



# CULTURAL RESOURCE ASSESSMENT FOR THE 6TH AT SPEAR APARTMENTS, EL CENTRO PROJECT, EL CENTRO, IMPERIAL COUNTY, CALIFORNIA

November 17, 2022



**CULTURAL RESOURCE ASSESSMENT FOR THE  
6<sup>TH</sup> AT SPEAR APARTMENTS EL CENTRO PROJECT,  
EL CENTRO, IMPERIAL COUNTY,  
CALIFORNIA**

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**Technical Report No.: 22-567**

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November 17, 2022

# ABSTRACT

PaleoWest, LLC (PaleoWest) was retained by Birdseye Planning Group to conduct a Phase I cultural resource study for the 6<sup>th</sup> at Spear Apartments El Centro Project (Project) in the city of El Centro, Imperial County, California. The proposed Project involves the construction of an affordable housing development on a 12-acre at the northeast corner of the intersection of 6<sup>th</sup> Street and Spear Avenue (Assessor's Parcel Number 053-740-040). The proposed Project is subject to the California Environmental Quality Act (CEQA) with the City of El Centro acting as the CEQA lead agency. Because the Project may seek federal funding assistance, the cultural resources study was also conducted in compliance with Section 106 of the National Historic Preservation Act (NHPA; Section 106).

The cultural resource assessment included the delineation of an Area of Potential Effects (APE), a California Historical Resources Information System (CHRIS) records search, Native American consultation, archival and background research, and a survey of the APE. The cultural resource records search of the CHRIS identified 13 prior cultural resource studies and 2 previously recorded cultural resources within a 0.5-mile radius of the APE. Both of these cultural resources consist of historic period water conveyance features. No cultural resources have been previously documented in the APE.

PaleoWest requested a review of the Native American Heritage Commission's Sacred Land Files (SLF) on November 3, 2022. In anticipation of the results from the SLF, PaleoWest also sent letters to a list of Native American contacts based on prior projects in the immediate area on November 3, 2022. To date, nine responses have been received.

A survey of the APE was conducted on November 8, 2022. Results of the survey indicate that no cultural resources were identified in the APE. Due to the paucity of available freshwater sources in the vicinity and the absence of known prehistoric archaeological sites in the immediate area, the sensitivity of the Project area for containing intact buried prehistoric archaeological resources is considered low. Furthermore, the lack of intensive historic-era development in the Project area suggests that the potential to encounter buried historic period archaeological resources during Project construction is relatively low.

Based on these results, PaleoWest recommends a finding of no historic properties affected under Section 106. However, PaleoWest recommends the following best management practices be implemented during Project construction.

- If cultural resources are encountered during Project related activities, work in the immediate area must halt and the Project Archaeologist should be contacted immediately to evaluate the find. If the discovery proves to be significant for listing on the California Register of Historical Resources and/or the National Register of Historic Places, additional work such as data recovery excavations may be warranted to mitigate any impacts per CEQA or adverse effects under Section 106.
- If human remains are found, existing regulations outlined in the State of California Health and Safety Code Section 7050.5 state that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code § 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner must be notified within 24 hours of positive identification as human. If the human remains are determined to be prehistoric, the Coroner will

notify the NAHC, which will determine and notify a most likely descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of being granted access and provide recommendations as to the treatment of the remains to the landowner.

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# 1 INTRODUCTION

PaleoWest, LLC (PaleoWest) was retained by Birdseye Planning Group to conduct a Phase I cultural resource study for the 6<sup>th</sup> at Spear Apartments El Centro Project (Project) in the city of El Centro, Imperial County, California (Project). The proposed Project involves the construction of an affordable housing development. The proposed Project is subject to the California Environmental Quality Act (CEQA) with the City of El Centro acting as the CEQA lead agency. Because the Project may seek federal funding assistance, the cultural resources study was also be conducted in compliance with Section 106 of the National Historic Preservation Act (NHPA; Section 106). This report documents the tasks conducted by PaleoWest, including a cultural resource records search, Native American outreach, survey, and preparation of this report.

## 1.1 PROJECT LOCATION AND DESCRIPTION

The proposed Project is at the northeast corner of the intersection of 6<sup>th</sup> Street and Spear Avenue in the southern portion of the city (Figure 1-1). More specifically, it lies in Sections 7 and 8, Township 16 South, Range 14 East, San Bernardino Baseline and Meridian, as depicted on the *El Centro, CA* U.S. Geological Survey (USGS) topographic quadrangle map. The Project area lies approximately 300 feet (ft) west of State Route 86 and 0.17-mile (mi) south of Interstate 8.

The proposed Project would develop affordable housing on an approximately 12-acre parcel (Assessor's Parcel Number 053-740-040) that is currently vacant. The Project would be built in four phases; each phase would involve the construction of 72 units within three buildings, with 24 units per building. Each building would be 3-stories in height and would contain 7 1-bedroom, 1 bathroom units, 11 2-bedroom, 1 bathroom units, and 6 3-bedroom, 2 bathroom units. A total of 520 parking spaces would be provided for the entire Project. A 2,133-square foot community building and a 193-square foot laundry facility would be constructed for each phase. A stormwater retention basin is planned to be constructed within Parcel 5 along the western site boundary.

## 1.2 AREA OF POTENTIAL EFFECTS

The Area of Potential Effects (APE) of an undertaking is defined in 36 CFR 800.16(d) as the "geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties if any such property exists." The APE is three-dimensional (depth, length, width) and includes all areas directly and indirectly affected by the proposed construction.

The APE lies on undeveloped land south and west of commercial developments and east of recently constructed two-story apartment complex (Figure 1-2). The multistory buildings that are proposed for the Project are generally consistent with the existing conditions of the surrounding area. Indirect effects (visual, auditory, and/or atmospheric) are expected to be limited to construction activities and will be temporary in nature. As such, the APE is limited to the 12-acre property site (APN 053-0740-040) (Figure 1-2).

The APE must be considered as a three-dimensional space and as such, should include any vertical components of the undertaking that could result in directly or indirectly altering the

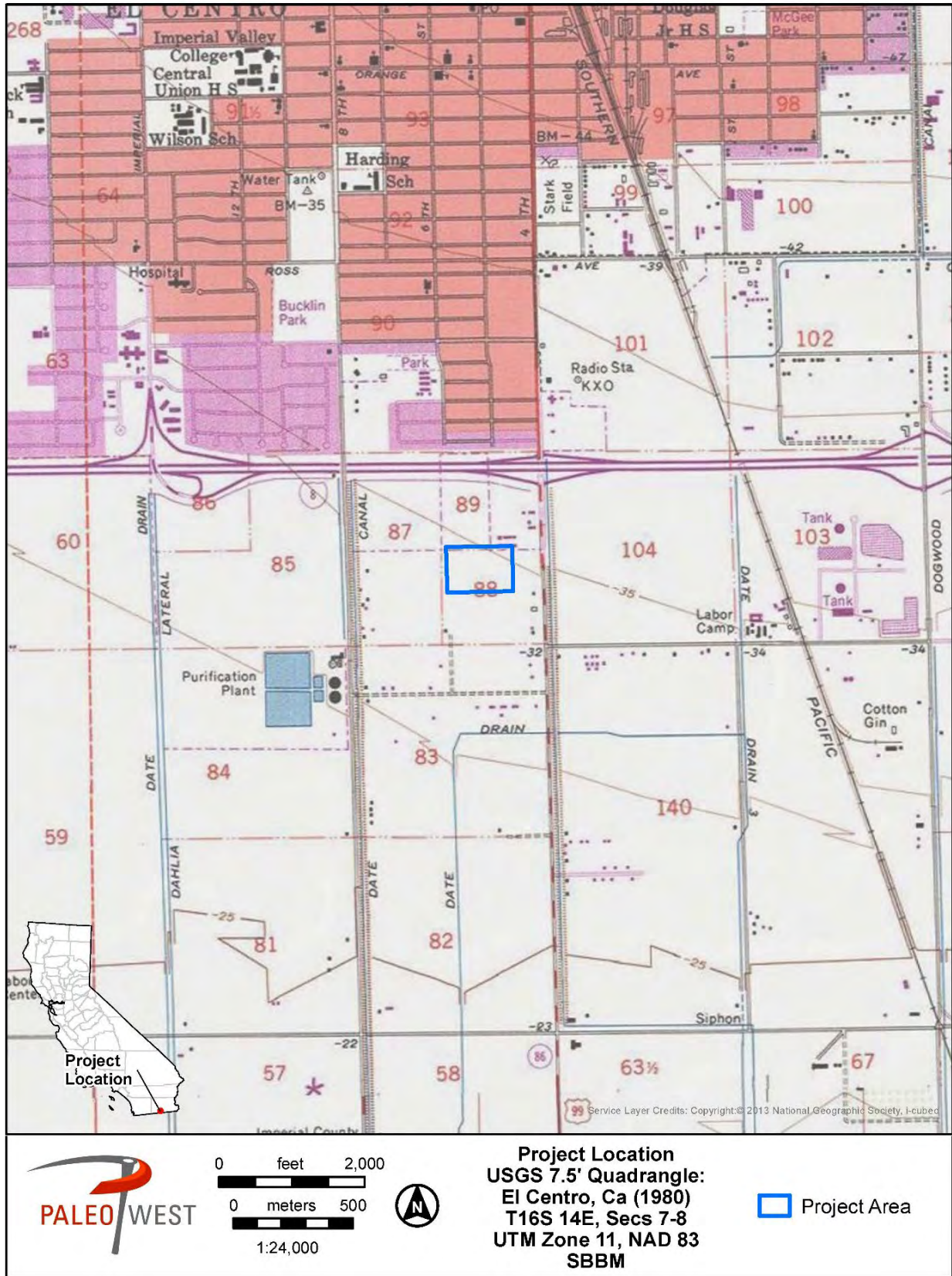


Figure 1-1. Project location map.





Figure 1-2. Map of Project APE.

character or use of historic properties. The vertical height of the APE extends up to approximately 36 feet above the current ground surface. The vertical depth of the APE is 8 feet below the current ground surface.

### 1.3 PERSONNEL

Associate Archaeologist, Paige Kohler, M.A., was the Project Manager and conducted the cultural resources records search, Native American outreach, pedestrian survey, and was the primary author of this report. Principal Archaeologist, Tiffany Clark, Ph.D., Registered

Professional Archaeologist (RPA), coauthored this report and served as Principal Investigator for the study. Dr. Clark meets the Secretary of the Interior's Professional Qualifications Standards for Prehistoric and Historic Archaeology (National Park Service [NPS] 1983). Kevin Hunt, B.A. served as the Principal in Charge for this Project.

## 2 REGULATORY SETTING

This section includes a discussion of the applicable laws, ordinances, regulations, and standards governing cultural resources that may pertain to the proposed Project.

### 2.1 FEDERAL REGULATIONS

#### 2.1.1 National Historic Preservation Act

The National Historic Preservation Act of 1966, as amended (54 United States Code [USC] 300101 et seq.) (NHPA), sets forth the responsibilities that federal agencies must meet in regard to cultural resources, especially Section 106 and its implementing regulations in 36 CFR Part 800. Federal agencies must conduct the necessary studies and consultations to identify cultural resources that may be affected by an undertaking, evaluate cultural resources that may be affected to determine if they are eligible for the National Register of Historic Places (NRHP) (that is, whether identified resources constitute historic properties) and assess the potential for effects (adverse or not) to historic properties associated with the proposed undertaking. Historic properties are resources that are listed on or eligible for listing in the NRHP (36 CFR 800.16[[1]). A property may be listed in the NRHP if it meets criteria provided in the NRHP regulations (36 CFR 60.4). Typically, such properties must also be 50 years or older (36 CFR 60.4[d]).

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, or association and

- That are associated with events that have made a significant contribution to the broad patterns of our history; or
- That are associated with the lives of persons significant in our past; or
- That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess artistic value, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- That have yielded, or may be likely to yield, information important in prehistory or history.

Section 106 defines an adverse effect as an effect that alters, directly or indirectly, the qualities that make a resource eligible for listing in the National Register (36 CFR 800.5[a][1]).

Consideration must be given to the property's location, design, setting, materials, workmanship, feeling, and association, to the extent that these qualities contribute to the integrity and significance of the resource. Adverse effects may be direct and reasonably foreseeable or may be more remote in time or distance (36 CFR 8010.5[a][1]).

## 2.2 STATE REGULATIONS

### 2.2.1 California Environmental Quality Act

The proposed Project is subject to compliance with CEQA, as amended. Compliance with CEQA statutes and guidelines requires both public and private projects with financing or approval from a public agency to assess their project's impact on cultural resources (Public Resources Code Sections 21082, 21083.2 and 21084 and California Code of Regulations [CCR] 10564.5). The first step in the process is to identify cultural resources that may be impacted by the project and then determine whether the resources are "historically significant" resources.

CEQA defines historically significant resources as "resources listed or eligible for listing in the California Register of Historical Resources (CRHR)" (Public Resources Code Section 5024.1). A cultural resource may be considered historically significant if the resource is 45 years old or older, possesses integrity of location, design, setting, materials, workmanship, feeling, and association.<sup>1</sup> In addition, it must meet at least one of the following criteria for listing in the CRHR:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. 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,
4. Has yielded, or may be likely to yield, information important in prehistory or history (Public Resources Code Section 5024.1).

Cultural resources are buildings, sites, humanly modified landscapes, traditional cultural properties, structures, or objects that may have historical, architectural, cultural, or scientific importance. CEQA states that if a project will have a significant impact on important cultural resources, deemed "historically significant," then project alternatives and mitigation measures must be considered.

