



June 5, 2023

Tracy Zinn
T&B Planning
4909 Murphy Canyon Road, Suite 405
San Diego, CA 92123

Re: A Cultural Resources Survey and Update Memo for the Sunroad—East Otay Mesa Project, San Diego, California.

Dear Ms. Zinn,

This memo summarizes the results of a 2016 cultural resources survey and evaluation by ASM Affiliates, Inc. (ASM) and a 2023 survey of a sewer connection for the Sunroad—East Otay Mesa Specific Plan Amendment Project (Project) which covered the entire project area. The approximately 253 acre project is located in the East Otay Mesa area of San Diego County, California. The Project proponent proposes the creation of a Specific Plan Amendment which would allow for the establishment of light industrial use, along with an open space easement. Three wetland basins for vernal pool creation will be located southwest of the open space easement. The 2016 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 impacts on lands planned for development.

The project site is located generally at the northeastern corner of Otay Mesa Road and Harvest Road/SR-125 in the Otay Community Planning area, within unincorporated San Diego County. The project area is depicted on the Otay Mesa 7.5-minute USGS topographic quadrangle with Sections 25 and 26 of Township 18 South, Range 1 West (Figures 1, 2, and 3). The site includes nine individual parcels with the following Assessor's Parcel Numbers (APNs): 646-240-30, 646-310-17, 646-080-26, -27, -28, -29, -31, -32, and -33. The offsite sewer connection is located west of the project area along the Zinser Road right-of-way.

Four cultural resources are known to exist within the project area, and a fifth resource previously noted in the project area was confirmed to no longer be present (Castells 2016). Three of the cultural resources are prehistoric, SDI-9975, SDI-12337, and SDI-12730, with SDI-12337 consisting of a combination of seven total sites, SDI-5352, SDI-9974, SDI-10072, SDI-10735, SDI-17104, SDI-17105, and SDI-12337 that were combined into one large site due to their overlapping boundaries and/or close proximity to each other. The fourth resource is an historic segment of P-37-31491, an old alignment of Otay Mesa Road. The narrative below is predominantly drawn from the prior report by ASM (Castells 2016).

SDI-9975

SDI-9975 is a large open air quarry area/lithic procurement site measuring approximately 350 x 630 m, with a small habitation component. The site was resurveyed (Gallegos et al. 1999) and tested to determine site significance and eligibility for listing in the California Register of Historical Resources (CRHR) and the National Register of Historic Places (NRHP) (Gallegos et al. 2000). Based on the testing program, the boundary for site SDI-9975 was redefined to primarily the north side of Johnson Canyon. The recovered artifacts mostly demonstrate a surface quarry site, with the exception of a ridge area, which contained a higher density of formed tools, darkened soil, and one milling implement. Given good site integrity, various tool types and artifact density suggesting habitation, the ridge portion of SDI-9975 was determined as significant and eligible for listing in the California Register of Historic Resources (CRHR) and recommended for listing in the National Register of Historic Places (NRHP). Mitigation of impacts was achieved through the completion of the data recovery program for SDI-9975 (Gallegos et al. 2003).

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Only a small portion of the southern side of the site is within the current Project area. During ASM's 2016 survey, ASM did not relocate SDI-9975 within the Project area, probably due to dense vegetative cover and only a small portion of the recorded boundary of the site is within the Project area. Additionally, the portion of SDI-9975 within the Project area is in a designated Open Space Easement and will be avoided by direct impacts. It should be noted that the portion of SDI-9975 within the Project area was identified as not significant under CEQA and not eligible for the CRHR (Gallegos et al. 2000, 2003). Overall, the site remains an important resource under County of San Diego guidelines for determining significance. The site is not significant under County RPO. The Project was designed to place SDI-9975 within an Open Space Easement, curation of artifacts collected during past archaeological testing of the site, and monitoring of all grading within 50 ft. of the site boundaries will reduce the impacts to the site to less than significant.

