparate cultural groups migrating through the region can also be explained as multiple cultural influences that moved between regions with, or without the corresponding human migrations. In fact, recent finds in the region reaffirm the Kumeyaay contention that continuity is the norm with adjustment and adaptation occurring through the trade, intermarriage and social contacts between the region and the neighboring peoples. (Ref. Cultural Setting, 2.11-2, JVR EIR Oct. 2020)

The Jacumba region is not only important as a precontact cultural site, after the establishment of the Mission at San Diego, Jacumba was one of the strongholds of the Kumeyaay who never came under the Mission control. In one major attack on San Diego in 1840 the Mexican soldiers pursued the Kumeyaay to the Jacumba region where they were ambushed and returned to San Diego in defeat. Historical evidence of these facts regarding this region are another important part of the story of Kumeyaay perseverance and survival. This was not discussed in the cultural setting.

A representative from Jacumba (then known as Jacum), was signatory to the Treaty of Santa Ysabel in 1852. Even then, a wide swath of village sites existed from Tecate to Jacumba along the current U.S. Mexican border. The EIR discusses the potential for impacts to 28 archeological sites. Archeological sites are often just a small part of the cultural resources of an area. Sometimes, it is the place between the locations of artifacts that is most important in cultural terms. This may be difficult or impossible to discern from a strictly artifact based investigation. The cultural landscape may play a far more critical role and would need on-site experts in the Kumeyaay cultural

landscape to make such a determination. Without this knowledge, it is difficult to understand how a determination that the Proposed Project ADI could be determined to lack standing for eligibility for listing under the CRHR or Local Register. Further, it does not appear to substantiate a mitigation to non-significance.

The Campo Band would like to review the archeological findings and participate in an on-site review to address the issues of cultural landscape. In addition, should the project go forward, Campo would like to ensure that any monitors have adequate understanding and expertise to discern significant resources be they prehistoric or historic, religious, ceremonial or utilitarian.

Further, Campo would like to assist in developing a plan for the removal, storage and curation of any items deemed to be impossible to leave in place.

For human remains, Campo would like to be immediately notified (contact: Johnathan Mesa 619 881-7160). The Kumeyaay Cultural Repatriation Committee should also be notified immediately.

If you have any questions call Johnathan Mesa, Tribal Secretary/Cultural Monitor Manager at 619 881-7160

Sincerely,



Marcus Cuero
Chairman
Campo Band of Mission Indians