### 2.2.2 California Assembly Bill 52

Signed into law in September 2014, California Assembly Bill 52 (AB 52) created a new class of resources—tribal cultural resources (TCRs)—for consideration under CEQA. TCRs may include sites, features, places, cultural landscapes, sacred places, or objects with cultural value to California Native American tribes that are listed or determined to be eligible for listing in the CRHR, included in a local register of historical resources, or a resource determined by the lead CEQA agency, in its discretion and supported by substantial evidence, to be significant and eligible for listing on the CRHR. AB 52 requires that the lead CEQA agency consult with California Native American tribes that have requested consultation for projects that may affect

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<sup>1</sup> The Office of Historic Preservation (OHP) guidelines recognize a 45-year-old criteria threshold for documenting and evaluating cultural resources (assumes a 5-year lag between resource identification and the date that planning decisions are made) (OHP 1995:2). The age threshold is an operational guideline and not specific to CEQA statutory or regulatory codes.

tribal cultural resources. The lead CEQA agency shall begin consultation with participating Native American tribes prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report. Under AB 52, a project that has potential to cause a substantial adverse change to a tribal cultural resource constitutes a significant effect on the environment unless mitigation reduces such effects to a less than significant level.

## 2.3 LOCAL

### 2.3.1 City of El Centro General Plan

The conservation/open space element of the City's General Plan (2004) includes the following goals and policies related to cultural resources:

**Goal 5:** Maintain local historic structures and places that provide a sense of continuity and unique character to El Centro.

- **Policy 5.1:** Encourage the preservation of structures and places with historic or community value, including the post office, library, County Courthouse, arcades in the downtown, and the railroad buildings.
- **Policy 5.2:** Protect and enhance the downtown area as the City's center of activity and community life.

## 3 ENVIRONMENTAL AND CULTURAL SETTING

### 3.1 ENVIRONMENTAL SETTING

The APE is within the Imperial Valley portion of the Salton Trough at an elevation of approximately 9.8 meters (m) (32 ft) below mean sea level. The APE, and Imperial Valley in general, is within the Colorado Desert section of the Sonoran Desert, which receives little rainfall (average of 76 millimeters [mm] or 3 inches [in] per year) and maintains high temperatures, particularly during the summer. Nevertheless, the APE is within a predominantly agricultural area supplied with Colorado River water via the All-American Canal system. Geologically, the APE is underlain by moderately well drained lacustrine sediments of Pleistocene and Holocene age. Average monthly low/high temperatures range from approximately 42.5/69.5 degrees Fahrenheit (5.8/20.8 degrees Celsius) in December to 77.8/106.7 degrees Fahrenheit (25.4/41.5 degrees Celsius) in July.

### 3.2 CULTURAL SETTING

The APE is in what generally is described as the Colorado Desert region (Schaefer and Laylander 2007:247). Though it shares similarities with the adjacent Mojave and Sonoran deserts, the Colorado Desert possesses a unique and distinct natural and cultural history.

Although now an arid region, a series of lakes collectively referred to as Lake Cahuilla (Lake LeConte, Blake's Sea) covered much of the Salton Trough throughout the Holocene. Lake Cahuilla was formed by the western diversion of the Colorado River into the Salton Trough when natural sediment barriers blocked the river's flow south to the Gulf of California. After at least three episodes of infilling and recession between A.D. 1200 and the late 1600s, Lake Cahuilla is believed to have receded for the last time around A.D. 1580, with a brief inundation in the late 1600s (Buckles and Krantz 2005; Laylander 1995; Schaefer and Laylander 2007; Waters 1983). The freshwater fish, shellfish, migratory birds, and riparian flora and fauna associated with the lake may have been important factors in human subsistence and settlement patterns during most of the prehistoric period.

Southern California's prehistory, including the Colorado Desert, is typically divided into three major periods: Paleoindian (ca. 9500–6500 B.C.), Archaic (ca. 6500 B.C.–A.D. 500), and Late Prehistoric (A.D. 500–contact) (Jones and Klar 2007; Moratto 1984). Paleoindian sites are generally identified by spear points associated with large game hunting and crescentics; Archaic sites by a preponderance of marine shell middens and portable ground stone tools associated with a collecting subsistence strategy; and Late Prehistoric sites with small projectile points for bow and arrow use, often of exotic lithic materials, ceramic pottery, and cremation of the deceased.

The Kumeyaay (also called Tipai, Kamia, or Desert Kumeyaay locally) occupied southern San Diego County including the current APE at the time of Spanish contact (Carrico 1987; Luomala 1978). The Kumeyaay language is considered a member of the Yuman language family. The Kumeyaay people practiced seasonal hunting and gathering with relatively large village centers (Moratto 1984). The easternmost Kumeyaay of the Colorado Desert practiced limited horticulture (Luomala 1978).

Father Eusebio Francisco Kino, a Jesuit missionary, reached the Colorado River in 1702 and was the first recorded Spanish explorer to enter the Colorado Desert. In 1771, Friar Francisco Garcés made trips into the region following Kino's route crossing the Colorado River from the east. Juan Bautista de Anza, a Spanish soldier, led a 1774 expedition accompanied by Garcés that successfully crossed the Colorado River into the Imperial Valley. In 1775, Anza returned and was accompanied by more than 240 emigrants and soldiers who crossed the Colorado into present-day Imperial County with assistance from the Yuma tribe (Pourade 1971). This group of emigrants established the mission and presidio of San Francisco. Anza's route across Imperial Valley became known as the Desert Trail, which was abandoned by European travelers following the 1781 destruction of Spanish settlements along the Colorado River by Quechan Indians. Among the destroyed were the missions of Puerto de Purísima Concepción and San Pedro y San Pablo de Bicuñer, which had been established in 1780 (Bean 1968:45). The Desert Trail was not used again until the Mexican Period.

European presence in the region expanded during Mexican Period (1822–1848) and American Period (1848–present), decimating and displacing the Kumeyaay. Their numbers were diminished as a result of European disease, relocation to reservations, and other factors (Carrico 1987). Also during the Mexican Period, the Desert Trail was reestablished by Mexico in 1822. Lieutenant of Engineers Romualdo Pacheco and several soldiers built and occupied an adobe fort along the route near the present-day city of Imperial in 1825–1826, the only Mexican fort in Alta California. On April 26, 1826, Kumeyaay Indians attacked the fort, killing three soldiers and wounding others, which led Pacheco to abandon the fort and return to San Diego (California OHP n.d.).

### 3.2.1 Imperial County

Imperial County was created on August 15, 1907, from the east half of San Diego County and was the last county to be organized within California (O'Dell 1957:8). The County occupies 4087 mi<sup>2</sup> and is bordered by Mexico to the south, the Colorado River and Arizona to the east, Riverside County to the north, and San Diego County to the west. Imperial County remained largely undeveloped with few settlers during the Spanish, Mexican, and early American Periods until water from the Colorado River was diverted to this arid basin. Irrigated agriculture was the dominant factor in the settlement and development of Imperial County.

On May 14, 1901, the Alamo Canal, which directed water from the Colorado River at Yuma into Mexico and back into California, delivered the first small flow of water to fields in the Calexico area, with larger flows starting in 1902 (O'Dell 1957:87–88; Hendricks 1971:6). The successful California Development Company named the newly reclaimed desert area Imperial Valley (Bright 1998:70; Hendricks 1971:8). By 1905, the Imperial Valley had 80 miles of canals and 700 miles of distribution canals with an estimated 67,000 irrigated acres. Soon there were 12 water districts in the Imperial Valley that obtained most of their water from the Colorado River. Ten of these districts obtained water from the California Development Company. Agricultural pursuits proved to be very profitable within the first two decades after the start of irrigation. An influx of people with the ever-growing agricultural production also spurred growth of allied industries, including beekeeping and dairy and poultry farming.

Several major floods occurred along the Colorado River and the Alamo Canal between 1904 and 1907. Breaches along the riverbank allowed the water to spill into Imperial Valley. Attempts to stop the flooding failed until early 1907 when the river was diverted back to its natural course

(O'Dell 1957:90). The series of floods left a large lake in the middle of the Salton Basin, covering an area 50 × 15 mi and encompassing 285,000 acres. This newly formed body of water was named the Salton Sea. In 1922, legislation was introduced requesting the construction of a dam at Boulder Canyon, which would prevent future large-scale flooding. Hoover Dam was completed by 1936 and the All-American Canal was constructed during the 1930s and completed in 1940.

Many vegetables, fruit, and other crops thrive in the Imperial Valley. Cotton was first grown and ginned in 1909, with 50,000 acres devoted to this crop by 1914 (McGroarty 1914:27). Alfalfa was a major crop in the Imperial Valley and although horses and mules were used for canal construction, hauling freight, and clearing land, production exceeded demand (Anderholt 1989:7). Dairy farming in the valley was one result of surplus alfalfa being too expensive to export. Dairying soon became the “greatest industry in the development of the Imperial Valley” and by the early 1920s, there were 2000 operating dairies (Anderholt 1989:53). Mining was also another major industry as Imperial County is also rich in mineral resources, including large deposits of fine clays, gypsum, and marble, among others (Morton 1977).

### 3.2.2 City of El Centro

The city of El Centro is on land originally bought by W.F. Holt and C.A. Barker in 1906. After purchasing the land, they established the town site and on April 16, 1908, the city was incorporated. By 1910, the city's population had reached 1,610, and by 1920, had tripled to 5,646 people. By the mid-1940s, the city had become the second largest in Imperial Valley with a population of 11,000. Agriculture has been paramount to El Centro's population growth and industry. Fruit and vegetable packing and shipping plants, flax fiber plants, and box factories were established in El Centro during the twentieth century. By the 1970s, Imperial County had become one of the most agriculturally productive areas in the United States. To this day, agriculture drives the economy of El Centro, though other commercial, governmental, and service industries continue to grow (City of El Centro n.d.).



## 4 BACKGROUND RESEARCH

### 4.1 CALIFORNIA HISTORICAL RESOURCE INFORMATION SYSTEM

On September 26, 2022, PaleoWest staff conducted a cultural resource records search of the California Historical Resources Information System (CHRIS) at the South Coastal Information Center (SCIC), San Diego State University. The purpose of the records search was to identify all previous cultural resource work and previously recorded cultural resources within a 0.5-mi radius of the APE (APE) (Appendix A). The CHRIS search included a review of the NRHP, CRHR, the California Points of Historical Interest list, the California Historical Landmarks list, the Archaeological Determinations of Eligibility list, and the California State Historic Resources Inventory list. The records search also included a review of available historical USGS topographic maps and General Land Office (GLO) plat maps.

#### 4.1.1 Previous Studies

The SCIC records search identified 13 cultural resources studies that were conducted within a 0.5-mi radius of the APE. None of these studies intersected the APE. A list of previous studies and their relation to the APE is included as Table 4-1.

**Table 4-1. Previous Cultural Resource Studies within a 0.5-Mi Radius of the APE**

Report Number	Author	Year	Title	Proximity to Project APE
IM-00676	El Centro Planning Department	1993	Draft Environmental Impact Report for the Proposed Tentative Map for the Desert Estates South Subdivision	0.5-mi southeast
IM-00943	Caltrans	2002	Historic Property Survey Report for Caltrans	0.20-mi north
IM-00996	Wlodarski, Robert J.	2006	Nextel Wireless Telecommunications Site CA8981A (4th Street)	0.14-mi northeast
IM-01080	Von Werlhof, Jay	1999	Archaeological Examinations of the Heber Facilities Sewer and Water Improvements Project	0.49-mi southwest
IM-01206	Price, Harry J.	2007	Results of Cultural Resources Survey for a 5.35-Acre Multifamily Project at 1650 Clark Road, El Centro, Imperial County	0.39-mi west
IM-01571	Fulton, Phil	2017	Cultural Resource Assessment Class I Inventory Verizon Wireless Services La Brucherie Facility City of El Centro, County on Imperial, California	0.5-mi northwest
IM-01705	Shultz, Richard D.	2017	Archaeological Survey Report for the Imperial Avenue Extension Project, El Centro, California	0.5-mi west
IM-01706	Shultz, Richard D.	2017	Historical Resources Evaluation Report for the Imperial Avenue Extension Project, El Centro, California	0.5-mi west
IM-01707	Wade, Sue	2017	Cultural Resource Records Search and Site Survey of the PICA024/CA-Holtville-Mainas Cell Site 330 Wake Avenue, El Centro, California 92243	0.5-mi northeast

Report Number	Author	Year	Title	Proximity to Project APE
IM-01734	Perez, Don C.	2018	Archaeological Sensitivity Assessment SD90XSB17C / 9CAB012844C Wake Avenue & South 4TH Street, El Centro, California 92243, Imperial County, EBI Project No. 6117005268, TCNS No. 162741	0.15-mi northeast
IM-01738	Ace Environmental, LLC	2017	Cultural Resource Records Search and Site Survey, Parallel Infrastructure Site PICA024, Holtville-Mainas, 330 Wake Avenue, El Centro, Imperial County, California 92243	0.5-mi northeast
IM-01775	Shultz, Richard D.	2018	Historic Properties Survey Report and Finding of Effect for the Imperial Avenue Extension Project in Imperial County, California	0.5-mi west
IM-01776	Shultz, Richard D.	2017	Finding of No Adverse Effect for the Imperial Avenue Extension Project, El Centro, California	0.5-mi west

#### 4.1.2 Previously Recorded Resources

Two cultural resources are recorded within 0.5-mi of the APE. One resource is a segment of the Date Drain, which is part of the Imperial Irrigation District (IID) (P-13-008655). The other resource is a historic period head gate and a section of an open irrigation canal (P-13-012256) (Table 3-2). No resources have been documented within or adjacent to the APE.

