



An Employee-Owned Company

July 19, 2023

Ms. Janice Kluth, AICP
City of Chula Vista
Development Services Department
276 Fourth Avenue
Chula Vista, CA 91910

Reference: Nakano Project - Addendum to Historical Resources Inventory and Evaluation Report for the Nakano Project (RECON Number 3396-1)

Dear Ms. Kluth:

The letter serves as an addendum to the Historical Resources Inventory and Evaluation Report for the Nakano Project (project), City of Chula Vista, San Diego County, California dated February 2022, prepared by Dudek. Subsequent to approval of the Dudek report (2022), the applicant incorporated proposed off-site trail improvements in addition to the proposed on-site trails already evaluated as part of the Dudek report. Additionally, an off-site wetland mitigation area is now proposed. To complete the February 2022 Dudek report, this letter details the results of additional cultural resources surveys conducted for the off-site trail improvement area (Figure 1) and the wetland mitigation area (Figure 2).

Additionally, based on RECON's review of the Dudek report, minor clarifications are provided below to clarify the use of terms.

Cultural Resources Surveys for Off-site Trail Improvement Area and Nakano Wetland Mitigation Area

Since approval of the February 2022 Dudek Report, off-site trail improvements are now proposed just north of the project parcel within the Otay Valley Regional Park (OVRP) on a property known as the Davies Property (Assessor's Parcel Number 02-41-346-02), as depicted on Figure 1. The proposed trail would follow the location of an existing informal trail alignment within disturbed land on the Davies property. The off-site trail improvements would consist of placement of decomposed granite within an eight-foot-wide trail alignment. Peeler pole fencing would be installed on one side of the trail. No grading is required for the off-site trail improvement and ground disturbance associated with the off-site trail improvement would be limited to digging fence post holes for the trail fencing.

Nakano wetland mitigation area is located off-site, in the city of San Diego, south of State Route 905 and east of Interstate 805 (see Figure 2). The mitigation area is approximately three miles southeast of the project area within Spring Canyon, in the City of San Diego Multi-Habitat Planning Area (MHPA) Preserve, on Tri Pointe Homes property. The mitigation area is surrounded by open space and occurs within existing riparian and disturbed habitat. The proposed compensatory mitigation project would provide 0.80 acre of wetland mitigation via the restoration of degraded wetlands which would be achieved off-site at the Spring Canyon location.

RECON conducted additional cultural resources surveys of the off-site trail improvement area and the wetland mitigation area. The primary goal of the pedestrian reconnaissance investigation was to survey the additional project impact areas associated with the trails and the wetland restoration area and determine if there are previously unrecorded cultural resources present, and if so, document the resources' locations and what they consist of. RECON archaeologist Nathaniel Yerka accompanied by Clinton Linton from Red Tail Environmental conducted the on-foot

survey of the off-site trail improvement area on November 1, 2022, using no more than two-meter spacing. Mr. Yerka was later accompanied by Anthony LaChappa from Red Tail Environmental on June 15, 2023, and conducted the on-foot survey of the Nakano wetland mitigation area using no more than 15-meter spacing. The survey areas were inspected for evidence of archaeological materials such as flaked lithic debris, flaked and ground stone tools, ceramics, milling features, and human remains.

Background Research

RECON reviewed the record search materials obtained by Dudek (2022) and confirmed no previously recorded cultural resources occur within the proposed off-site trail improvement area. RECON also reviewed topographic maps and historic aerial photographs and confirmed that no buildings or structures have existed within the additional survey area. The earliest available aerial photograph is from 1953 and exhibits the survey area subject to agricultural disturbance. Between 1978 and 1980 the eastern portion of the survey area suffered surface materials dumping and by 1989, the survey area was fully graded and was used as a vehicle or trailer storage area (Converse Consultants 2022).

For the wetland mitigation area, RECON reviewed in-house record search materials obtained for the concurrent Tri Pointe Homes Southwest Village project (Confidential Figure 1; RECON 2023) and noted one previously recorded cultural resource is located within the wetland mitigation area—CA-SDI-10,811. RECON also reviewed topographic maps and historic aerial photographs and confirmed that no buildings or structures have existed within the wetland mitigation area. The earliest available aerial photograph is from 1953 and exhibits the survey area with several footpaths and off-road vehicle (ORV) alignments running alongside as well as crossing the drainage area of Spring Canyon. By 1964, the prominent east-west ORV alignment crossing the southern end of the mitigation area is exhibited along with the associated culvert. Subsequent years represent little variation other than certain alignments becoming overgrown with vegetation where others appear to be favored for use (Nationwide Environmental Title Research LLC 2023).

