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November 29, 2022

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Title: A Negative Survey Report Using the Archaeological Resources Report Form (Appendix D) for the Palm and Hollister Project, San Diego, California

Dear Ms. Ruggels:

This report presents the archaeological and Native American survey results for the Palm and Hollister Project (Project) for assessor's parcel number (APN) 628-050-25-00, located at 555 Hollister Street in the Otay Nestor community of San Diego, California. The study was conducted in compliance with the California Environmental Quality Act and the City of San Diego Land Development Code.

I. PROJECT DESCRIPTION AND LOCATION

The project site is located in the Otay Nestor community of the City of San Diego, between the north/southbound streets of Hollister Street and Beyer Boulevard and the east/westbound streets of Palm Avenue and Main Street. The project area is located on the USGS 7.5' Imperial Beach, CA quadrangle, in the southwest quarter of Township 18S, Range 2W, Section 22 (Figures 1-3).

The Project includes the proposed construction of multi-family housing in the 5.92-acre lot, which would include 13 buildings housing 198 residential units, two resident amenity areas, and 268 parking spaces. Vehicular access to the project would be from the south along the western portion of the project site via an existing access easement through property owned by the Metropolitan Transit System (MTS). Pedestrian access to the Palm Avenue Trolley Station and Palm Avenue would also be provided with the access easement. No improvement to the access easement is anticipated at this time.

ASM Affiliates, Inc. (ASM) was contracted to provide a cultural resources inventory for the Project area, including an intensive pedestrian survey of the Project area. Steve Harvey, M.A., RPA, served as Principal Investigator for the survey. Associate Archaeologist Holly Drake, M.A., RPA, served as the Archaeological Field Director. RJ Flores from Jamul Indian Village served as the Native American monitor for the Project. All personnel involved in this project meet the qualifications of the City of San Diego to conduct the work described herein.

The proposed project requires an amendment to the Otay Mesa-Nestor Community Plan to change the existing land use designation from Open Space to Residential Medium-High Density (20-35 du/nra) and a Rezone to change the existing zone from AR-1-2, RM-1-1, and RS-1-5 to RM-2-6. A Rezone requires the proposed project analyze the most intense use permitted under the new zone. Under the proposed RM-2-6 zone, the project site could be developed to construct up to 206 dwelling units. This equates to an additional eight dwelling units compared to the proposed project, which plans to construct a total of 198 dwelling units. Adding eight dwelling units would not affect the analysis and conclusions of this Negative Survey Report, as both the proposed project and development with the most intense use would require disturbance of the same area of impact.

II. SETTING

Natural Setting

The project location lies within the coastal plains province of San Diego County. The project area is underlain by late Cenozoic sedimentary rocks, including the Pleistocene Bay Point Formation and Pliocene San Diego Formation (Kennedy, 1975; Kennedy and Tan, 2007). To the east in the foothills of the Peninsular Ranges are Mesozoic metamorphic and granitic rocks, which provided material for milling tools used by the prehistoric inhabitants of the region, and quartz dikes within the granitic rocks provided a local material for manufacturing flaked stone tools. The region's prime source of material for flaked stone tools was the metavolcanic rock of the Santiago Peak Volcanics, which is available in streambeds in low-lying areas approximately 20 kilometers to the southwest.

The climate is classified as Mediterranean Hot Summer, or Csa in the Köppen classification (Pryde 2004). Rainfall is about 33 centimeters (cm) per year, falling primarily between December and March. The average January daily minimum temperature is 4°C (39°F), and the average July daily maximum is 32°C (90°F). The climate would have imposed few constraints on prehistoric hunter-gatherers in the region.

The predominant natural vegetation community of the region is chaparral, although perhaps mixed with coastal sage scrub (Pryde 2004). Typical plant species include laurel sumac (*Rhus laurina*), black sage (*Salvia mellifer*a), manzanita (*Arctostaphylos* spp.), redshank (*Adenostoma sparsifolium*), oak (*Quercus* spp.), chamise (*Adenostoma fasciculatum*), and California lilac (*Ceanothus* sp.), along with various grasses and legumes. Riparian species are associated with drainages. Mammals, birds, and reptiles within these communities provided potential food resources to prehistoric inhabitants. Much of the natural vegetation in low-lying areas has been displaced by modern land uses for grazing and orchards. However, the steep mountain slopes harbor relatively intact, dense chaparral and oak communities. These vegetation communities have been in place since the early Holocene, by at least 7500 years before present (B.P.), when the climate became noticeably warmer and drier (Axelrod 1978).

Prehistoric Period

Archaeological fieldwork along the southern California coast has documented a diverse record of human occupation extending from the early Holocene into the ethnohistoric period (Erlandson and Colten 1991; Jones 1992; Moratto 1984). Several different regional chronologies, often with overlapping terminology, are used in coastal southern California, and they vary from region to region (Moratto 1984: Figures 4.5 and 4.17). Today, the prehistory of San Diego County is generally divided into three major temporal periods: Paleoindian, Archaic, and Late Prehistoric. These periods are characterized by patterns in material culture that represent distinct regional trends in the economic and social organization of prehistoric groups. In addition, some scholars, referring to specific areas, utilize several cultural terms synonymously with these temporal labels: San Dieguito for Paleoindian, La Jolla for Archaic, and Cuyamaca for Late Prehistoric (Meighan 1959; Moriarty 1966; Rogers 1939, 1945; True 1966, 1970; Wallace 1978; Warren 1964).