SDI-12337

This site is a very large open air lithic air quarry area/lithic procurement site, measuring approximately 2,471 x 2,435 m. Gallegos's 2008 report stated SDI-12337 subsumed six prior sites that included SDI-5352, SDI-9974, SDI-10072, SDI-10735, SDI-17104, and SDI-17105. Due to this amalgamation, SDI-12337 was tested for significance during numerous phases. Significance testing of the SDI-5352 portion of SDI-12337 was conducted in 1992 by Gallegos & Associates and in 1994 by ASM. Significance testing of the SDI-9974 and SDI-10072 portions of SDI-12337 were also performed by ASM in 1994. The SDI-10735 portion was tested for significance by Mooney and Associates in 1987. Various portions of the original and expanded boundary for SDI-12337 were tested by Gallegos in 1995. The SDI-17104 and SDI-17105 portions were tested by Gallegos & Associates in 1992. Each of the testing efforts identified SDI-12337 as not significant for the CRHR and the site was also recommended not eligible for listing in the NRHP.

During the 2016 ASM survey, it was noted that dense grasses and other vegetation obscured the ground surface over much of the site, but where there were patches of visibility, artifacts were often observed on the ground. Overall, the site condition was very similar to that noted by Gallegos in 2008, but ASM did expand the site boundary on the eastern edge based on the presence of over 40 artifacts. Castells (2016) agreed with the prior site evaluations as discussed above, that the site was not significant and did not have further data potential on the basis of previous work. Therefore, it was determined that the site is not a significant resource pursuant to the guidelines of the Local Register, the CRHR, and CEQA, nor is the site significant under the County RPO. Prior archaeological investigations have substantially reduced the site's data potential and indicate that no significant subsurface cultural deposits are likely to be present. Further archaeological work at the site is not likely to produce substantially different or unique data that would change these conclusions. Under the County of San Diego's Guidelines for Determining Significance, SDI-12337 is an important resource; however, as stated above, the research potential has been reduced to less than significant.

SDI-12730

SDI-12730 is a 182 x 80 m site located on a small knoll overlooking Johnson Canyon with ground stone and flaked stone artifacts. Gallegos and Kyle (1992) performed the significance testing of the site in 1992 and found a high number of subsurface artifacts to a depth of 80 cm. As the site had potential to address important research questions under CEQA, it was identified as significant. During the 2016 survey by ASM, SDI-12730 was relocated but found to be in a more disturbed context. A portion of the site was disturbed by U.S. Border Patrol and by off-highway vehicle enthusiasts use, with highly visible road tracks. Approximately half of SDI-12730 is within the Project area Open Space Easement with the remaining portion of the site extending outside of the Project area. Despite these disturbances, the site is otherwise in the same condition. Based on the previous work conducted at the site, it was determined that the site be considered a significant resource pursuant to the guidelines of the Local Register, the CRHR, and CEQA. Under the County of San Diego's Guidelines for Determining Significance, SDI-12730 is an

important resource. SDI-12730 is eligible for listing in the CRHR under Criterion 4 because it has high research potential. SDI-12730 is not significant under the County RPO.

The portion of SDI-12730 within the Project area is located within the Open Space Easement and will be avoided by direct impacts. At least a 25-ft. buffer of open space surrounds SDI-12730. The Project was designed to place SDI-12730 within an Open Space Easement, curation of artifacts collected during past archaeological testing of the site, and monitoring of all grading within 50 ft. of the site boundaries will reduce the impacts to the site to less than significant.

P-37-031491

P-37-031491 the historic Otay Mesa Road alignment, a segment of which is within the Project area, consisting of a paved, undivided two-lane highway, running east-west. During the 2016 ASM survey, Otay Mesa Road was relocated in the same condition as its previous visit. The northern half, the west bound lane, is within the Project area. P-37-31491 is not eligible for CRHR listing or significant under CEQA, as a modern paved, undivided two lane highway that is not historically significant. Therefore, it was determined as not a significant resource pursuant to the guidelines of the CRHR, CEQA, and the Local Register, nor is the site significant under the County RPO. Under the County of San Diego's Guidelines for Determining Significance, P-37-31491 is an important resource; however, the Project will not have an impact to the resource. The Project will not cause a change to the alignment of the historic Otay Mesa Road alignment. The roadway contains modern paving, and the Project includes sewer work within the existing roadway within the modern paved area, the alignment of the road will remain unchanged and will not be impacted by the Project.