**Table 4-2. Previously Recorded Cultural Resources within a 0.5-Mi Radius of the APE**

Primary Number	Trinomial	Description	NRHP/CRHR Eligibility Status	Recorded Year	Relationship to Project APE
P-13-008655	–	A historic period segment of the Date Drain, which is a part of the IID	Code 6Y (Determined ineligible for NRHP by consensus through Section 106 process)	2001 (Caltrans)	0.20-mi north
P-13-012256	–	A historic period head gate and portion of open irrigation canal	Unevaluated	2008 (RECON)	0.50-mi southeast

Source: SCIC, November 2022

## 4.2 HISTORIC AERIAL PHOTOGRAPHS AND MAPS

A review of historical aerial photographs available on Google Earth and HistoricAerials.com indicates that from at least 1953 until the present time, the APE has been used for agricultural purposes. The closest freshwater source to the APE is the New River, approximately 4.4 mi southwest of the APE. Between 1953 and 1984, a motel building was constructed along the northeastern boundary of the APE, which still stands today. Between 1986 and 1994, the area along the northwestern boundary of the APE was graded and paved. The southeastern and southwestern boundaries of the APE began to see residential development between 1986 and 1994. Residential development continued through the late 1990s with 6<sup>th</sup> Street, Spear Avenue, and Miraflores Way constructed immediately adjacent to the APE by 2002. A multi-story apartment complex was built west of the APE between 2005 and 2009.

## 4.3 NATIVE AMERICAN OUTREACH

PaleoWest requested a review of the Native American Heritage Commission's (NAHC) Sacred Lands File (SLF) on November 3, 2022. In anticipation of the results from the SLF, PaleoWest sent letters to a list of contacts, based on prior projects in the immediate area, on November 3, 2022. As of November 16, 2022, nine responses have been received from contacts. A summary of the Native American outreach is provided in Appendix B.

The Quechan Historic Preservation Office responded by email on November 3, 2022. The email stated that the tribe did not wish to provide PaleoWest with comments on this Project.

Ray Teran of the Viejas Band of Kumeyaay Indians responded via email on November 3, 2022. Mr. Teran stated that he has reviewed the proposed Project and determined that the Project site has cultural significance or ties to Viejas. He noted that cultural resources have been located within or adjacent to the APE. Viejas Band request that a Kumeyaay Cultural Monitor be on site for ground disturbing activities and requested that the tribe be informed of any inadvertent discovery of cultural artifacts, cremation sites, or human remains.

Justin Brundin, Cultural Resources Manager of Cocopah Indian Reservation, responded via phone on November 16, 2022. He stated that the tribe does not have any comments about this Project as it is located in a farm field.

A receptionist in the tribal office of the Lipay Nation of Santa Ysabel replied via phone on November 16, 2022. She stated that Chairperson Paipa usually returns any comment she has on a Project in an email. She advised that if PaleoWest did not receive a response then the tribe probably does not have any comments.

Lisa Contreras, Vice Chairperson of the Inaja-Cosmit Tribal Band, replied via phone on November 16, 2022. She stated that the tribe had no questions, comments, or concerns due to the Project's geographical location in relation to tribal lands.

Lisa Cumper, Tribal Historic Preservation Officer of the Jamul Indian Village, responded via email on November 16, 2022. She noted that a review of the tribe's records indicates that had no information to provide.

Carmen Lucas of the Kwaaymii Laguna Band of Mission Indians replied via phone on November 16, 2022. She stated a well-qualified tribal monitor should be present during construction.

A receptionist in the tribal office of Chairperson Parada of the La Posta Band of Diegueno Mission Indians responded via phone on November 16, 2022. He stated he would send Chairperson Parada a message about the email we sent. If PaleoWest did not receive a reply from Chairperson Parada, then we may conclude that the tribe has no comments about this Project.

On November 16, 2022, a receptionist in the tribal office of Chairperson Theresa Hernandez of the Mesa Grande Band of Diegueno Mission Indians noted that Chairperson Hernandez had been informed about PaleoWest's outreach efforts. The receptionist noted that the Chairperson would respond with any questions or comments directly. PaleoWest has received no comments from Chairperson Hernandez.

As of November 16, 2022, PaleoWest has not received any additional responses to the Native American scoping letters or email.

## 5 FIELDWORK

### 5.1 SURVEY METHODS

PaleoWest Associate Archaeologist, Paige Kohler, conducted a pedestrian survey of the APE on November 8, 2022. Kohler surveyed the APE using transects spaced 5–10 m apart and generally oriented in a north-south direction. The entire 12-acre area of the APE was surveyed during the fieldwork effort.

Kohler examined all exposed ground surface for artifacts (e.g., flaked stone tools and tool-manufacture debris, ground stone tools, ceramic sherds, fire-altered rock), ecofacts (marine shell, bone), soil discoloration that could indicate the presence of a cultural midden, soil depressions, and features indicative of the former presence of structures or buildings (e.g., standing exterior walls, postholes, foundations) or historic period debris (e.g., metal, glass, ceramic sherds, cut bone). Ground disturbances, such as burrows, were visually inspected. Photographs documenting the APE are maintained by PaleoWest in online cloud storage.

### 5.2 RESULTS

Results of the survey indicate that the APE consists of fallowed agricultural fields with no noted development. Visibility was generally excellent (80-90%), though small portions of the ground surface were obscured by shrubs and modern refuse. In addition to evidence of discing and plowing from past agricultural use, other noted disturbances include concentrations of modern trash, construction debris, and a homeless encampment (Figure 5-1 through Figure 5-6). No prehistoric or historic cultural resources were identified in the APE.



Figure 5-1. Southwest corner of APE, facing east.



Figure 5-2. View from the center of the southern boundary of the APE, facing east-southeast.



Figure 5-3. Center of northern boundary of APE containing trash debris, facing northwest.



Figure 5-4. Homeless encampment, facing east.



Figure 5-5. Motel building along northeast boundary of APE, facing northeast.



Figure 5-6. View from southwest corner of APE, facing northeast.

## 6 SUMMARY AND RECOMMENDATIONS

### 6.1 SUMMARY OF RESULTS

This cultural resource assessment included a cultural resources records search, Native American outreach, and an intensive pedestrian survey of the APE. No cultural resources were identified in the APE during these efforts. Due to the paucity of available freshwater sources in the vicinity and the absence of known prehistoric archaeological sites in the immediate area, the sensitivity of the APE for containing intact buried prehistoric archaeological resources is considered low. Furthermore, an examination of historic topographic maps and aerial images indicates that the APE has largely been used for agricultural purposes. Due to the lack of intensive development of the APE during the historic period, the potential to encounter buried historic period archaeological resources during Project construction is relatively low.

Based on these results, PaleoWest recommends a finding of no historic properties affected under Section 106. However, PaleoWest recommends the following best management practices be implemented during Project construction.

- If cultural resources are encountered during Project related activities, work in the immediate area must halt and the Project Archaeologist should be contacted immediately to evaluate the find. If the discovery proves to be significant for listing on the California Register of Historical Resources and/or the National Register of Historic Places, additional work such as data recovery excavations may be warranted to mitigate any impacts per CEQA or adverse effects under Section 106.
- If human remains are found, existing regulations outlined in the State of California Health and Safety Code Section 7050.5 state that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code § 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner must be notified within 24 hours of positive identification as human. If the human remains are determined to be prehistoric, the Coroner will notify the NAHC, which will determine and notify a most likely descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of being granted access and provide recommendations as to the treatment of the remains to the landowner.



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# Appendix A. Record Search Summary

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South Coastal Information Center  
San Diego State University  
5500 Campanile Drive  
San Diego, CA 92182-5320  
Office: (619) 594-5682  
www.scic.org  
scic@mail.sdsu.edu

## CALIFORNIA HISTORICAL RESOURCES INFORMATION SYSTEM CLIENT IN-HOUSE RECORDS SEARCH

**Company:** Paleowest  
**Company Representative:** Paige Kohler  
**Date:** 11/9/2022  
**Project Identification:** 22-0436 Tasks 037 thru 041  
**Search Radius:** 1/4 mile

**Historical Resources:** SELF  
Trinomial and Primary site maps have been reviewed. All sites within the project boundaries and the specified radius of the project area have been plotted. Copies of the site record forms have been included for all recorded sites.

**Previous Survey Report Boundaries:** SELF  
Project boundary maps have been reviewed. National Archaeological Database (NADB) citations for reports within the project boundaries and within the specified radius of the project area have been included.

**Historic Addresses:** SELF  
A map and database of historic properties (formerly Geofinder) has been included.

**Historic Maps:** SELF  
The historic maps on file at the South Coastal Information Center have been reviewed, and copies have been included.

**Copies:** 207

**Hours:** 1.5

Excel Lines = 47 Lines

# **Appendix B. Native American Outreach**

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Native American Contact/Response Matrix				
Recommended Contacts (Name and Tribal Affiliation)	Contact Info	Initial Contact	Follow up Attempts	Comments/Notes
Raymond Welch, Chairperson Barona Group of the Capitan Grande 1095 Barona Road Lakeside, CA 92040	Phone: (619) 443-6612 Fax: (619) 443-0681 rwelch@barona-nsn.gov	Sent email on 11/2/22	Spoke with assistant on 11/16/22	Spoke with assistant to Chairperson Welch via phone on 11/16/22. She stated that all emails and letters are forwarded to the Tribe's in-house council for review. The attorney who heads the in-house council is named Art Bunce, who can be reached at buncelaw@aol.com. He only comments if there is an issue with a project.
Marcus Cuero, Chairman Campo Band of Diegueno Mission Indians 36190 Church Road, Suite 1 Campo, CA, 91906	Phone: (619) 478 - 9046 Fax: (619) 478-5818 mCuero@campo-nsn.gov	Sent USPS on 11/2/22	Left voicemail on 11/16/22	Received error message on email. Sent USPS.
Justin Brundin, Cultural Resources Manager Cocopah Indian Reservation 14515 S. Veterans Drive Somerton, AZ 85350	Phone: (928) 627-4849 Fax: (928) 627-3173 brundinj@cocopah.com	Sent email on 11/2/22	Spoke with JB on 11/16/22	Spoke with Justin Brundin, Cultural Resources Manager, on 11/16/22. Mr. Brundin stated that, "At this time, the Tribe does not have any comments about this project, given that the Project is located in a farm field."
Robert Pinto, Chairperson Ewiiapaayp Band of Kumeyaay Indians 4054 Willows Road Alpine, CA, 91901	Phone: (619) 933 - 2200 Fax: (619) 445-9126 ceo@ebki-nsn.gov	Sent email on 11/2/22	N/A	None.
Michael Garcia, Vice Chairperson Ewiiapaayp Band of Kumeyaay Indians 4054 Willows Road Alpine, CA, 91901	Phone: (619) 933 - 2200 Fax: (619) 445-9126 michaelg@leaningrock.net	Sent email on 11/2/22	N/A	Vice Chairperson Michael Garcia has repeatedly advised that "the Ewiiapaayp Band does not ordinarily involve themselves in Projects outside of the reservation."
Bernice Paipa, Chairperson Iipay Nation of Santa Ysabel, California PO Box 130 Santa Ysabel, CA 92070-0130	Phone: (760) 765-0845 Fax: (760) 765-0320 bpaipa@iipaynation-nsn.gov	Sent email on 11/2/22	Spoke with receptionist in tribal office on 11/16/22	Spoke with receptionist in tribal office on 11/16/22, when she stated that Chairperson Paipa usually returns any comments she on a Project in an email. If you have not received one, she probably does not have any comments.
Rebecca Osuna, Chairperson Inaja-Cosmit Band of Indians 2005 S. Escondido Blvd. Escondido, CA 92025	Phone: (760) 737-7628 Fax: (760) 747-8568 Inaja_cosmitrez@hotmail.com	Sent email on 11/2/22	Spoke with VP Lisa Contreras on 11/16/22	Spoke to Vice Chairperson Lisa Contreras on 11/16/22. Ms. Contreras stated that, "The Inaja-Cosmit Tribal band has no questions, comments, or concerns due to the Project's geographical location to their Tribal lands."
Erica Pinto, Chairperson Jamul Indian Village PO Box 612 Jamul, CA 91935	Phone: (619) 669-4785 Fax: (619) 669-4817 epinto@jiv-nsn.gov	Sent email on 11/2/22	N/A	None.
Lisa Cumper, Tribal Historic Preservation Officer Jamul Indian Village PO Box 612 Jamul, CA 91935	Phone: (619) 669-4855 lcumper@jiv-nsn.gov	Sent email on 11/2/22	N/A	Received response from Lisa Cumper via email on 11/16/22. Response stated that "I've reviewed our records and we can conclude consultation for this project. Nothing further for JIV at this time."
Carmen Lucas Kwaaymii Laguna Band of Mission Indians P.O. Box 775 Pine Valley, CA 91962	Phone: (619) 709-4207	Sent USPS on 11/2/22	Spoke with CL on 11/16/22	Spoke with Carmen Lucas on 11/16/22 and she stated that "I always advise that if there is a requirement for a well-qualified archaeologist being present on a Project, there should also be a requirement for a well-qualified tribal monitor. Other than that, I do not have any comments unless something comes up."
Gwendolyn Parada, Chairperson La Posta Band of Diegueno Mission Indians 6 Crestwood Road Boulevard, CA, 91905	Phone: (619) 478 - 2113 Fax: (619) 478-2125 LP13boots@aol.com	Sent email on 11/2/22	Spoke with receptionist in tribal office on 11/16/22	Spoke with a receptionist in Chairperson Parada's office on 11/16/22 who stated that he would send Chairperson Parada a message about the email we sent, and if we do not hear anything from her, this means that the Tribe has no comments about the Project.
Javaughn Miller, Tribal Administrator La Posta Band of Diegueno Mission Indians Crestwood Road Boulevard, CA, 91905	Phone: (619) 478 - 2113 Fax: (619) 478-2125 jmillier@LPtribe.net	Sent USPS on 11/2/22	Spoke with receptionist in tribal office on 11/16/22	Received error message on email. Sent USPS.
Angela Elliott Santos, Chairperson Manzanita Band of Kumeyaay Nation P.O. Box 1302 Boulevard, CA, 91905	Phone: (619) 766 - 4930 Fax: (619) 766-4957 ljbirdsinger@aol.com	Sent email on 11/2/22	Left voicemail on 11/16/22	None.