Paleoindian Period

The antiquity of human occupation in the New World is still a considerable debate spanning the last several decades. A model that is currently widely accepted is that humans first entered the western hemisphere between 13,000 and 15,000 B.P. While there is no firm evidence of human occupation in coastal southern California prior to 12,000 B.P., dates as early as 23,000 B.P. and even 48,000 B.P. have been reported (Bada et al. 1974; Carter 1980; Rogers 1974). However, the amino acid racemization technique by which some of these older dates were obtained is largely discredited through more recent accelerator mass spectroscopy dating of early human remains along the California coast (Taylor et al. 1985). Despite intense

interest and a long history of research, no widely accepted evidence of human occupation of North America dating before 15,000 B.P. has emerged.

As in most of North America, the earliest recognized period of California prehistory is termed Paleoindian. In southern California, this period is usually considered to date from at least 10,000 B.P. until 8500 to 7200 B.P. (Moratto 1984; Warren et al. 2008) and is represented by what is known as the San Dieguito complex (Rogers 1966). San Dieguito assemblages are composed almost entirely of flaked stone tools within the local classificatory system, including scrapers, choppers, and large projectile points (Warren 1987; Warren et al. 2008). Until recently, the near absence of milling tools in San Dieguito sites was the significant difference between Paleoindian economies and the lifeways that characterized the later Archaic period.

Based upon relatively scant evidence from a small number of sites throughout San Diego County, it is hypothesized that the people linked to the San Dieguito complex lived within a specialized hunting society with the band-level organization. This portrayal is essentially an extension to the inland and coastal areas of San Diego County of what has long been considered a continent-wide Paleoindian tradition. This immediate post-Pleistocene adaptation occurred within a climatic period characterized by somewhat cooler and moister conditions than presently. The range of possible economic adaptations of San Dieguito bands to this environment is poorly understood at present, but it is typically assumed that these groups followed lifeways similar to other Paleoindian groups in North America. This interpretation of the San Dieguito complex as the local extension of a post-Clovis tradition is based primarily on materials from the Harris Site in the San Dieguito River drainage (Ezell 1983, 1987; Warren 1966, 1967).

Archaic Period

The Archaic (also referred to as the Early Milling period) extends back at least 7,200 years, possibly as early as 9000 B.P. (Moratto 1984; Rogers 1966; Warren et al. 2008). Archaic subsistence is generally considered to have differed from Paleoindian subsistence in two significant ways. First, gathering activities were emphasized overhunting, with shellfish and seed-collecting of particular importance. Second, milling technology, frequently employing portable ground stone slabs, appears. The shift from mostly terrestrial hunting to a more maritime-based subsistence focus is traditionally seen as marking the transition from the Paleoindian to the Archaic period. In reality, the implications of this transition are poorly understood from both an economic and cultural standpoint (see Warren et al. 2008 for a broader review).

Early Archaic occupations in San Diego County are most apparent along the coast and the major drainage systems that extend inland from the coastal plains (Moratto 1984). Coastal Archaic sites are characterized by cobble tools, basin metates, manos, discoidals (disk-shaped grinding stones), a small number of Pinto- and Elko-series dart points, and flexed burials. Together, these elements typify the La Jolla complex in San Diego County, which appears as the early coastal manifestation of a more diversified way of life.

For many years, the typical model has included something that D. L. True (1958) termed the Pauma complex, an archaeological construct based upon several inland Archaic-period sites in northern San Diego that appeared to exhibit assemblage attributes different from Archaic coastal sites. Pauma complex sites were typically located on small saddles and hills overlooking stream drainages and were characterized by artifact scatters of basin and slab metates, manos, some scraper planes, debitage, and occasional ground stone discoidals. Further analysis suggests that the Pauma complex is simply an inland counterpart to the coastal La Jolla complex (Cardenas and Van Wormer 1984; Gallegos 1987; True and Beemer 1982). Given that the distance between the coastal and inland environments is only a few dozen kilometers, and that sites attributed to each complex appear to be contemporaneous, it seems more parsimonious to consider the differences in materials as seasonal manifestations of a mobile residence strategy using both coastal and inland resources (see Bayham and Morris 1986; Sayles 1983; Sayles and Antevs 1941).

In recent years, local archaeologists have questioned the traditional definition of the Paleoindian San Dieguito complex as consisting solely of flaked lithic tools and lacking milling technology. There is speculation that differences between artifact assemblages of "San Dieguito" and "La Jolla" sites may reflect functional differences rather than temporal or cultural variability (Bull 1987; Gallegos 1987; Wade 1986). Gallegos (1987) proposed that the San Dieguito, La Jolla, and Pauma complexes are manifestations of the same culture; that is, different site types result from differences in site locations and resource exploitation (Gallegos 1987:30). This hypothesis, however, has been vigorously challenged by Warren and others (2008).

In short, our understanding of the interplay between human land use, social organization, and material culture for the first several millennia of San Diego prehistory is poorly developed, although some progress has been made. Recent data collection has accelerated in paleoenvironmental analysis, paleoethnobotany, faunal analysis, and lithic technology studies. More importantly, efforts are being made to reexamine the assumptions surrounding existing artifact typologies and climatic reconstructions that form the basis of the traditional systematics.

Late Prehistoric Period

In his later overview of San Diego prehistory, Malcolm Rogers (1945) hypothesized that around 2000 B.P., Yuman-speaking people from the Colorado River region began migrating into southern California. This hypothesis was based primarily on patterns of material culture in archaeological contexts and his reading of linguistic evidence. This "Yuman invasion" is still commonly cited in the literature, but some later linguistic studies suggest that the movement may have been northward from Baja California.

Assemblages derived from Late Prehistoric sites in San Diego County differ in many ways from those in the Archaic tradition. The occurrence of small, pressure-flaked projectile points, the replacement of flexed inhumations with cremations, the introduction of ceramics, and an emphasis on inland plant food collection, processing, and storage are only a few cultural patterns that were well established by the second millennium A.D. The centralized and seasonally permanent residential patterns that had begun to emerge during the Archaic period became well established in most areas. Inland semisedentary villages appeared along major watercourses in the foothills and in montane valleys where seasonal exploitation of acorns and piñon nuts was common, resulting in milling stations on bedrock outcrops.