CA-SDI-10,811

CA-SDI-10,811 is described as being located on a small river terrace bench on the eastern side of the Spring Canyon drainage where Spring Canyon meets Wruk Canyon. The site was described as a habitation site based upon the dark color of the soil, the types and distribution of artifacts, and presence of subsistence debris in the form of marine shellfish remains. The site was measured as occupying a 50-by-50-meter area and was surface-collected and tested in 1986 by WESTEC Services, Inc. The surface collection yielded 247 flakes, 94 angular waste fragments, 1 scraper fragment, and 5 utilized/modified flakes, while the subsurface component yielded 77 flakes, 141 angular waste fragments, 3 cores, 2 mano fragments, and 1 scraper. It was noted that the eastern portion of the site appears to be intact save for areas of bioturbation; however, the eastern portion of the site may have eroded away by the action of the Spring Canyon drainage. The site was determined not a significant historical resource by WESTEC Services (Cheever 1986).

Survey Results

Off-Site Trail Improvement Area

No additional prehistoric or historic cultural material was observed during the survey. The survey started at the northwest project area corner and proceeded east along the proposed trail improvement alignment (see Figure 1; Photographs 1 and 2). The area is fully disturbed by grading and surface debris, as well as current off-road vehicle usage. Noted surface items include piled and dispersed concrete and asphalt rubble, construction debris including

assorted metal, plastics, ceramics, and dimensional lumber, a dilapidated chain-link fencing alignment, discarded whole and fragmented wooden utility poles, a discarded reinforced concrete stormwater/sewer pipe section, imported base gravel, dumped vegetation waste materials, and dispersed modern rubbish.

Nakano Wetland Mitigation Area

No prehistoric or historic cultural material was observed within the wetland mitigation area during the survey. The survey commenced from the southern end of the wetland mitigation area, on the east side of the drainage and moved north. The survey finished on the west side of the drainage at the southern end of the survey area. The wetland mitigation area exhibited moderately shallow to approximately 15-foot-tall side slopes that varied in severity of steepness, with dense riparian vegetation cover, along with several smaller areas that were flat and open with dense and matted seasonal grasses. The drainage bottom is a scoured cobble-laden channel that varied in width between 3 to 10 feet with 1- to 5-foot-tall vertical sidewalls. RECON visited the South Coastal Information Center (SCIC) mapped location of CA-SDI-10,811 and did not observe any site material. The absence of site material is consistent with the provided information within the recording of CA-SDI-10,811, that the cultural material within the site area was surface collected; however, the provided locational description of CA-SDI-10,811 is inconsistent with the physical setting of the current mapped boundary. RECON believes the terrace upslope and adjacent to the east—outside of the current project boundary—better fits the physical setting provided within the recording of CA-SDI-10,811. Several isolated lithics were observed at the crest of the upslope terrace, near the wetland mitigation area but no tools or concentrations were noted. These isolated flakes are interpreted as part of the erosion of the likely location of CA-SDI-10,811.

Management Recommendations

No significant or potentially significant prehistoric or historic cultural resources were located during the survey of the trail improvement area. The South Coastal Information Center (SCIC) records search results do not indicate previously recorded cultural resources mapped within the additional survey area; however, the Dudek (2022) study did identify two previously recorded resources (P-37-007983 and P-37-026987) as well as two newly recorded resources (NK-S-001, and NK-S-002) within the project site; these resources were all recommended not significant under the California Environmental Quality Act (CEQA; Dudek 2022). The possibility of buried significant cultural resources being present within the developed trail improvement area is considered low due to the fact that no grading is required and limited disturbance would occur associated with installation of fence posts. Additionally, considerable past ground disturbance has reduced the likelihood of any near surface resources. Because of the disturbed condition of the additional survey area, including its current use as an informal trail, RECON recommends no additional work or monitoring in this area. Impacts to cultural resources associated with off-site trail improvements would be less than significant. However, since the Dudek historical resources report (2022) recommends archaeological monitoring during construction as project mitigation, this requirement would be applied to the entirety of the site including off-site improvement areas. The required mitigation measure entails preparation of an archaeological monitoring exhibit which would allow the areas that require monitoring to be refined based on the sensitivity and proposed disturbance.