**Native American Contact/Response Matrix**

Recommended Contacts (Name and Tribal Affiliation)	Contact Info	Initial Contact	Follow up Attempts	Comments/Notes
Lisa Haws, THPO Band of Kumeyaay Nation Box 1302 Boulevard, CA, 91905 Manzanita P.O.	Phone: (619) 766 - 4930 Fax: (619) 766-4957 lisahaws@msn.com	Sent email on 11/2/22	Left voicemail on 11/16/22	None.
Theresa Hernandez, Chairperson Mesa Grande Band of Diegueno Mission Indians P.O. Box 270 Santa Ysabel, CA, 92070	Phone: (760) 782 - 3818 Fax: (760) 782-9092 theresa@mesagrande-nsn.gov	Sent email on 11/2/22	Spoke with receptionist in tribal office on 11/16/22	Receptionist in tribal office let us know that Chairperson Hernandez has been informed about the emails we are sending about various projects and that she can respond with comments or questions. She is currently out in the field and it may take longer to receive responses.
Jill McCormick, Historic Preservation Officer Quechan Tribe of the Fort Yuma Reservation P.O. Box 1899 Yuma, AZ, 85366	Phone: (760) 572 - 2423 historicpreservation@quechantribe.com	Sent email on 11/2/22	N/A	Quechan Historic Preservation responded via email on 11/3/22, stating that "we do not wish to provide Paleowest with comments on this project."
Steven Cope, Spokesperson San Pasqual Band of Diegueno Mission Indians P.O. Box 365 Valley Center, CA 92082	Phone: (760) 749-3200 Fax: (760) 749-3876 stevenc@sanpasqualtribe.org	Sent email on 11/2/22	Spoke with receptionist in tribal office on 11/16/22	Receptionist in tribal office took message on 11/16/22 and stated that she will relay the information to Spokesperson Cope when he returns to the office.
Jamie Lebrake and Charlene Elliott, Kumeyaay Resource Specialists Sycuan Band of the Kumeyaay Nation 1 Kwaaypaay Court El Cajon, CA 92019	Phone: (619) 445-6917 cworrell@sycuan-nsn.gov	Sent email on 11/2/22	Left voicemail on 11/16/22	None.
Ray Teran Band of Kumeyaay Indians 1 Viejas Grade Road Alpine, CA 91901 Viejas	Phone: (619) 445-3810 rteran@viejas-nsn.gov	Sent email on 11/2/22	N/A	Ray Teran of Viejas Band of Kumeyaay Indians responded via email on 11/2/22, stating that, "The Viejas Band of Kumeyaay Indians ("Viejas") has reviewed the proposed project and at this time we have determined that the project site has cultural significance or ties to Viejas. Cultural resources have been located within or adjacent to the APE-DE of the proposed project. Viejas Band request that a Kumeyaay Cultural Monitor be on site for ground disturbing activities and to inform us of any new developments such as inadvertent discovery of cultural artifacts, cremation sites, or human remains. If you wish to utilize Viejas cultural monitors (Viejas rate is \$54.15/hr. plus GSA mileage), please call Ernest Pingleton at 619-655-0410 or email, epingleton@viejasnsn.gov, for contracting and scheduling. Thank you. If a Tribe, having a closer proximity to the Project, requests to perform cultural monitoring, Viejas will defer to them."
Ernest Pingleton, Tribal Historic Officer Viejas Band of Kumeyaay Indians 1 Viejas Grade Road Alpine, CA 91901	Phone: (619) 659-2314 epingleton@viejas-nsn.gov	Sent email on 11/2/22	N/A	None.



T: 619.210.0199  
F: 602.254.6280  
info@paleowest.com

SAN DIEGO, CALIFORNIA  
3990 Old Town Avenue, Suite A105  
San Diego, CA 92110

3 November 2022

Justin Brundin, Cultural Resources Manager  
Cocopah Indian Reservation  
14515 S. Veterans Drive  
Sommerton, AZ 85350  
Transmitted via email to [brundinj@cocopah.com](mailto:brundinj@cocopah.com)

**Re:** Cultural Resource Study for the 6<sup>th</sup> at Spears Apts El Centro Project, in El Centro, Imperial County, California

Dear Mr. Brundin,

On behalf of Birdseye Planning Group (BPG), PaleoWest is conducting a cultural resource study for the proposed 6<sup>th</sup> at Spears Apts El Centro Project (Project) located at the northeast corner of 6<sup>th</sup> Street and Spears Avenue, in El Centro, Imperial County, California. The cultural resource investigation is being conducted in compliance with the California Environmental Quality Act (CEQA). Because the Project may seek federal funding assistance, the cultural resources study will also be prepared for compliance with Section 106 of the National Historic Preservation Act (Section 106).

The proposed Project includes the development of approximately 12-acres for 288 affordable housing units. The Project area is located on the El Centro, California. 7.5' USGS quadrangle map, within Township 16 South, Range 14 East, Sections 7-8, and 17-18.

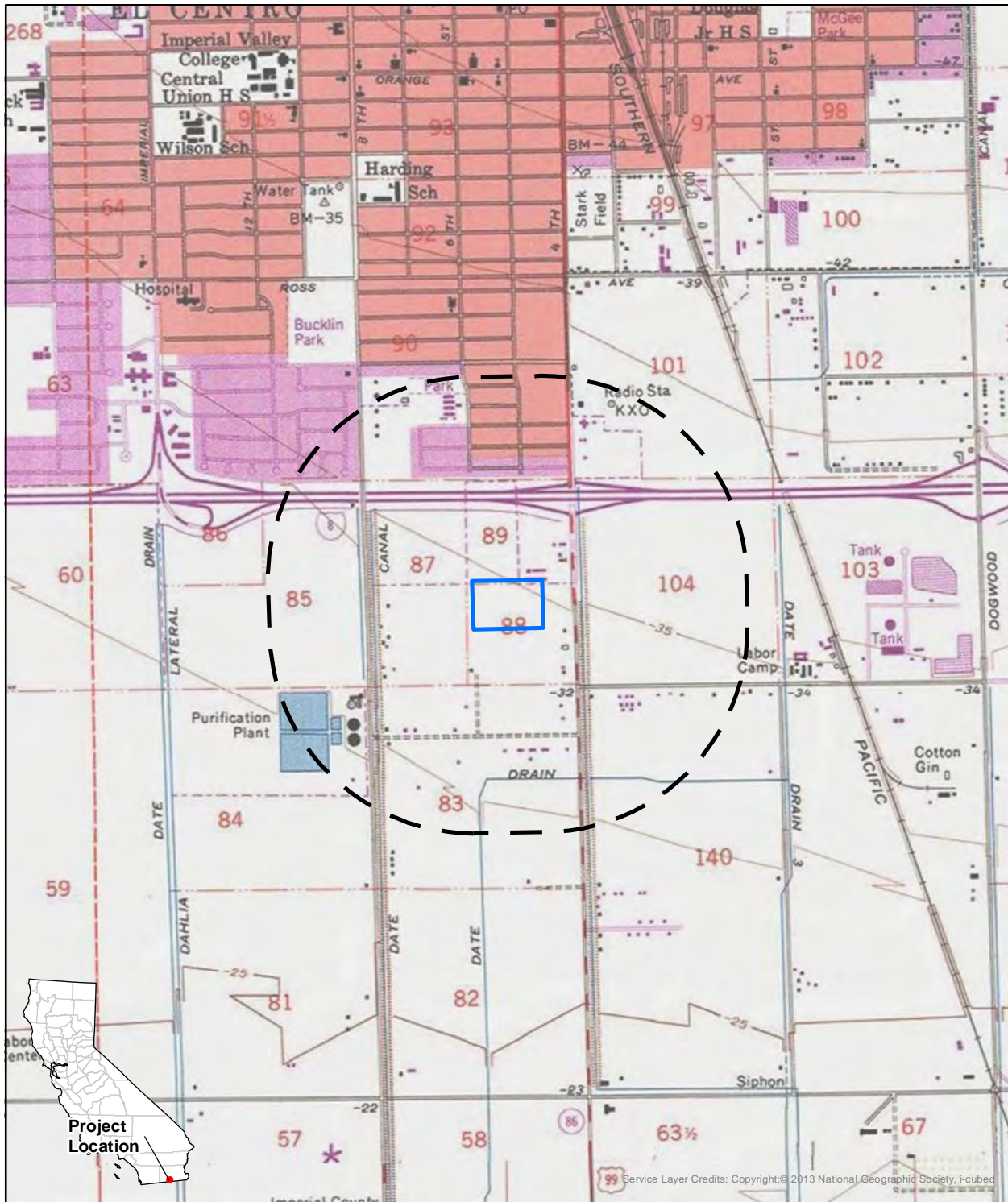
A cultural resource literature review and records search from the South Coastal Information Center (SCIC) at San Diego State University is scheduled for the coming week.

As part of the cultural resource investigation of the Project area, PaleoWest requested a search of the Native American Heritage Commission's (NAHC's) Sacred Lands File. The NAHC's response is still pending, but we anticipate that the NAHC will recommend that we contact you. Should your records show that cultural resources exist within or near the Project area shown on the enclosed map, please contact me at (805) 588-4186 or at [pkohler@paleowest.com](mailto:pkohler@paleowest.com).

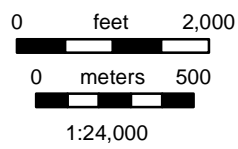
Kind Regards,

Paige Kohler | Associate Archaeologist  
PALEOWEST







Service Layer Credits: Copyright © 2013 National Geographic Society, I-cubed



**USGS 7.5' Quadrangle:**  
**El Centro, Ca (1980)**  
**T16S 14E, Secs 7-8 & 17-18**  
**UTM Zone 11, NAD 83**  
**SBBM**

 Project Area  
 0.5 mi buffer



T: 619.210.0199  
F: 602.254.6280  
info@paleowest.com

SAN DIEGO, CALIFORNIA  
3990 Old Town Avenue, Suite A105  
San Diego, CA 92110

3 November 2022

Steven Cope, Spokesperson  
San Pasqual Band of Diegueno Mission Indians  
PO Box 365  
Valley Center, CA 92082  
Transmitted via email to stevenc@sanpasqualtribe.org

**Re:** Cultural Resource Study for the 6<sup>th</sup> at Spears Apts El Centro Project, in El Centro, Imperial County, California

Dear Spokersperson Cope,

On behalf of Birdseye Planning Group (BPG), PaleoWest is conducting a cultural resource study for the proposed 6<sup>th</sup> at Spears Apts El Centro Project (Project) located at the northeast corner of 6<sup>th</sup> Street and Spears Avenue, in El Centro, Imperial County, California. The cultural resource investigation is being conducted in compliance with the California Environmental Quality Act (CEQA). Because the Project may seek federal funding assistance, the cultural resources study will also be prepared for compliance with Section 106 of the National Historic Preservation Act (Section 106).

The proposed Project includes the development of approximately 12-acres for 288 affordable housing units. The Project area is located on the El Centro, California. 7.5' USGS quadrangle map, within Township 16 South, Range 14 East, Sections 7-8, and 17-18.

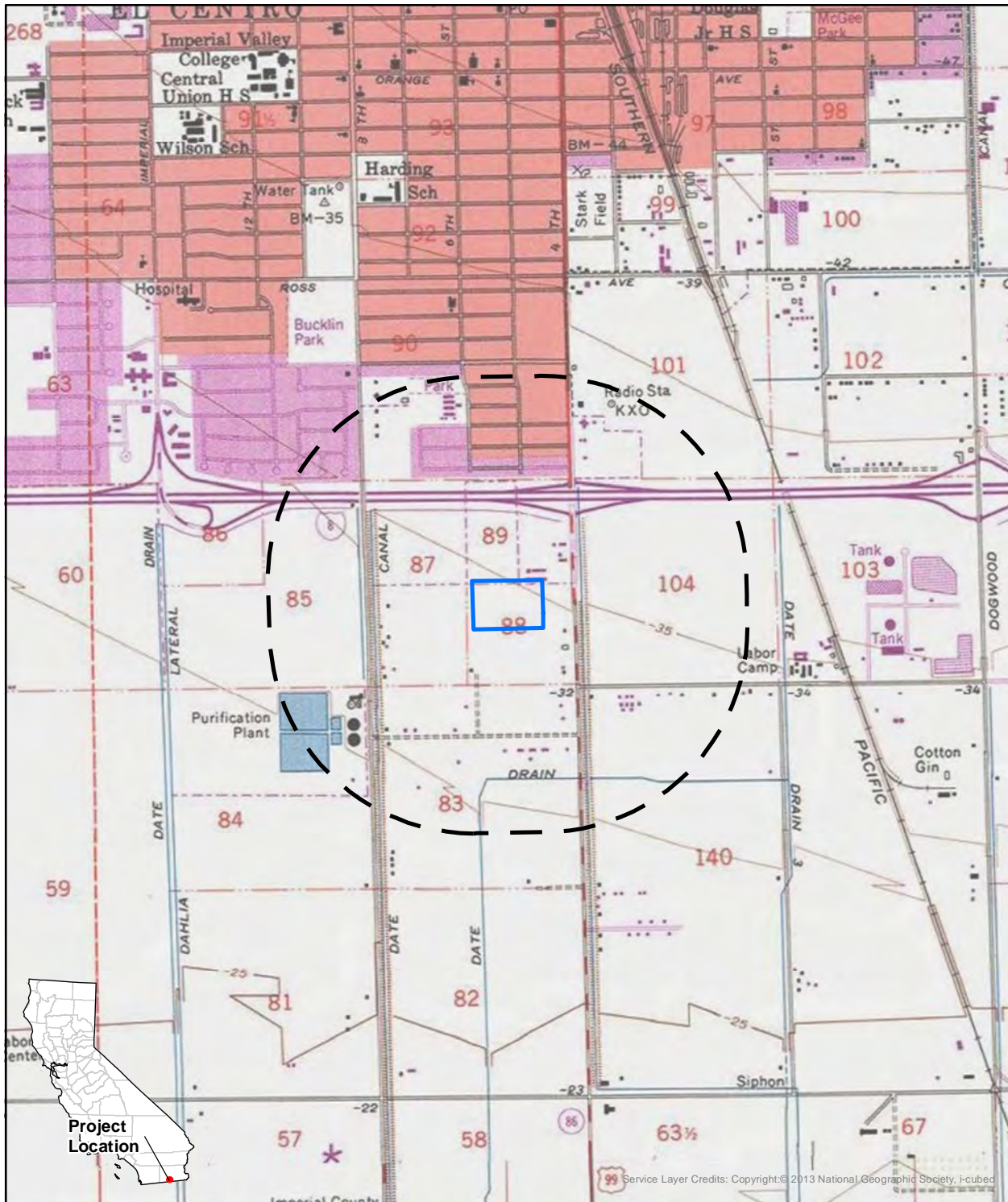
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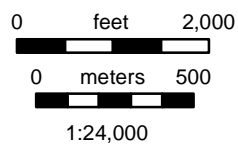
Kind Regards,