The Late Prehistoric period is represented in the northern part of San Diego County by the San Luis Rey complex (Meighan 1954; True et al. 1974) and by the Cuyamaca complex in the southern portion of the county (True 1970). The San Luis Rey complex is the archaeological manifestation of the Shoshonean predecessors of the ethnohistoric Luiseño, while the Cuyamaca complex reflects the material culture of the Yuman ancestors of the Kumeyaay (also known as Diegueño, Ipai, and Tipai).

The San Luis Rey complex is typically divided into two phases: San Luis Rey I and II. San Luis Rey I is a pre-ceramic phase initially thought to date from approximately 2000 B.P. to 500 B.P. (True et al. 1974). The material culture of this phase includes small triangular pressure-flaked projectile points, manos, portable metates, *Olivella* spp, shell beads, drilled stone ornaments, and mortars and pestles. The San Luis Rey II phase differs only in the addition of ceramics and pictographs. Firm dates for the introduction of ceramics have not been satisfactorily documented, but a date of between ca. A.D. 800 and A.D. 1300 is generally accepted. Evidence compiled by Griset (1986) indicates that the introduction and diffusion of ceramic technology throughout San Diego is more complex than previously thought.

According to True and others (1974), the Cuyamaca complex, while similar to the San Luis Rey complex, is differentiated by its greater frequencies of side-notched points, flaked stone tools, ceramics, and millingstone implements, a more comprehensive range of ceramic forms, a steatite industry, and cremations

placed in urns. Assigning significance to these patterns should be done with caution, however, since it is evident that seasonal camps in upland areas would reflect a different economic focus and would involve a slightly different set of trade relations than would be expected for populations on the seaboard. Thus, a good deal of the variation in artifact form might be attributable to functional differences or point of origin. Gross and others (1989) have suggested that these differences may not serve as indicators of cultural affiliation, and some may be due to different levels of organization. Regarding site structure, we might also expect occupational spans to differ between coastal and inland camps, given the shorter summers at higher elevations.

Ethnohistoric and Historic Periods

In general, the term Kumeyaay has come into common usage to identify the Yuman-speaking people living in the central and southern part of San Diego County at the time of Spanish contact, although some descendants of these people consider themselves Diegueño or Ipai. The Kumeyaay people established a material culture described in detail in Waterman (1910), Spier (1923), and others. The Kumeyaay were organized into large groups with base camps and an extensive territory exploited for specific resources. Based on ethnohistoric and ethnographic information, many village sites have been identified throughout San Diego County. Given the general ethnohistoric accounts of the Kumeyaay, groups residing along the San Diego River and Bay could have utilized several ecological niches varying by altitude. A review of the ethnographic and ethnohistoric record indicates that most groups moved to different areas on a seasonal basis to capitalize on particular crops such as acorns or agave and were not wholly dependent on any one resource.

The Spanish were the first Europeans to make contact with native Southern Californians, beginning their colonization of Alta California with the establishment of the San Diego Mission de Alcalá in A.D. 1769 (Schaefer and Van Wormer 2008). By 1821, Mexico gained independence from Spain, and San Diego came under Mexican rule. The war between Mexico and the United States for control of the western territories erupted in 1846, and San Diego soon fell to the U.S. Army, with California becoming a state in 1850 (Schaefer and Van Wormer 2008). Between 1845 and 1870, San Diego County experienced a frontier period, transforming the region from a “feudal-like society to an aggressive capitalist economy” (Schaefer and Van Wormer 2008: VI-6). Urban development between 1870 and 1930 established the City of San Diego.

III. AREA OF POTENTIAL EFFECT

The area of potential effect (APE) is located at 555 Hollister Street (APN 628-050-25-00). The lot measures 5.92 acres, of which 5.5-acres are planned for grading activities associated with construction for the project. As the APE was negative for Historical Resources, no indirect or cumulative impacts were considered for the project. As the APE was negative for Historical Resources, no indirect or cumulative impacts were considered for the project. There will be no impacts to the off-site easement owned by MTS.

IV. STUDY METHODS

Prior to the start of the Project, ASM conducted a records search of the California Historical Resources Information System at the South Coastal Information Center (SCIC) to determine whether any previously recorded cultural resources intersect the Project area. The records search included a search radius of one-mile (mi.) around the APE. Information reviewed included GIS shapefiles of previously recorded sites, California Department of Recreation (DPR) site records, a database of historic addresses, and National Archaeological Database (NADB) citations for reports on previous cultural investigations within the search radius. On March 22, 2022, a request was submitted to the California Native American Heritage Commission for a search of the Sacred Lands File to inquire if any registered cultural resources, traditional

cultural properties, or areas of Native American heritage are recorded within the proposed Project area or vicinity. A response was received on May 3, 2022 and indicated the APE was negative for tribal cultural resources. The response letter can be found in Attachment 4.

Archaeological and Native American survey was conducted during a single day, on March 29, 2022. The survey was conducted on foot in 15-meter intervals, when possible. Overview photographs were taken during the survey of the property. All information recorded remains on file at the ASM office in Carlsbad, California.

V. RESULTS OF STUDY

Results of Records Search

A total of 77 technical and research reports are on file at the SCIC that present the results of studies conducted within a one-mile radius of the Project area. Of those reports, six address the Palm and Hollister Project area. These six reports appear to include various archaeological and historical properties surveys and significance evaluations for large-scale projects in the area (Table 1).

The records search results also identified 38 previously recorded cultural resources and 20 historic addresses within the one-mile search radius. None of those resources intersect the project area (Table 2). Additionally, all of the cultural resources are at least 150 meters from the APE.