No significant or potentially significant prehistoric or historic cultural resources were located during the survey of the wetland mitigation area. The SCIC records search results indicate the previously recorded CA-SDI-10,811 as mapped within the project area. RECON visited this mapped location and did not observe any site material. This observation is consistent with the recording of CA-SDI-10,811 as the site was surface-collected. The locational description provided with the recording of CA-SDI-10,811 is inconsistent with the physical setting of the current mapped boundary within the wetland mitigation area. RECON believes the terrace upslope and adjacent to the east—outside of the current project boundary—better fits the physical setting provided within the recording of CA-SDI-10,811. The possibility of

buried significant cultural resources being present within the wetland mitigation area is considered low due to the naturally disturbed condition of the active drainage. Furthermore, CA-SDI-10,811 was determined not a significant historical resource by WESTEC Services (Cheever 1986). Because of the lack of observed cultural material within the survey area, as well as the naturally disturbed condition of the survey area, RECON recommends no additional cultural resources work or monitoring for the wetland mitigation area. Impacts to cultural resources associated with the implementation of restoration efforts within the survey area would be less than significant.

Report Clarifications

Some clarification to the terms used in the Dudek report are provided herein as the term "historical resources" and "cultural resources" are not interchangeable terms. Cultural resources are generally categorized into two subtopics: archaeological and historic. Archaeological resources (generally located below ground surface) are divided into two categories: prehistoric and historic age. In our region, prehistoric archaeological resources date from before the onset of the Spanish Colonial period (1769 to 1848) and historic archaeological resources date from and after the onset of the Spanish Colonial period. An historic resource (generally located above ground) is any building, structure, or object that is at least 50 years of age and that is, or may be, significant architecturally or culturally in local, state, or national history.

As defined in CEQA Section 15064.5, historical resources, also called significant resources, are cultural resources, prehistoric or historic, that have been evaluated for their significance and determined eligible for listing in the California Register of Historical Resources (CRHR). According to CEQA Section 15064.5 (a), a historical resource includes the following:

1. A resource listed in, or determined to be eligible for listing on, the CRHR.
2. A resource included in the local register.
3. A resource which an agency determines to be historically significant. Generally, a resource shall be considered to be "historically significant," if the resource meets the criteria for listing on the California Register of Historical Places (Public Resources Code Section 5024.1 Title 14 California Code of Regulations, Section 4852) including the following:
 - a. Is associated with events that have made a significant contribution to the broad patterns of California's history or 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 maybe likely to yield, information important to prehistory or history.
4. The fact that a resource is not listed in or determined to be eligible for listing in the CRHR or a local register does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code Sections 5020.1(j) or 5024.1.

Table 1 identifies instances in the 2022 Dudek report where the term "cultural resources" should be used in place of "historical resources". While the Dudek report will not be updated, this memo is provided to clarify the use of terms.

Table 1 2022 Dudek Report Instances of the term "Historical Resources" that should be replaced with "Cultural Resources"				
Section	Page	Paragraph	Sentence	Revised Sentence
Management Summary	vii	2	3	The records search identified 52 cultural resources within 1 mile of the APE,...
Management Summary	vii	3	2	The NAHC responded on March 4, 2020, indicating that the search was negative for cultural resources within the project APE.
Management Summary	vii	5	3	Though recommended not eligible, the presence of the four cultural resources within the APE increases the probability that ground disturbing activities may encounter buried cultural resources.
2.3 SCIC Records Search	23	1	1	An examination of existing maps. Records, and report was conducted by Dudek to determine if the project could potentially impact previously recorded cultural resources.
2.3 SCIC Records Search	23	Header		Cultural Resources
2.3 SCIC Records Search	23	2	1	The records search identified 52 cultural resources within 1 mile of the APE,...
2.3 SCIC Records Search	23	2	4	Of the 52 cultural resources identified within 1 mile of the APE, two cultural resources, P-37-007983 and P-37-026987, intersect the APE.
2.3 SCIC Records Search/ Previous Cultural Studies	25	1	2	Two of these reports describe cultural resources identified within the current project APE.
2.4 NAHC Sacred Lands File Search	26	1	1	The NAHC responded on March 4, 2020 via a letter indicating that the search was negative for cultural resources within the project APE.
2.4 NAHC Sacred Lands File Search	26	2	2	After explaining the project area and the known cultural resources in the area, Ms. Cumper asked to be on the distribution list.
4.1 Survey	31	3	1	Documentation of cultural resources complied with the Office of Historic Preservation....
5.1 Survey Results	33	1	1	The pedestrian survey of the project APE included the revisiting of two previously identified resources and the identification of two new cultural resources....