Paige Kohler | Associate Archaeologist  
PALEOWEST







Service Layer Credits: Copyright © 2013 National Geographic Society, I-cubed



**USGS 7.5' Quadrangle:**  
**El Centro, Ca (1980)**  
**T16S 14E, Secs 7-8 & 17-18**  
**UTM Zone 11, NAD 83**  
**SBBM**

 Project Area  
 0.5 mi buffer



T: 619.210.0199  
F: 602.254.6280  
info@paleowest.com

SAN DIEGO, CALIFORNIA  
3990 Old Town Avenue, Suite A105  
San Diego, CA 92110

3 November 2022

Marcus Cuero, Chairman  
Campo Band of the Diegueno Mission Indians  
36190 Church Road, Suite 1  
Campo, CA 91906  
Transmitted via email to mcuero@campo-nsn.gov

**Re:** Cultural Resource Study for the 6<sup>th</sup> at Spears Apts El Centro Project, in El Centro, Imperial County, California

Dear Chairman Cuero,

On behalf of Birdseye Planning Group (BPG), PaleoWest is conducting a cultural resource study for the proposed 6<sup>th</sup> at Spears Apts El Centro Project (Project) located at the northeast corner of 6<sup>th</sup> Street and Spears Avenue, in El Centro, Imperial County, California. The cultural resource investigation is being conducted in compliance with the California Environmental Quality Act (CEQA). Because the Project may seek federal funding assistance, the cultural resources study will also be prepared for compliance with Section 106 of the National Historic Preservation Act (Section 106).

The proposed Project includes the development of approximately 12-acres for 288 affordable housing units. The Project area is located on the El Centro, California. 7.5' USGS quadrangle map, within Township 16 South, Range 14 East, Sections 7-8, and 17-18.

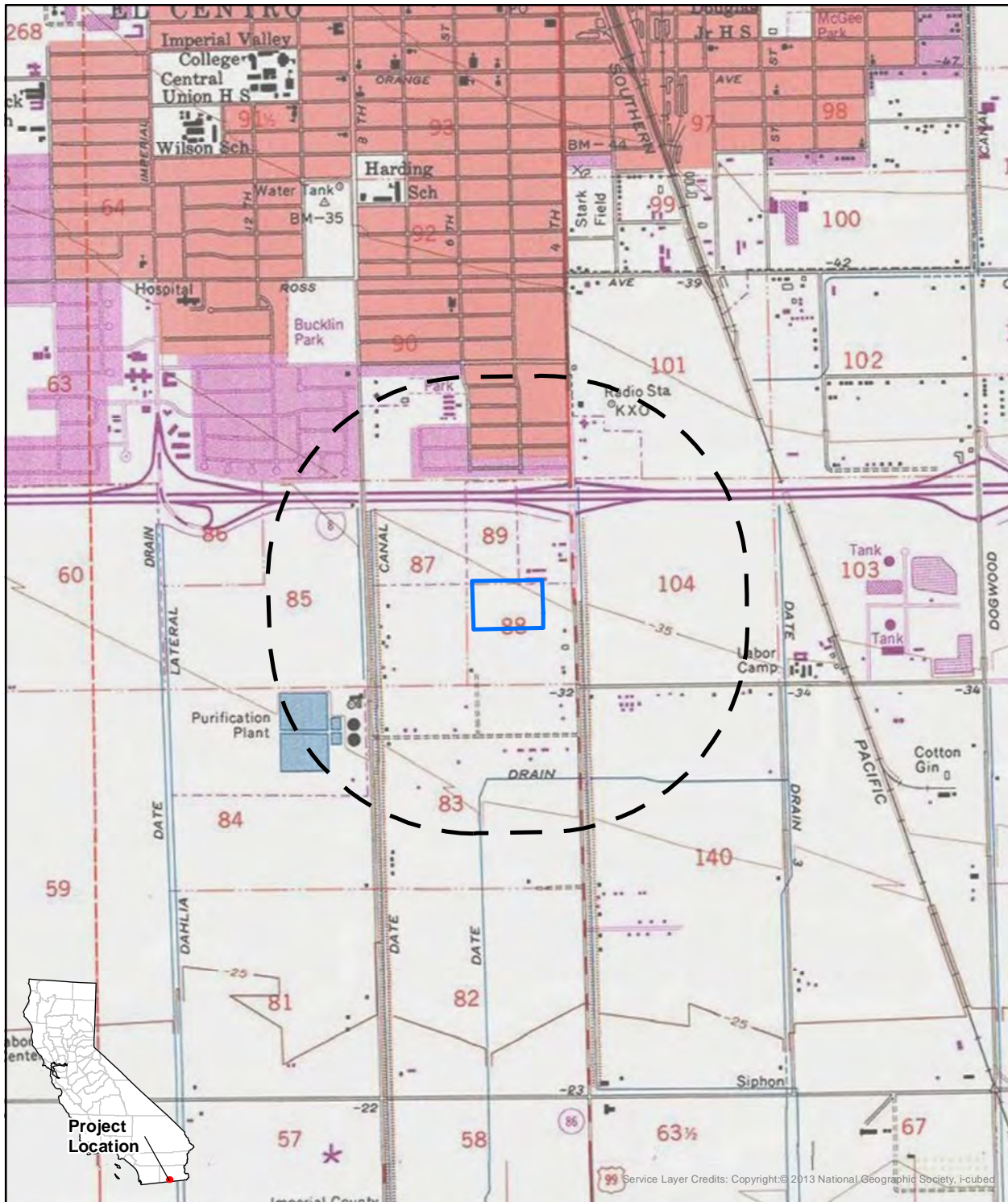
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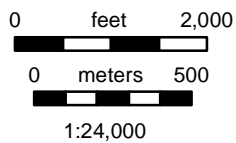
Kind Regards,

Paige Kohler | Associate Archaeologist  
PALEOWEST







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**USGS 7.5' Quadrangle:**  
**El Centro, Ca (1980)**  
**T16S 14E, Secs 7-8 & 17-18**  
**UTM Zone 11, NAD 83**  
**SBBM**

 Project Area  
 0.5 mi buffer





T: 619.210.0199  
F: 602.254.6280  
info@paleowest.com

SAN DIEGO, CALIFORNIA  
3990 Old Town Avenue, Suite A105  
San Diego, CA 92110

3 November 2022

Lisa Cumper, Tribal Historic Preservation Officer  
Jamul Indian Village  
PO Box 612  
Jamul, CA 91935  
Transmitted via email to lcumper@jiv-nsn.gov

**Re:** Cultural Resource Study for the 6<sup>th</sup> at Spears Apts El Centro Project, in El Centro, Imperial County, California

Dear Ms. Cumper,

On behalf of Birdseye Planning Group (BPG), PaleoWest is conducting a cultural resource study for the proposed 6<sup>th</sup> at Spears Apts El Centro Project (Project) located at the northeast corner of 6<sup>th</sup> Street and Spears Avenue, in El Centro, Imperial County, California. The cultural resource investigation is being conducted in compliance with the California Environmental Quality Act (CEQA). Because the Project may seek federal funding assistance, the cultural resources study will also be prepared for compliance with Section 106 of the National Historic Preservation Act (Section 106).

The proposed Project includes the development of approximately 12-acres for 288 affordable housing units. The Project area is located on the El Centro, California. 7.5' USGS quadrangle map, within Township 16 South, Range 14 East, Sections 7-8, and 17-18.

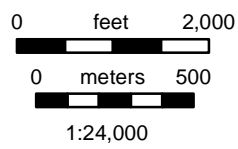
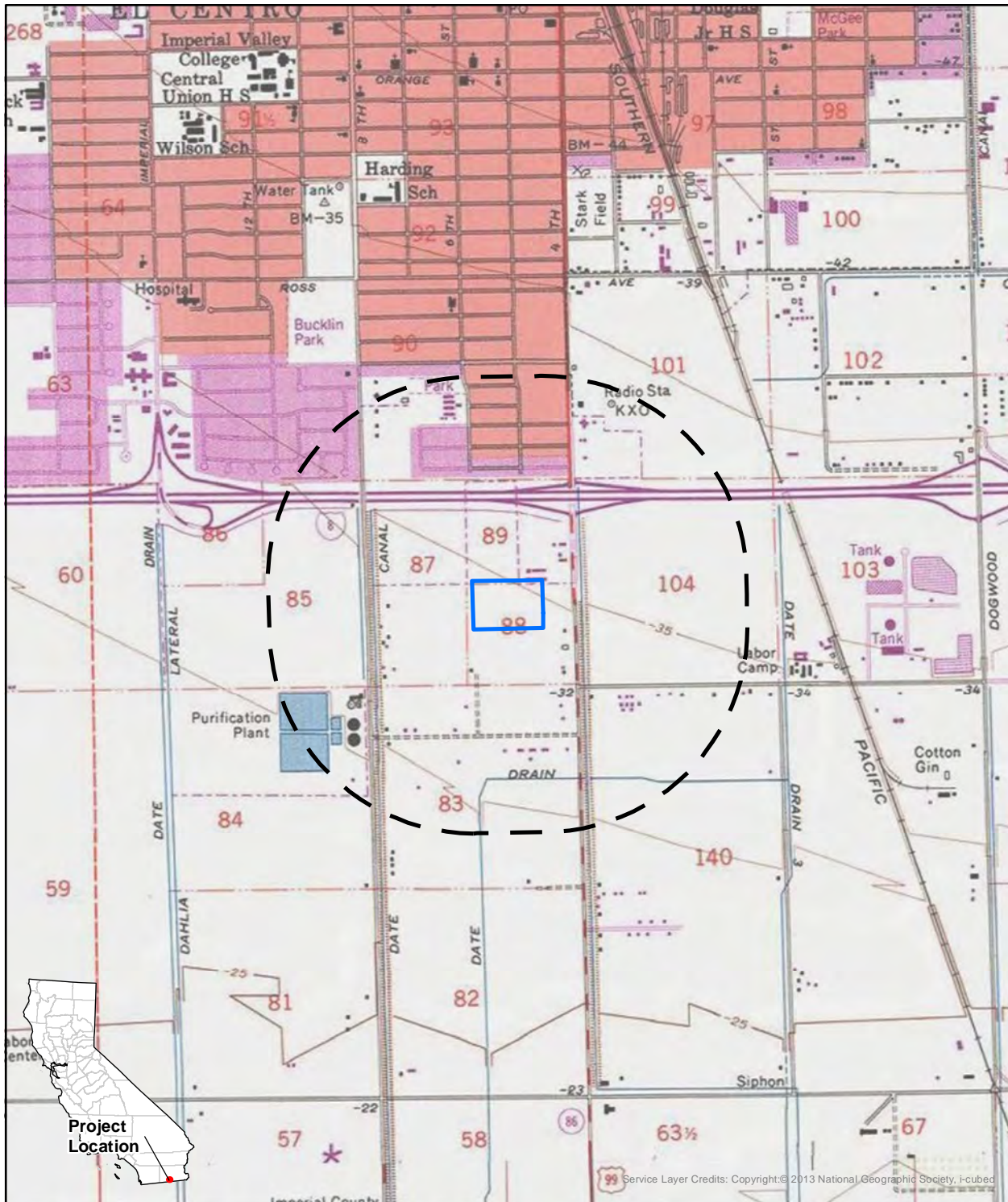
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Kind Regards,

Paige Kohler | Associate Archaeologist  
PALEOWEST





**USGS 7.5' Quadrangle:**  
**El Centro, Ca (1980)**  
**T16S 14E, Secs 7-8 & 17-18**  
**UTM Zone 11, NAD 83**  
**SBBM**

 Project Area  
 0.5 mi buffer

Service Layer Credits: Copyright © 2013 National Geographic Society, I-cubed



T: 619.210.0199  
F: 602.254.6280  
info@paleowest.com

SAN DIEGO, CALIFORNIA  
3990 Old Town Avenue, Suite A105  
San Diego, CA 92110

3 November 2022

Michael Garcia, Vice Chairperson  
Ewiiapaayp Band of Kumeyaay Indians  
4054 Willows Road  
Alpine, CA 91901  
Transmitted via email to michaelg@leaningrock.net

**Re:** Cultural Resource Study for the 6<sup>th</sup> at Spears Apts El Centro Project, in El Centro, Imperial County, California

Dear Vice Chairperson Garcia,

On behalf of Birdseye Planning Group (BPG), PaleoWest is conducting a cultural resource study for the proposed 6<sup>th</sup> at Spears Apts El Centro Project (Project) located at the northeast corner of 6<sup>th</sup> Street and Spears Avenue, in El Centro, Imperial County, California. The cultural resource investigation is being conducted in compliance with the California Environmental Quality Act (CEQA). Because the Project may seek federal funding assistance, the cultural resources study will also be prepared for compliance with Section 106 of the National Historic Preservation Act (Section 106).