Table 1. Previously Conducted Cultural Resource Studies Intersecting the Project APE

NADB No.	Title	Author(s)	Year
SD-00304	Cultural Resources Reconnaissance of The San Diego Fixed Guideway Project Centre City to San Ysidro	WESTEC Services, Inc.	1978
SD-13850	Cultural Resource Survey and The Significance Evaluation of The Otay Mesa-Nestor Community Plan Amendment Study Area	ASM Affiliates, Inc.	1987
SD-05507	Historic Properties Inventory for Secondary Treatment, Clean Water Program for Greater San Diego, San Diego, California (DEP No. 89-0744)	Recon	1990
SD-02252	An Archaeological Impact Evaluation for The Otay River Valley Resource Enhancement Plan	Advanced Sciences, Inc.	1991
SD-09755	Cultural Resources Existing Conditions Assessment for The Otay Valley Regional Trails Project, Interstate 5 To Interstate 805 San Diego, California	Susan Hector Consulting	2005
SD-09920	Cultural Resources Survey for The Otay Valley Regional Park Trails Project, West of Interstate 5 To Interstate 805, San Diego, California	Susan Hector	2006

Table 2. Previously Recorded Cultural Resources within a One-mile Radius of the Project APE

Designation				
P-37-	CA-SDI-	Resource Attributes	Recorder, Date	Proximity to Project APE
56	56	AP15. Habitation Debris	N.C. Nelson, 1967	Outside
5513	5513	AP2. Lithic Scatter	J. Corum, 1978	Outside
7455	7455	AP2. Lithic Scatter; AP15. Habitation Debris	M. Roeder, 1980	Outside
7941	7941	AP2. Lithic Scatter	J. Corum, 1979	Outside

Designation		Resource Attributes	Recorder, Date	Proximity to Project APE
P-37-	CA-SDI-			
10639	10639	AP16. Other (Shell scatter); AH4. Trash scatter	W.R. Manley and S. Hector, 1986	Outside
10966	10966	AP12. Quarry	G.F. Carter, 1982	Outside
11962	11962	AP2. Lithic Scatter	D. Ferraro, 1990	Outside
11963	11963	AP16. Other (Shell scatter)	D. Ferraro, 1990	Outside
11964	11964	AP16. Other (Shell scatter)	D. Ferraro, 1990	Outside
11965	11965	AP16. Other (Shell scatter)	D. Ferraro, 1990	Outside
11966	11966	AP2. Lithic Scatter	D. Ferraro, 1990	Outside
12024	12024	HP2. Single family property	R. Collett, 1990	Outside
13072	13072	HP2. Single family property	S. Wade, 1993	Outside
13073	13073	AH7. Railroad	D. Laylander, 1993	Outside
13464	13464	AP2. Lithic Scatter; AP16. Other (Shell scatter)	S. Briggs and D. James, 1993	Outside
15894	--	HP33. Farm / Ranch	Brian F. Smith & Associates, 1997	Outside
25680	--	HP11. Engineering Structure; AH7. Railroad bed	S. Wee and P. Ferrell 2000	Outside
26582	--	HP4. Ancillary buildings; HP23. Ship (floating dredge); HPI 1. Engineering structures (industrial machinery); HP8. Industrial buildings; HP21. Dams (levees); HP22. Reservoirs (salt ponds)	C. Gregory and A. Gustafson 2001	Outside
28141	--	HP2. Single family property	J. Hirsch, 2006	Outside
28142	--	HP2. Single family property	J. Hirsch, 2006	Outside
28143	--	HP2. Single family property	J. Hirsch, 2006	Outside
28144	--	HP2. Single family property	J. Hirsch, 2006	Outside
28145	--	HP2. Single family property	J. Hirsch, 2006	Outside
28189	--	HP2. Single family property	J. Hirsch, 2006	Outside
28190	--	HP2. Single family property	J. Hirsch, 2006	Outside
28191	--	HP2. Single family property	J. Hirsch, 2006	Outside
28192	--	HP2. Single family property	J. Hirsch, 2006	Outside
28193	--	HP2. Single family property	J. Hirsch, 2006	Outside
28231	18332	AP16. Other (Shell scatter)	M. Sivba et al., 2007	Outside
28480	--	AP16. Other (Isolate)	L. Pierson, 2007	Outside
28481	18361	AP2. Lithic Scatter	L. Pierson, 2007	Outside
28554	--	HP26. Monument	Unknown, 1952	Outside
31061	19712	AP2. Lithic scatter; AP3. Ceramic scatter	S. Bietz, 2009	Outside
31428	19961	AH4. Trash scatter	H. Thompson, 2010	Outside
32633	20686	AP2. Lithic Scatter; AP16. Other (Shell scatter)	C. Davis, 2012	Outside
32634	20687	AP3. Ceramic scatter; AP15. Habitation debris	C. Davis, 2012	Outside
32853	20765	AP2. Lithic scatter	A. Giacinto, 2012	Outside
32871	20772	HP2. Single family property; HP33. Farm/ranch; HP4. Ancillary building; AH2. Foundations/structure pads; AH3. Landscaping/orchard	G. Fogel, 2012	Outside
33560	21090	AP2. Lithic Scatter	K. Tennesen, 2013	Outside
34967	--	HP3. Multiple family property	J. Krintz and S. Davis, 2012	Outside
34968	--	HP3. Multiple family property	J. Krintz and S. Davis, 2012	Outside
34988	--	HP6. 1-3 Story Commercial Building	J. Krintz and S. Davis, 2012	Outside