Table 1 2022 Dudek Report Instances of the term "Historical Resources" that should be replaced with "Cultural Resources"				
Section	Page	Paragraph	Sentence	Revised Sentence
5.1.1 Previously Identified Historical Resources	33	Header		5.1.1 Previously Identified Cultural Resources
5.1.2 Newly Identified Historical Resources	34	Header		5.1.2 Previously Identified Cultural Resources
5.2 Archaeological Testing Results	34	1	1	The current study identified four cultural resources within the project APE.
6.1 Resource Evaluation	37	1	1	The current study identified four cultural resources that are located within the project APE that could have been potentially impacted by project activities:...
Table 4. Historical Resources Management Recommendations	39			Table 4. Cultural Resources Management Recommendations
6.2 Impacts Analysis and Recommendations	39	1	2	Though recommended not eligible, the presence of the four cultural resources within the APE increases the probability that ground disturbing activities may encounter buried cultural resources.
6.3 Mitigation Measures	39	1	1	Although all currently known cultural resources within the project APE are recommended no significant under CEQA, mitigation measures were developed to reduce the impacts to previously undiscovered potentially significant cultural resources.
6.3 Mitigation Measures	39	1	4	Both project scenarios propose the same development footprint and same impacts to cultural resources.

This addendum letter with noted clarifications and updates completes the Dudek report. Please call me at (619) 308-9333 ext. 133 if you have any questions.

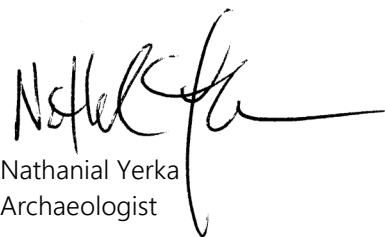
Sincerely,



Carmen Zepeda-Herman, RPA
 Senior Archaeologist

CZH:NDY:sh

Confidential Figure



Nathaniel Yerka
 Archaeologist

Ms. Janice Kluth, AICP

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References Cited

Cheever, Dayle

1986 Site Form for CA-SDI-10811 on file at the South Coastal Information Center located at San Diego State University.

Converse Consultants

2022 Phase I Environmental Site Assessment Report Assessor's Parcel Number (APN) 624 071 02 00, Chula Vista, California. March 10.

Dudek

2022 Historical Resources Inventory and Evaluation Report for the Nakano Project, City of Chula Vista, San Diego County, California. February.




Nationwide Environmental Title Research LLC

2023 Environmental Records, Property Records, Public Records & Historic Aerial Images.
<https://www.historicaerials.com/viewer>. Accessed June 14, 2023.

RECON Environmental, Inc.

2023 Results of the Historical Resources Investigation of the Southwest Village Specific Plan, San Diego, California. Project No. 614791. June 28.



-  Parcel Boundary
-  Impact Limits
-  Trail Improvement

0 Feet 300



FIGURE 1
Project Impacts with Trail Improvements







-  Parcel Boundary
-  Impact Limits
-  Trail Improvement
-  Nakano Wetland Mitigation Area



FIGURE 2
Project Locations on Aerial Photograph



PHOTOGRAPH 1
Overview of Trail Improvement Alignment from Northwest Project Corner,
Looking Northeast



PHOTOGRAPH 2
Overview of Eastern Portion of Trail Improvement Alignment, Looking West

CONFIDENTIAL FIGURE 1

Not for Public Review