Historic Structure Location

The Gallegos 2008 report stated that a historic structure was identified in the far southeastern corner of the Project area. Additionally, the Gallegos 2008 study determined that the structure was not significant under CEQA and not eligible for listing in the CRHR. ASM's 2016 survey did not relocate the historic structure. It is presumed that the historic structure was fully removed from the Project area, including any foundations. Therefore, it was determined that the area containing the historic structure is not a significant resource pursuant to the guidelines of the Local Register, the CRHR, and CEQA, nor is the site significant under the County RPO. Therefore, no impacts are possible.

Offsite Sewer Connection Survey

A cultural resources survey of the offsite sewer connection along the Zinser Road right-of-way was conducted on May 11, 2023 by ASM archaeologist Michael Buxton and Native American monitor Erica Gonzalez from Jamul Indian Village. The survey consisted of a 450 meter long corridor that was 60 meters wide (30 meters on each side of the center line). Survey was conducted at 10 meter intervals as survey visibility was low due to much of the ground being covered by thick 12 inch tall grasses. The west end of the survey is near Interstate-805. This portion of the survey falls within the large, non-significant site of SDI-12337. No artifacts were observed during the survey and the non-significance determination for SDI-12337 remains the same.

Mitigation Measures and Design Considerations

As discussed by Castells (2016), avoidance through Project design is the recommended mitigation measure, and these measures remain adequate as of this memo. The recommended mitigation measures for the project are described in Table 1, and mostly reflect those from the 2016 study with the exception that vernal pools will no longer be created within the open space easement and there will no longer be any impacts within the open space. Monitoring by a qualified archaeologist and Native American Monitor is recommended for all ground disturbance within the Project area and within the off-site improvements. The portion of the project area that intersects SDI-12337 was determined not eligible for listing on the CRHR, Local Register, and County RPO and no further cultural resource studies are recommended for this project. If requested by the Native American monitor, repatriation of any prehistoric materials,

collected by the Native American monitor during construction monitoring will be repatriated to landscaped areas within the public park or within the parkways along the public streets, within an area and depth that will not be disturbed by future ground disturbance.

Table 1. Recommended Mitigation Measures following Castells 2016.

Site Designation	Impacted by the Project Design	Site Type	Evaluation	Mitigation Measure
SDI-9975	Avoided	Prehistoric Habitation Site and Artifact Scatter	Important resource under County Guidelines. A portion of the site outside the Project area is eligible for the CRHR or Local Register. Not significant under County RPO.	Impacts reduced to less than significant through the Project design, placing the resource within an open space easement.
SDI-12337	Impacted	Prehistoric Artifact Scatter	Important resource under County Guidelines. Not eligible for the CRHR or Local Register. Not significant under County RPO.	Impacts reduced to less than significant through curation of artifacts and grading monitoring.
SDI-12730	Avoided	Prehistoric Artifact Scatter	Important resource under County Guidelines. Eligible for the CRHR or Local Register. Not significant under County RPO.	Impacts reduced to less than significant through the Project design, placing the resource within an open space easement.
Historic Structure Location	No longer present, not impacted	Historic Structure, no longer present	Not an important resource under County guidelines. Not eligible for the CRHR or Local Register. Not significant under County RPO.	None
P-37-31491	Not Impacted	Road Alignment	Important resource under County Guidelines. Not eligible for the CRHR or Local Register. Not significant under County RPO.	None

Should you have any questions concerning this memo, please do not hesitate to contact me.