Designation		Resource Attributes	Recorder, Date	Proximity to Project APE
P-37-	CA-SDI-			
34989	--	HP6. 1-3 Story Commercial Building; HP36. Ethnic minority property	J. Krintz and S. Davis, 2012	Outside
35008	--	HP2. Single family property	J. Krintz and S. Davis, 2012	Outside
35039	--	HP33. Farm / Ranch	J. Krintz and S. Davis, 2012	Outside
35070	--	HP6. 1-3 Story Commercial Building	J. Krintz and S. Davis, 2012	Outside
35122	--	HP8. Industrial Building	J. Krintz and S. Davis, 2012	Outside
35123	--	HP8. Industrial Building	J. Krintz and S. Davis, 2012	Outside

Results of Survey

The intensive pedestrian survey of the Project APE provided no evidence for the presence of cultural resources. A dilapidated residential structure and associated outbuilding were observed during the survey. However, these buildings were previously assessed, determined by City staff not to be an historic resource, and are not included in the present investigation. A small scatter of fragmented shellfish remains was observed. However, it was found in a highly disturbed context in association with beach sand and appeared to be recently deposited, indicating that it is likely non-cultural shell imported to the site in fill or sandbags.

The majority of the Project area is comprised of flat land with variable amounts of ground surface visibility. The ground surface that was visible has been previously disturbed by agricultural activities, grading, and the addition of angular gravel. The Project area is currently being used as a storage yard for construction equipment and supplies. Approximately one-quarter of the APE, along the northern property boundary, slopes downward to the north and has poor ground surface visibility due to dense vegetation in that area.

VI. RECOMMENDATIONS

The cultural resources survey conducted for the Palm and Hollister Project by ASM was negative for Historical Resources except for the previously assessed buildings that were not included in the present study. While there is a very low probability for finding new historical resources within the APE, construction monitoring by a qualified archaeologist and Native American monitor is recommended for ground disturbing activities during the project construction phase. For the off-site easement, no impacts are currently anticipated for this project.

VII. CERTIFICATION

Preparer: Holly Drake, M.A., RPA

Title: Associate Archaeologist

Signature: 

Date: April 1, 2022
Revised November 29, 2022

VIII. ATTACHMENTS

1. National Archaeological Data Base Information

2. Bibliography

3. Maps and Photos:

Figure 1.	Overview of the Project Area, facing east.
Figure 2.	Project vicinity map.
Figure 3.	Location map of the project area.
Figure 4.	City of San Diego 800’ scale.

4. Response letter from the NAHC

ATTACHMENT 1

National Archaeological Data Base Information

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Report Date:	March 31, 2022 (Revised November 29, 2022)
Report Title:	A Negative Survey Report Using the Archaeological Resources Report Form (Appendix D) for the Palm and Hollister Project, San Diego, California
Submitted to:	Mitigation Monitoring Coordination (MMC) City of San Diego Development Services Department Land Development Review (LDR) Division 9601 Ridgehaven Ct, Suite 220 MS1102B San Diego, California 92123
Submitted for:	Karen L. Ruggels K L R Planning P.O. Box 882676 San Diego, California 92168-2676
USGS quadrangle:	Imperial Beach, CA (7.5-minute series)
Keywords:	Negative Survey, Cultural Resources, Palm and Hollister, Archaeological Survey, Nestor, San Diego, California

ATTACHMENT 2
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ATTACHMENT 3
MAPS AND PHOTOS

Figure 1. Overview of the Project area, facing east.