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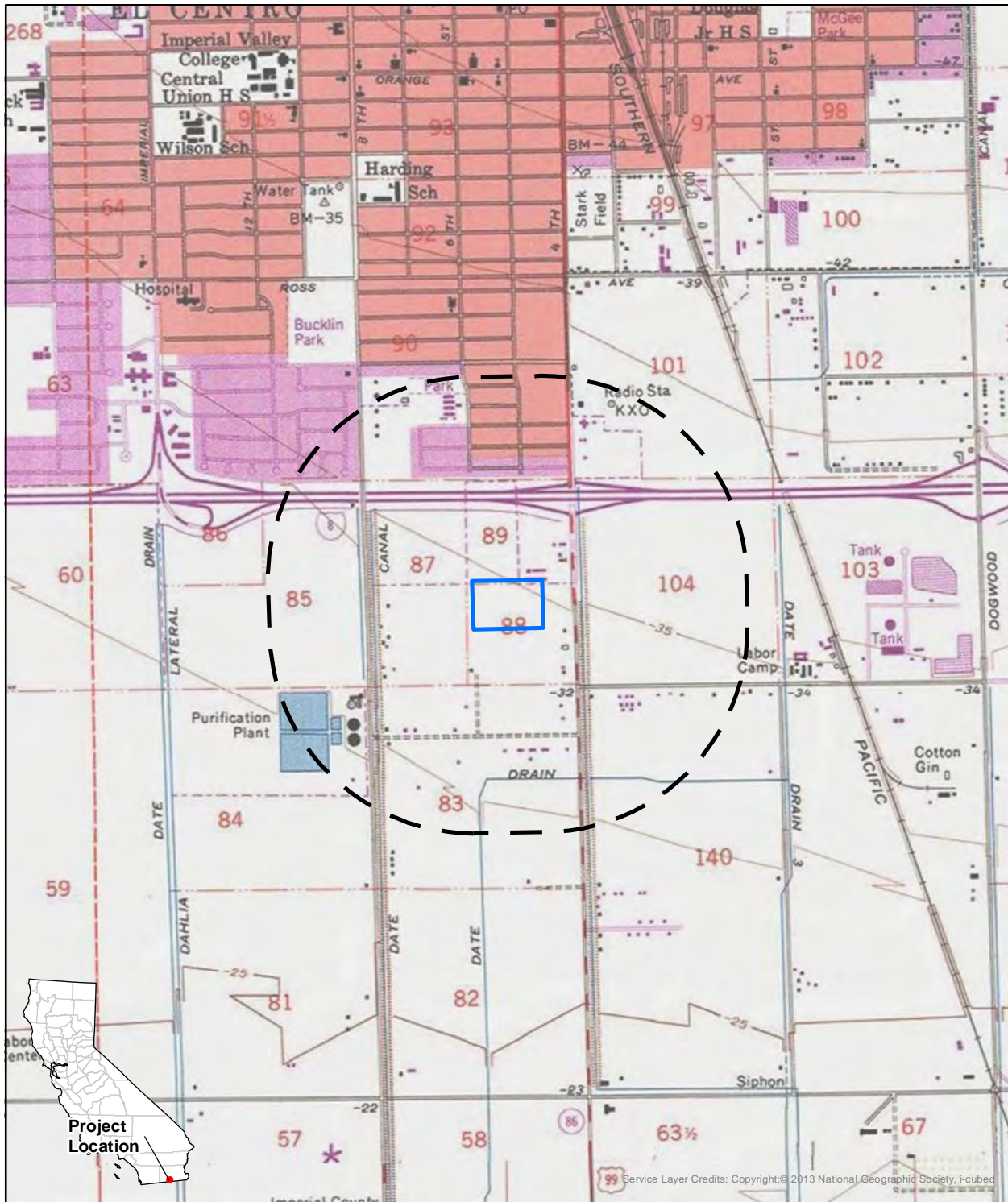
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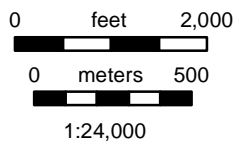
Paige Kohler | Associate Archaeologist  
PALEOWEST







Project Location

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**SBBM**

 Project Area  
 0.5 mi buffer



T: 619.210.0199  
F: 602.254.6280  
info@paleowest.com

SAN DIEGO, CALIFORNIA  
3990 Old Town Avenue, Suite A105  
San Diego, CA 92110

3 November 2022

Lisa Haws, THPO  
Manzanita Band of Kumeyaay Indians  
PO Box 1302  
Boulevard, CA 91905  
Transmitted via email to lhaws@msn.com

**Re:** Cultural Resource Study for the 6<sup>th</sup> at Spears Apts El Centro Project, in El Centro, Imperial County, California

Dear Ms. Haws,

On behalf of Birdseye Planning Group (BPG), PaleoWest is conducting a cultural resource study for the proposed 6<sup>th</sup> at Spears Apts El Centro Project (Project) located at the northeast corner of 6<sup>th</sup> Street and Spears Avenue, in El Centro, Imperial County, California. The cultural resource investigation is being conducted in compliance with the California Environmental Quality Act (CEQA). Because the Project may seek federal funding assistance, the cultural resources study will also be prepared for compliance with Section 106 of the National Historic Preservation Act (Section 106).

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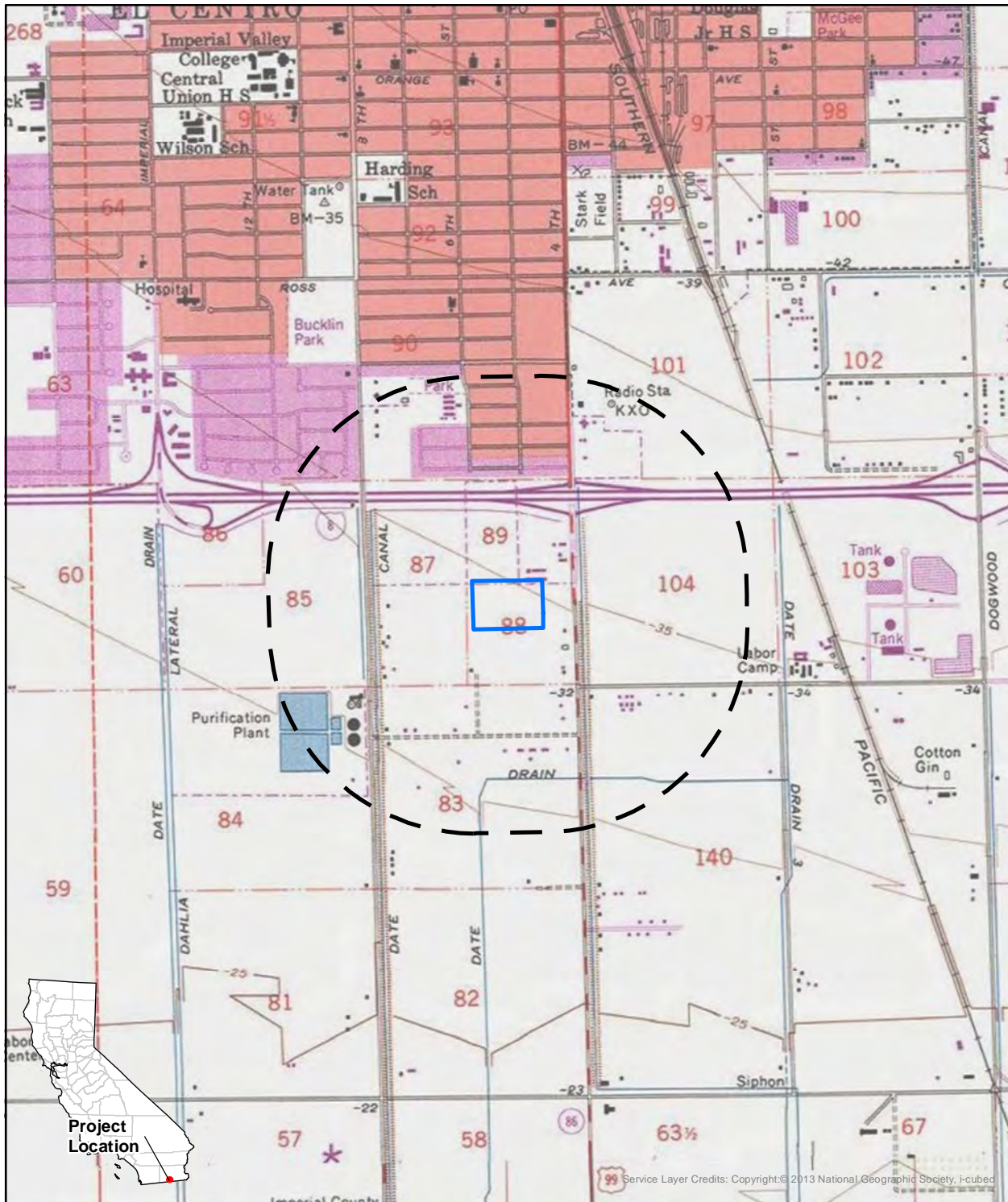
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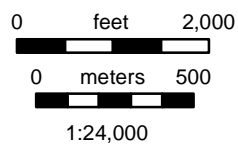
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Paige Kohler | Associate Archaeologist  
PALEOWEST







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T: 619.210.0199  
F: 602.254.6280  
info@paleowest.com

SAN DIEGO, CALIFORNIA  
3990 Old Town Avenue, Suite A105  
San Diego, CA 92110

3 November 2022

Theresa Hernandez, Chairperson  
Mesa Grande Band of Diegueno Mission Indians  
PO Box 270  
Santa Ysabel, CA 92070  
Transmitted via email to [theresa@mesagrande-nsn.gov](mailto:theresa@mesagrande-nsn.gov)

**Re:** Cultural Resource Study for the 6<sup>th</sup> at Spears Apts El Centro Project, in El Centro, Imperial County, California

Dear Chairperson Hernandez,

On behalf of Birdseye Planning Group (BPG), PaleoWest is conducting a cultural resource study for the proposed 6<sup>th</sup> at Spears Apts El Centro Project (Project) located at the northeast corner of 6<sup>th</sup> Street and Spears Avenue, in El Centro, Imperial County, California. The cultural resource investigation is being conducted in compliance with the California Environmental Quality Act (CEQA). Because the Project may seek federal funding assistance, the cultural resources study will also be prepared for compliance with Section 106 of the National Historic Preservation Act (Section 106).

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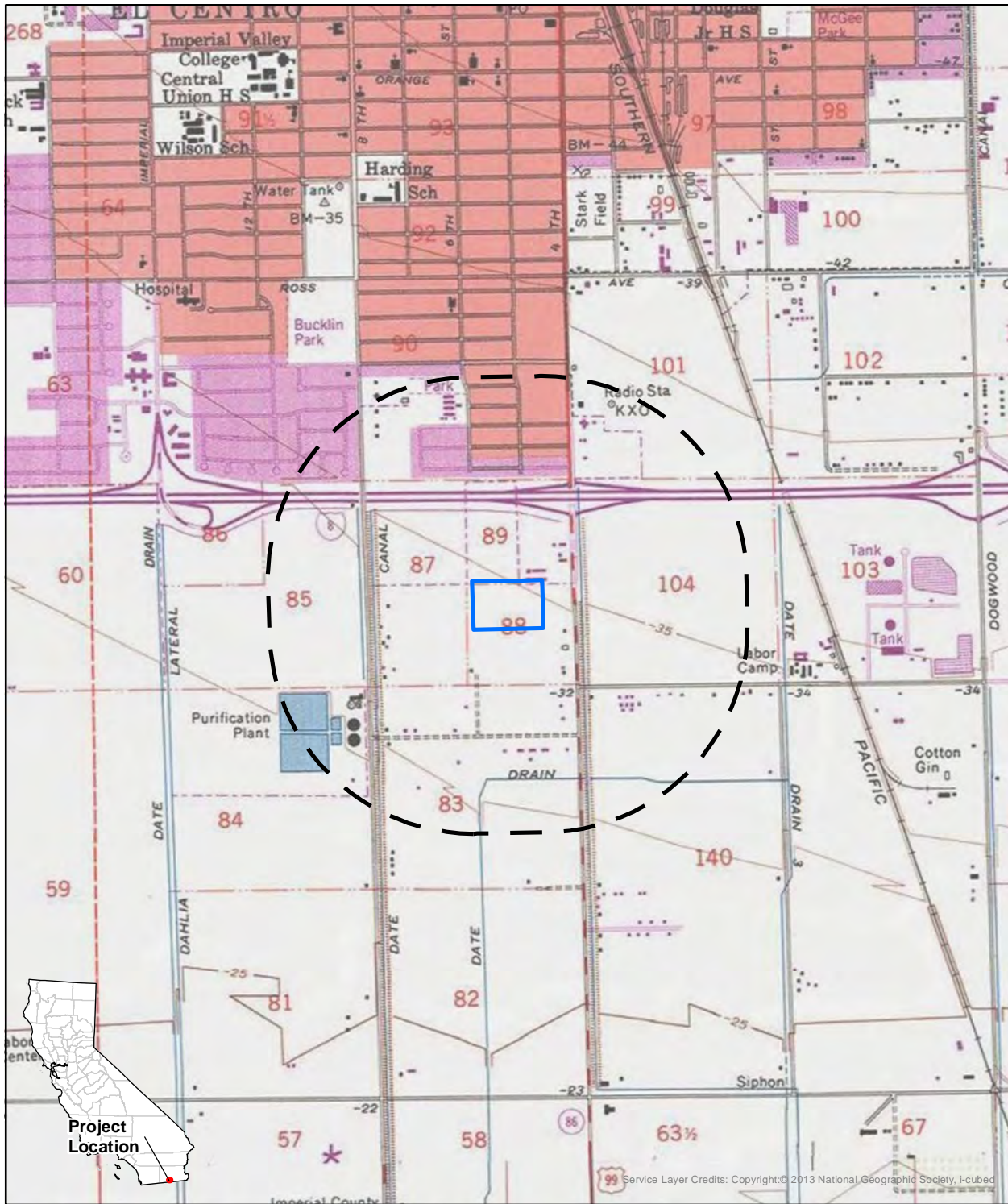
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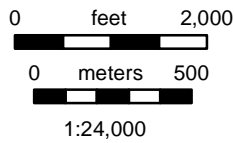
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Paige Kohler | Associate Archaeologist  
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T: 619.210.0199  
F: 602.254.6280  
info@paleowest.com