Sincerely,



Mark S. Becker, Ph.D., RPA
 Principal Investigator

References

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Figure 1. Project Vicinity

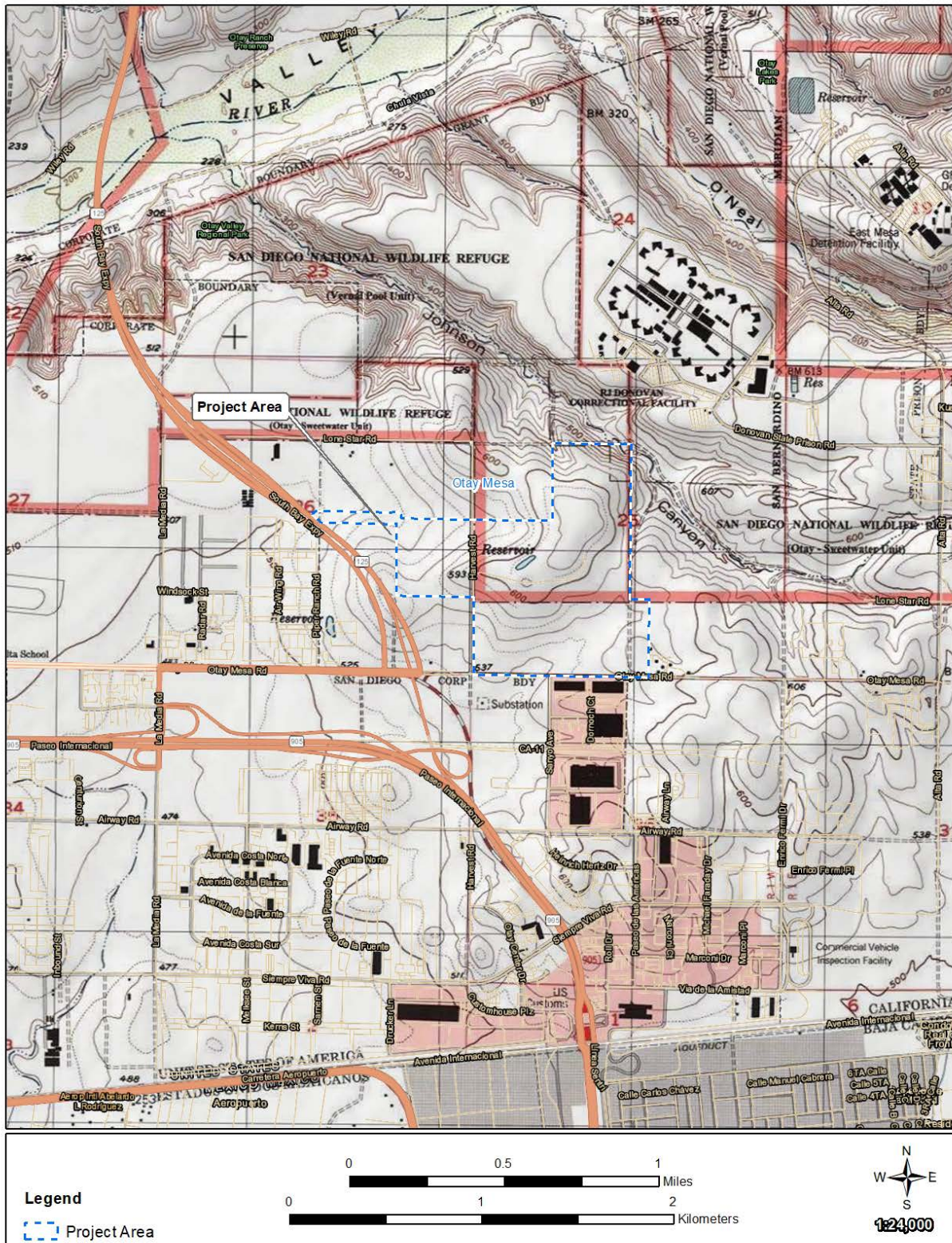


Figure 2. Project Location

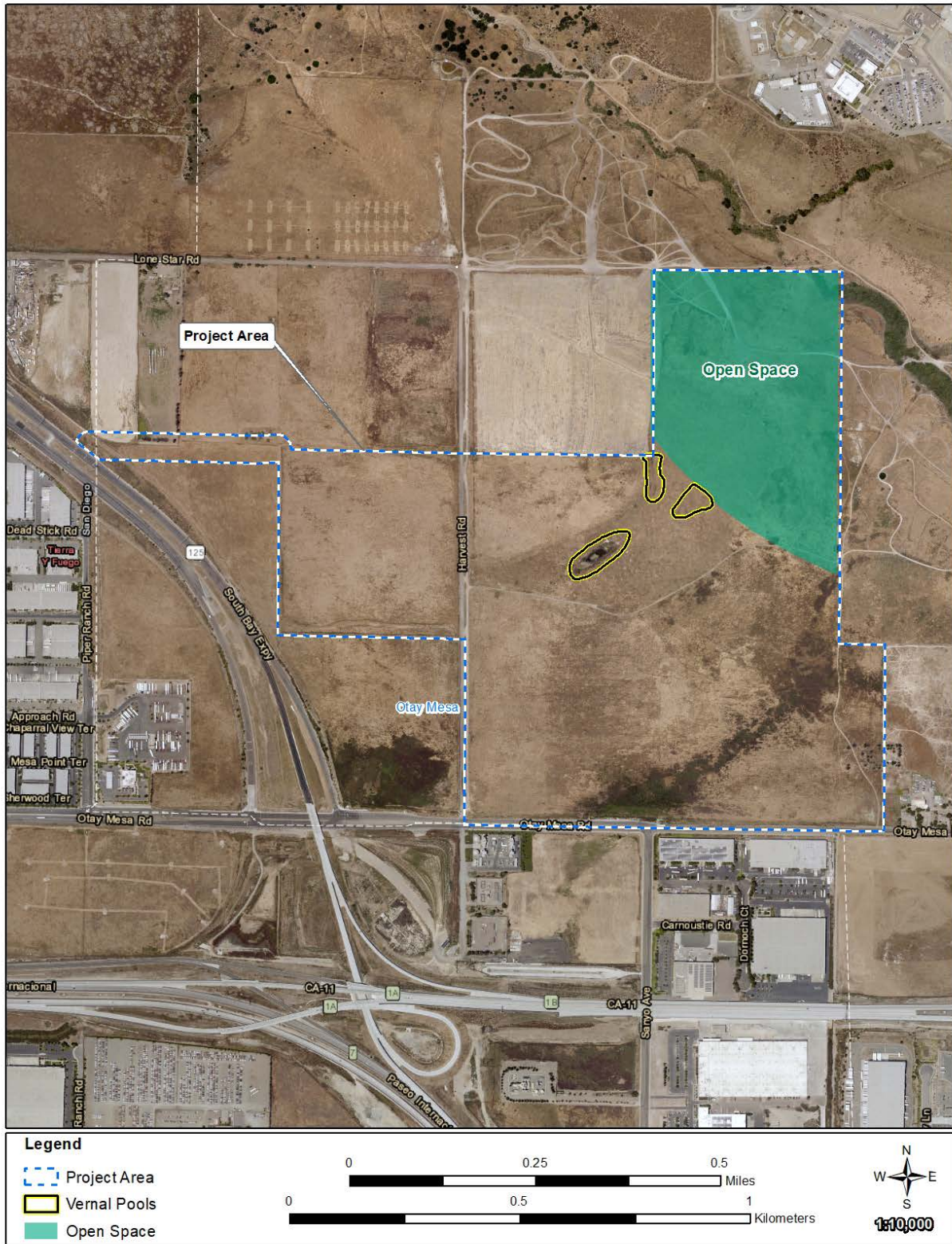


Figure 3. Location of Open Space and Vernal Pools within Project Area.