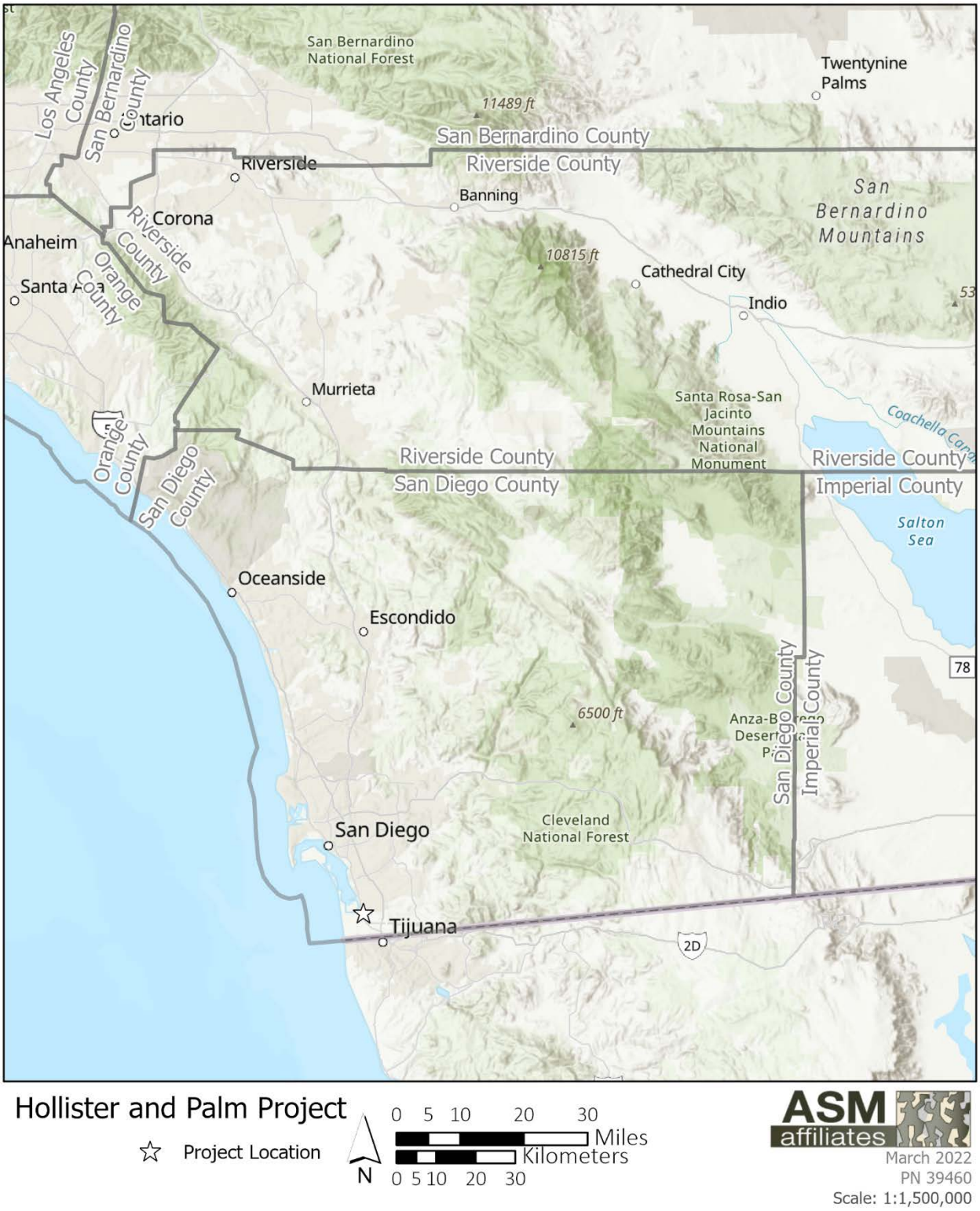

Figure 2. Vicinity map of the Project area.

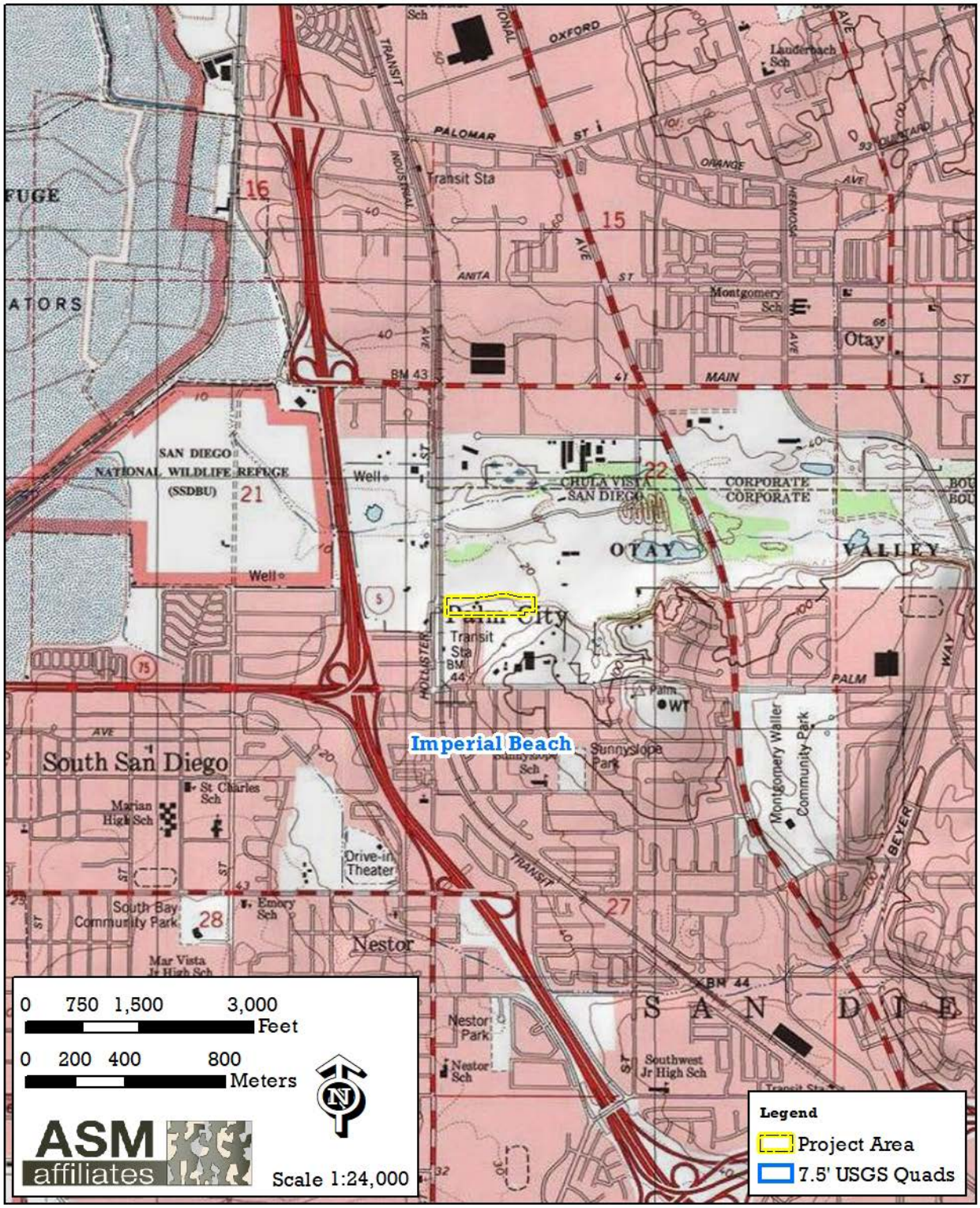

Figure 3. Location map of the Project area.