SAN DIEGO, CALIFORNIA  
3990 Old Town Avenue, Suite A105  
San Diego, CA 92110

3 November 2022

Jamie Lebrake and Charlene Elliott, Kumeyaay Resource Specialists  
Sycuan Band of the Kumeyaay Nation  
1 Kwaaypaay Court  
El Cajon, CA 92019  
Transmitted via email to cworrell@sycuan-nsn.gov

**Re:** Cultural Resource Study for the 6<sup>th</sup> at Spears Apts El Centro Project, in El Centro, Imperial County, California

Dear Mr. Lebrake and Ms. Elliott,

On behalf of Birdseye Planning Group (BPG), PaleoWest is conducting a cultural resource study for the proposed 6<sup>th</sup> at Spears Apts El Centro Project (Project) located at the northeast corner of 6<sup>th</sup> Street and Spears Avenue, in El Centro, Imperial County, California. The cultural resource investigation is being conducted in compliance with the California Environmental Quality Act (CEQA). Because the Project may seek federal funding assistance, the cultural resources study will also be prepared for compliance with Section 106 of the National Historic Preservation Act (Section 106).

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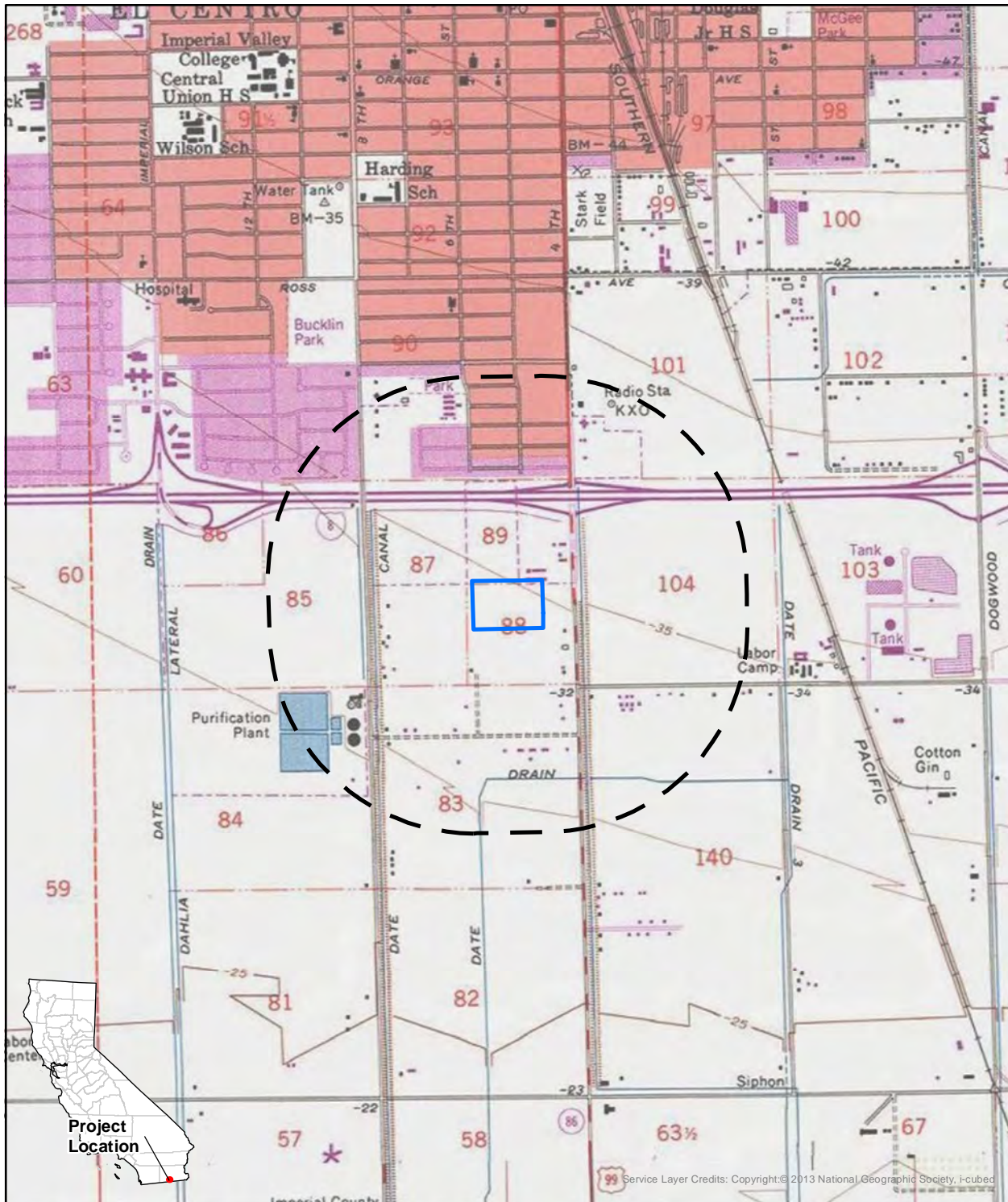
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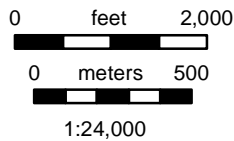
Paige Kohler | Associate Archaeologist  
PALEOWEST







Project Location

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 Project Area  
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T: 619.210.0199  
F: 602.254.6280  
info@paleowest.com

SAN DIEGO, CALIFORNIA  
3990 Old Town Avenue, Suite A105  
San Diego, CA 92110

3 November 2022

Carmen Lucas  
Kwaaymii Laguna Band of Mission Indians  
PO Box 775  
Pine Valley, CA 91962

**Re:** Cultural Resource Study for the 6<sup>th</sup> at Spears Apts El Centro Project, in El Centro, Imperial County, California

Dear Ms. Lucas,

On behalf of Birdseye Planning Group (BPG), PaleoWest is conducting a cultural resource study for the proposed 6<sup>th</sup> at Spears Apts El Centro Project (Project) located at the northeast corner of 6<sup>th</sup> Street and Spears Avenue, in El Centro, Imperial County, California. The cultural resource investigation is being conducted in compliance with the California Environmental Quality Act (CEQA). Because the Project may seek federal funding assistance, the cultural resources study will also be prepared for compliance with Section 106 of the National Historic Preservation Act (Section 106).

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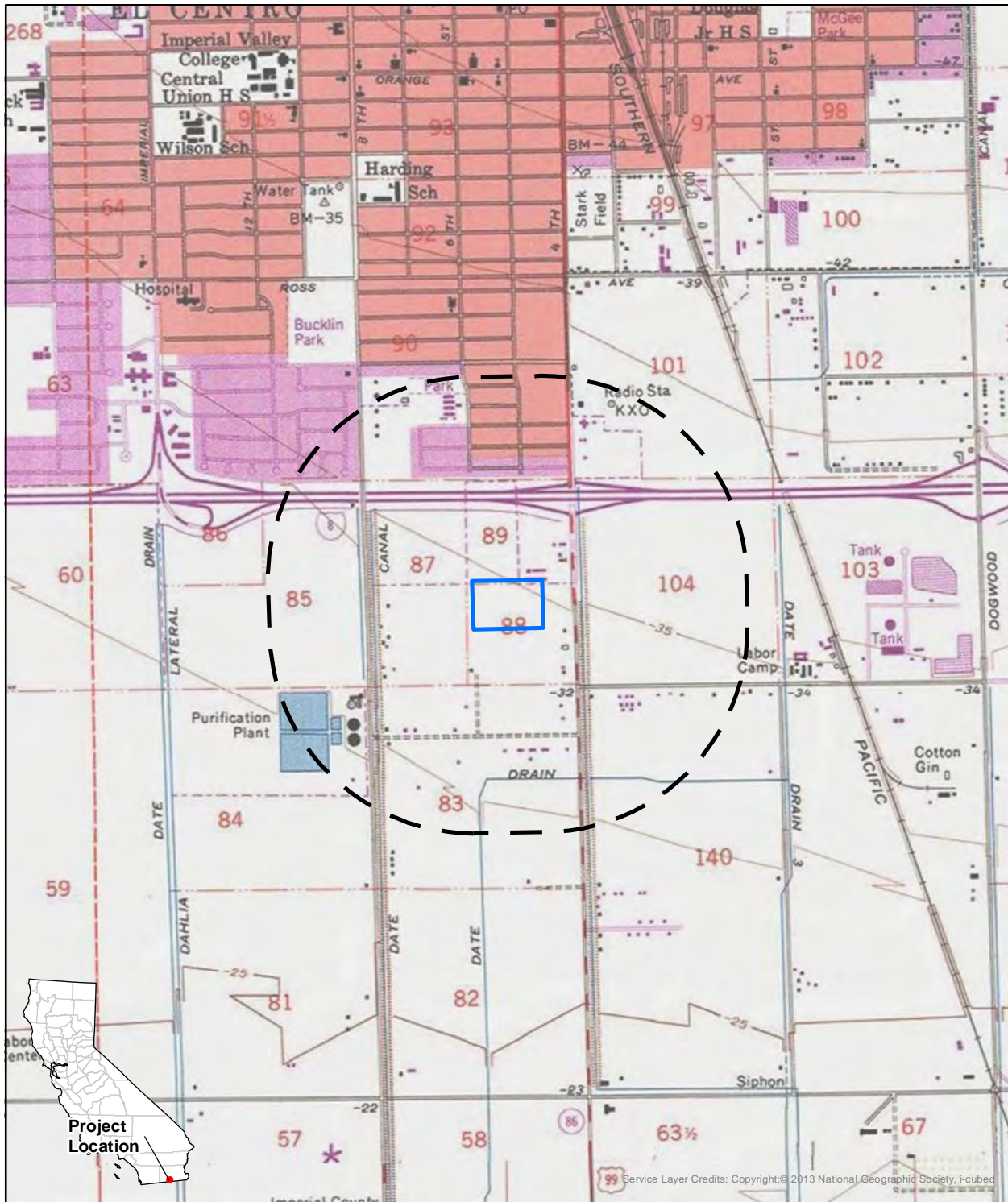
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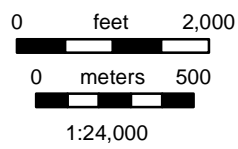
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T: 619.210.0199  
F: 602.254.6280  
info@paleowest.com

SAN DIEGO, CALIFORNIA  
3990 Old Town Avenue, Suite A105  
San Diego, CA 92110

3 November 2022

Jill McCormick, Historic Preservation Officer  
Quechan Tribe of the Fort Yuma Reservation  
PO Box 1899  
Yuma, AZ 85366  
Transmitted via email to [historicpreservation@quechantribe.com](mailto:historicpreservation@quechantribe.com)

**Re:** Cultural Resource Study for the 6<sup>th</sup> at Spears Apts El Centro Project, in El Centro, Imperial County, California

Dear Ms. McCormick,

On behalf of Birdseye Planning Group (BPG), PaleoWest is conducting a cultural resource study for the proposed 6<sup>th</sup> at Spears Apts El Centro Project (Project) located at the northeast corner of 6<sup>th</sup> Street and Spears Avenue, in El Centro, Imperial County, California. The cultural resource investigation is being conducted in compliance with the California Environmental Quality Act (CEQA). Because the Project may seek federal funding assistance, the cultural resources study will also be prepared for compliance with Section 106 of the National Historic Preservation Act (Section 106).