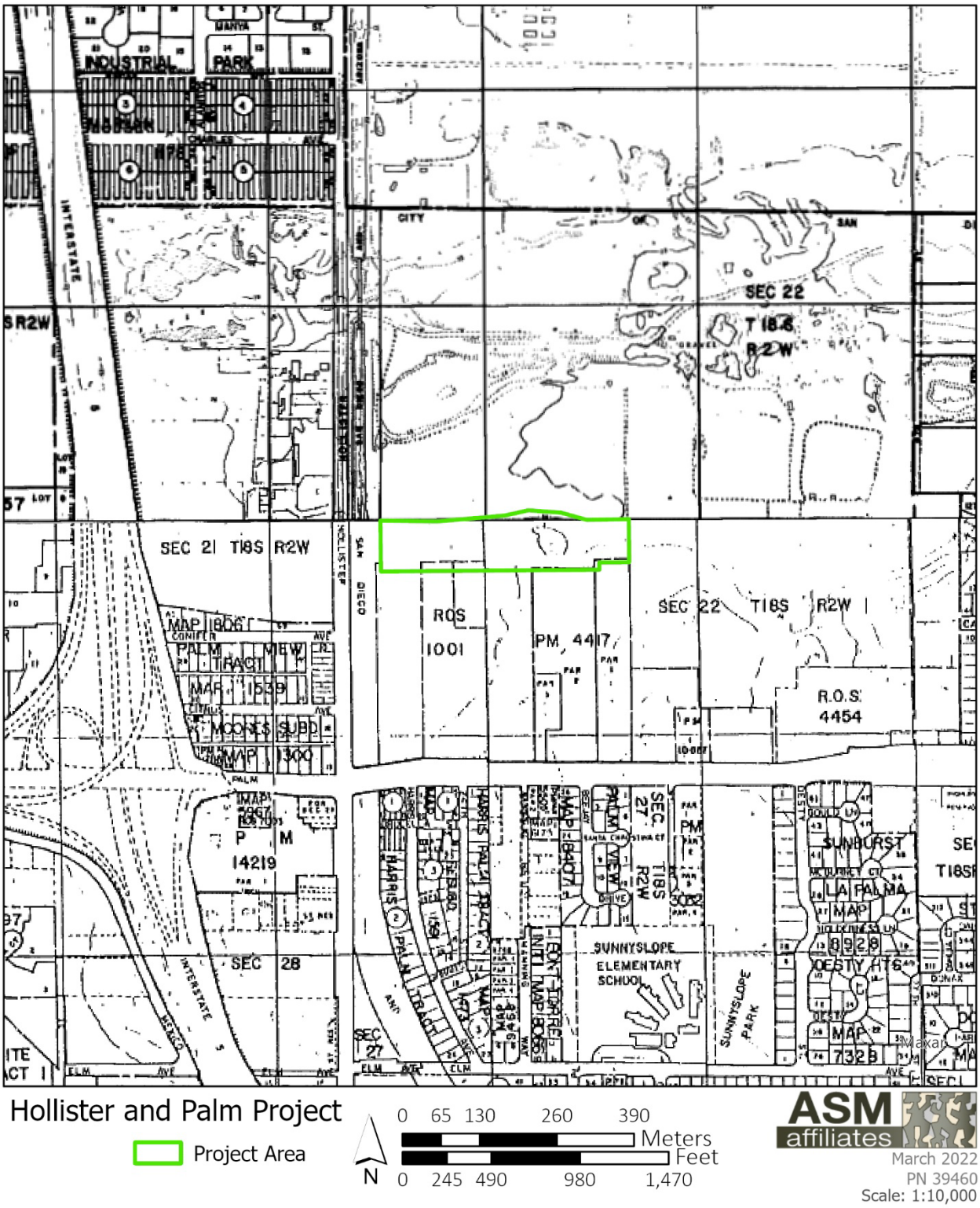

Figure 4. City of San Diego 800’ scale.

ATTACHMENT 4
RESPONSE LETTER FROM THE NAHC

NATIVE AMERICAN HERITAGE COMMISSION

CHAIRPERSON
Laura Miranda
Luiseño

VICE CHAIRPERSON
Reginald Pagaling
Chumash

PARLIAMENTARIAN
Russell Attebery
Karuk

SECRETARY
Sara Dutschke
Miwok

COMMISSIONER
William Mungary
Paiute/White Mountain Apache

COMMISSIONER
Isaac Bojorquez
Ohlone-Costanoan

COMMISSIONER
Buffy McQuillen
Yokayo Pomo, Yuki, Nomlaki

COMMISSIONER
Wayne Nelson
Luiseño

COMMISSIONER
Stanley Rodriguez
Kumeyaay

EXECUTIVE SECRETARY
Raymond C. Hitchcock
Miwok/Nisenan

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

May 3, 2022

Steve Harvey
ASM Affiliates, Inc.

Via Email to: sharvey@asmaffiliates.com

Re: Native American Tribal Consultation, Pursuant to the Assembly Bill 52 (AB 52), Amendments to the California Environmental Quality Act (CEQA) (Chapter 532, Statutes of 2014), Public Resources Code Sections 5097.94 (m), 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2 and 21084.3, Palm and Hollister Project, San Diego County

Dear Mr. Harvey:

Pursuant to Public Resources Code section 21080.3.1 (c), attached is a consultation list of tribes that are traditionally and culturally affiliated with the geographic area of the above-listed project. Please note that the intent of the AB 52 amendments to CEQA is to avoid and/or mitigate impacts to tribal cultural resources, (Pub. Resources Code §21084.3 (a)) ("Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.")

Public Resources Code sections 21080.3.1 and 21084.3(c) require CEQA lead agencies to consult with California Native American tribes that have requested notice from such agencies of proposed projects in the geographic area that are traditionally and culturally affiliated with the tribes on projects for which a Notice of Preparation or Notice of Negative Declaration or Mitigated Negative Declaration has been filed on or after July 1, 2015. Specifically, Public Resources Code section 21080.3.1 (d) provides:

Within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, the lead agency shall provide formal notification to the designated contact of, or a tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, which shall be accomplished by means of at least one written notification that includes a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation pursuant to this section.

The AB 52 amendments to CEQA law does not preclude initiating consultation with the tribes that are culturally and traditionally affiliated within your jurisdiction prior to receiving requests for notification of projects in the tribe's areas of traditional and cultural affiliation. The Native American Heritage Commission (NAHC) recommends, but does not require, early consultation as a best practice to ensure that lead agencies receive sufficient information about cultural resources in a project area to avoid damaging effects to tribal cultural resources.

The NAHC also recommends, but does not require that agencies should also include with their notification letters, information regarding any cultural resources assessment that has been completed on the area of potential effect (APE), such as:

1. The results of any record search that may have been conducted at an Information Center of the California Historical Resources Information System (CHRIS), including, but not limited to:

- A listing of any and all known cultural resources that have already been recorded on or adjacent to the APE, such as known archaeological sites;
- Copies of any and all cultural resource records and study reports that may have been provided by the Information Center as part of the records search response;
- Whether the records search indicates a low, moderate, or high probability that unrecorded cultural resources are located in the APE; and
- If a survey is recommended by the Information Center to determine whether previously unrecorded cultural resources are present.

2. The results of any archaeological inventory survey that was conducted, including:

    - Any report that may contain site forms, site significance, and suggested mitigation measures.

      All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure in accordance with Government Code section 6254.10.

3. The result of any Sacred Lands File (SLF) check conducted through the Native American Heritage Commission was negative.

4. Any ethnographic studies conducted for any area including all or part of the APE; and

5. Any geotechnical reports regarding all or part of the APE.

Lead agencies should be aware that records maintained by the NAHC and CHRIS are not exhaustive and a negative response to these searches does not preclude the existence of a tribal cultural resource. A tribe may be the only source of information regarding the existence of a tribal cultural resource.

This information will aid tribes in determining whether to request formal consultation. In the event that they do, having the information beforehand will help to facilitate the consultation process.

If you receive notification of change of addresses and phone numbers from tribes, please notify the NAHC. With your assistance, we can assure that our consultation list remains current.

If you have any questions, please contact me at my email address: Andrew.Green@nahc.ca.gov.

Sincerely,

Andrew Green

Andrew Green
Cultural Resources Analyst

Attachment

Native American Heritage Commission
Tribal Consultation List
San Diego County
5/3/2022

Barona Group of the Capitan Grande
Edwin Romero, Chairperson
1095 Barona Road — Diegueno
Lakeside, CA, 92040
Phone: (619) 443 - 6612
Fax: (619) 443-0681
cloyd@barona-nsn.gov

Campo Band of Diegueno Mission Indians
Ralph Goff, Chairperson
36190 Church Road, Suite 1 — Diegueno
Campo, CA, 91906
Phone: (619) 478 - 9046
Fax: (619) 478-5818
rgoff@campo-nsn.gov

Ewiiaapaayp Band of Kumeyaay Indians
Michael Garcia, Vice Chairperson
4054 Willows Road — Diegueno
Alpine, CA, 91901
Phone: (619) 933 - 2200
Fax: (619) 445-9126
michaelg@leaningrock.net

Ewiiaapaayp Band of Kumeyaay Indians
Robert Pinto, Chairperson
4054 Willows Road — Diegueno
Alpine, CA, 91901
Phone: (619) 368 - 4382
Fax: (619) 445-9126
ceo@ebki-nsn.gov

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

Inaja-Cosmit Band of Indians
Rebecca Osuna, Chairperson
2005 S. Escondido Blvd. — Diegueno
Escondido, CA, 92025
Phone: (760) 737 - 7628
Fax: (760) 747-8568

Jamul Indian Village
Erica Pinto, Chairperson
P.O. Box 612 — Diegueno
Jamul, CA, 91935
Phone: (619) 669 - 4785
Fax: (619) 669-4817
epinto@jiv-nsn.gov

Jamul Indian Village
Lisa Cumper, Tribal Historic Preservation Officer
P.O. Box 612 — Diegueno
Jamul, CA, 91935
Phone: (619) 669 - 4855
lcumper@jiv-nsn.gov

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

La Posta Band of Diegueno Mission Indians
Javaughn Miller, Tribal Administrator
8 Crestwood Road — Diegueno
Boulevard, CA, 91905
Phone: (619) 478 - 2113
Fax: (619) 478-2125
jmiller@LPtribe.net

La Posta Band of Diegueno Mission Indians
Gwendolyn Parada, Chairperson
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Phone: (619) 478 - 2113
Fax: (619) 478-2125
LP13boots@aol.com

Manzanita Band of Kumeyaay Nation
Angela Elliott Santos, Chairperson
P.O. Box 1302 — Diegueno
Boulevard, CA, 91905
Phone: (619) 766 - 4930
Fax: (619) 766-4957

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and section 5097.98 of the Public Resources Code.

This list is only applicable for consultation with Native American tribes under Public Resources Code Sections 21080.3.1 for the proposed Palm and Hollister Project, San Diego County.

Mesa Grande Band of Diegueno Mission Indians
Michael Linton, Chairperson
P.O Box 270 Diegueno
Santa Ysabel, CA, 92070
Phone: (760) 782 - 3818
Fax: (760) 782-9092
mesagrandeband@msn.com

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

Sycuan Band of the Kumeyaay Nation
Cody Martinez, Chairperson
1 Kwaaypaay Court Kumeyaay
El Cajon, CA, 92019
Phone: (619) 445 - 2613
Fax: (619) 445-1927
ssilva@sycuan-nsn.gov

Viejas Band of Kumeyaay Indians
John Christman, Chairperson
1 Viejas Grade Road Diegueno
Alpine, CA, 91901
Phone: (619) 445 - 3810
Fax: (619) 445-5337

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and section 5097.98 of the Public Resources Code.

This list is only applicable for consultation with Native American tribes under Public Resources Code Sections 21080.3.1 for the proposed Palm and Hollister Project, San Diego County.