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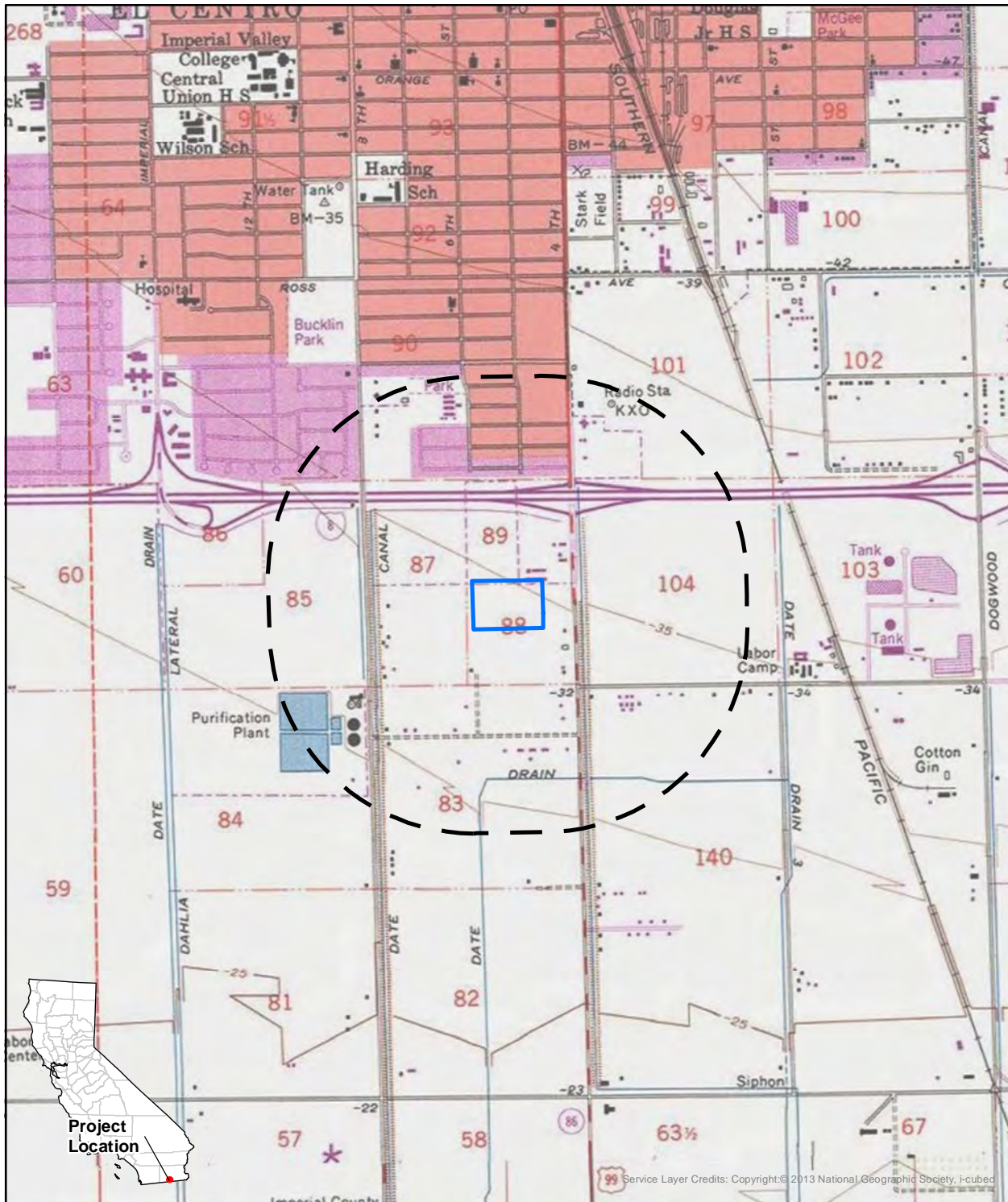
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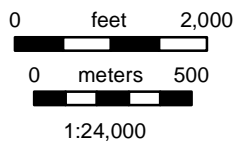
Paige Kohler | Associate Archaeologist  
PALEOWEST







Project Location

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T: 619.210.0199  
F: 602.254.6280  
info@paleowest.com

SAN DIEGO, CALIFORNIA  
3990 Old Town Avenue, Suite A105  
San Diego, CA 92110

3 November 2022

Javaughn Miller, Tribal Administrator  
La Posta Band of Diegueno Mission Indians  
8 Crestwood Road  
Boulevard, CA 91905  
Transmitted via email to jmiller@LPtribe.net

**Re:** Cultural Resource Study for the 6<sup>th</sup> at Spears Apts El Centro Project, in El Centro, Imperial County, California

Dear Mr. Miller,

On behalf of Birdseye Planning Group (BPG), PaleoWest is conducting a cultural resource study for the proposed 6<sup>th</sup> at Spears Apts El Centro Project (Project) located at the northeast corner of 6<sup>th</sup> Street and Spears Avenue, in El Centro, Imperial County, California. The cultural resource investigation is being conducted in compliance with the California Environmental Quality Act (CEQA). Because the Project may seek federal funding assistance, the cultural resources study will also be prepared for compliance with Section 106 of the National Historic Preservation Act (Section 106).

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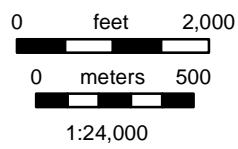
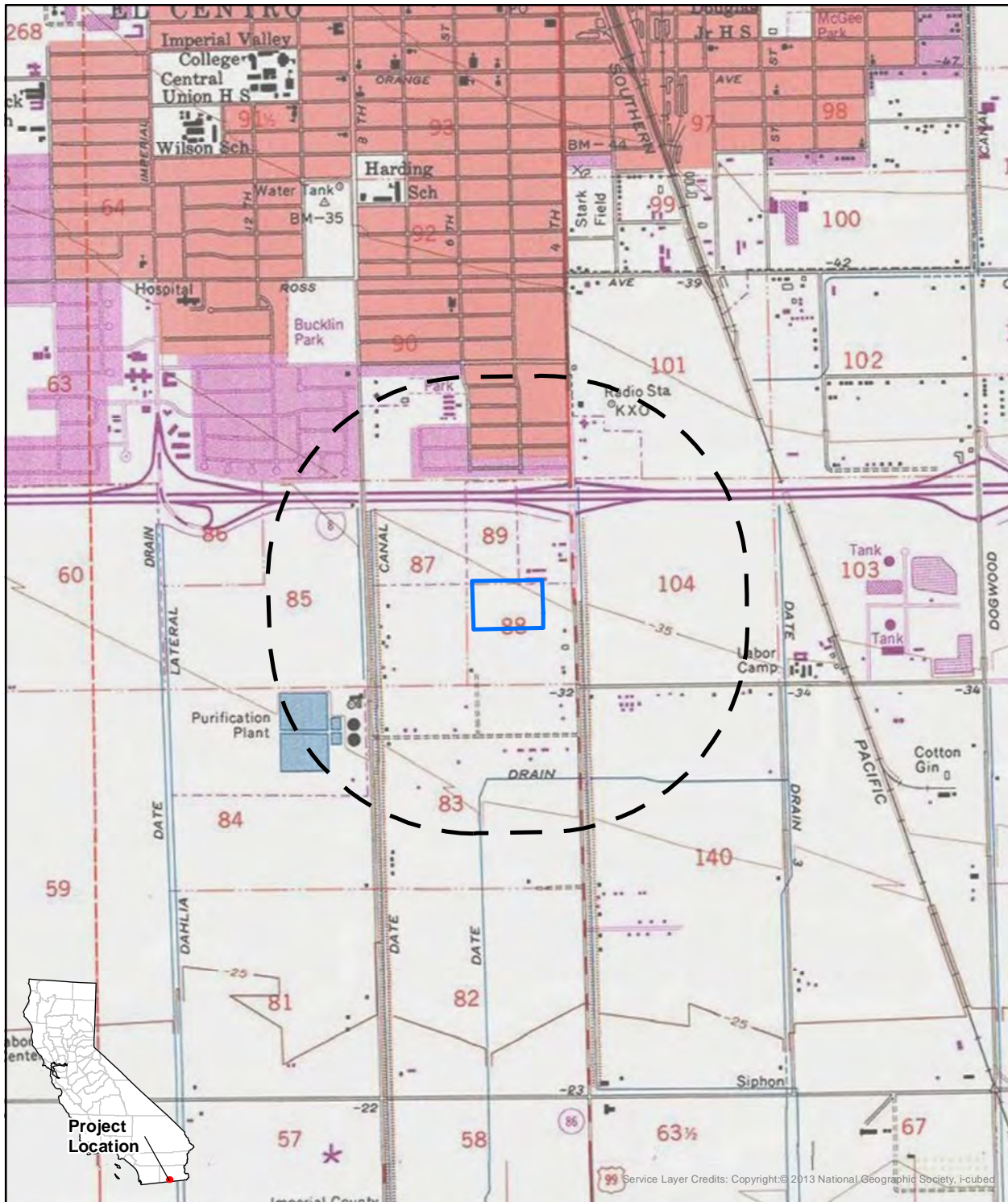
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Paige Kohler | Associate Archaeologist  
PALEOWEST





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T: 619.210.0199  
F: 602.254.6280  
info@paleowest.com

SAN DIEGO, CALIFORNIA  
3990 Old Town Avenue, Suite A105  
San Diego, CA 92110

3 November 2022

Rebecca Osuna, Chairperson  
Inaja-Cosmit Band of Indians  
2005 S. Escondido Blvd.  
Escondido, CA 92025  
Transmitted via email to Inaja\_cosmitrez@hotmail.com

**Re:** Cultural Resource Study for the 6<sup>th</sup> at Spears Apts El Centro Project, in El Centro, Imperial County, California

Dear Chairperson Osuna,

On behalf of Birdseye Planning Group (BPG), PaleoWest is conducting a cultural resource study for the proposed 6<sup>th</sup> at Spears Apts El Centro Project (Project) located at the northeast corner of 6<sup>th</sup> Street and Spears Avenue, in El Centro, Imperial County, California. The cultural resource investigation is being conducted in compliance with the California Environmental Quality Act (CEQA). Because the Project may seek federal funding assistance, the cultural resources study will also be prepared for compliance with Section 106 of the National Historic Preservation Act (Section 106).

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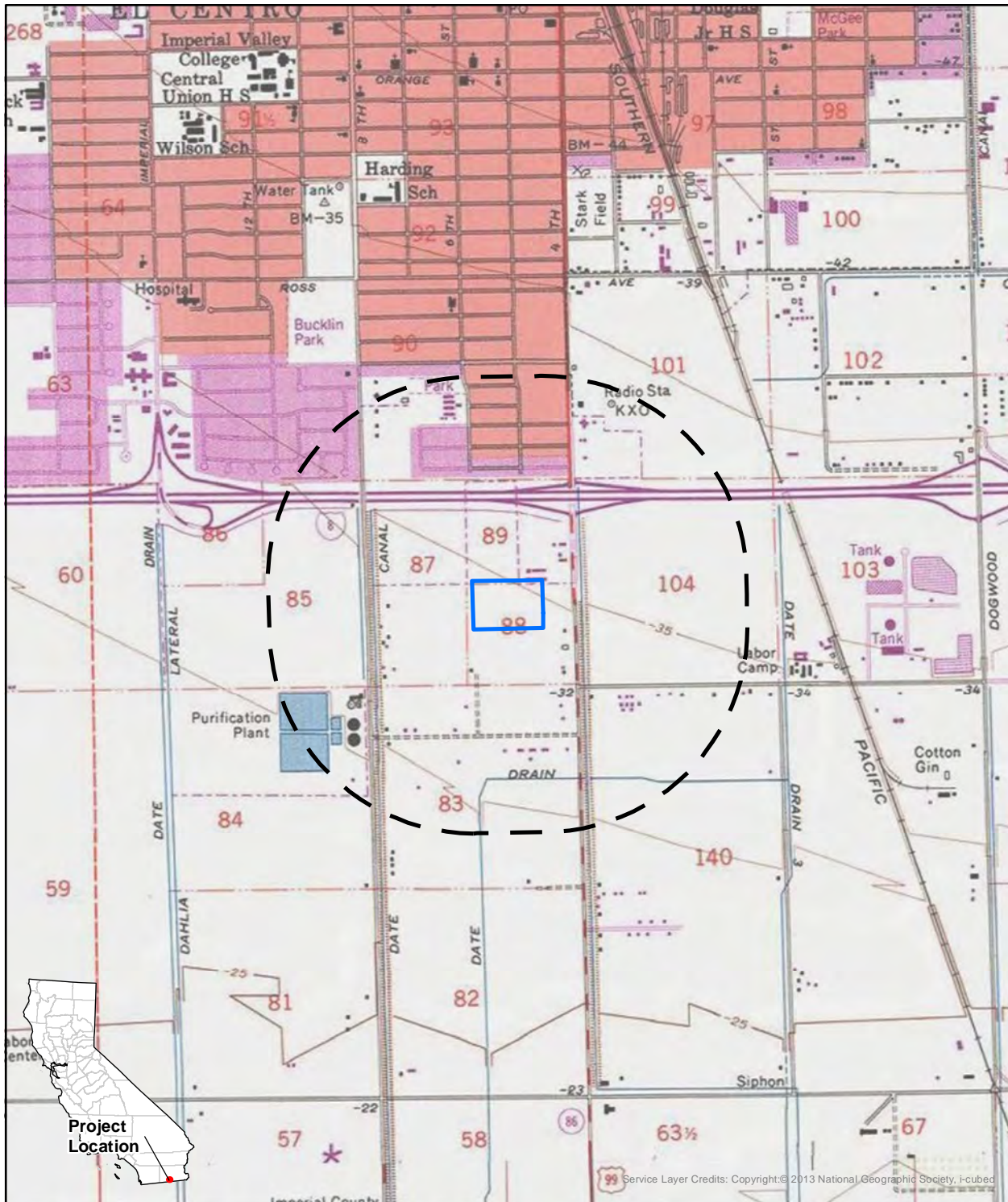
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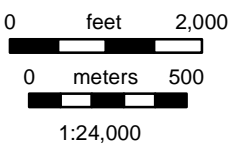

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PALEOWEST








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**SBBM**

 Project Area  
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T: 619.210.0199  
F: 602.254.6280  
info@paleowest.com

SAN DIEGO, CALIFORNIA  
3990 Old Town Avenue, Suite A105  
San Diego, CA 92110

3 November 2022

Bernice Paipa, Chairperson  
Iipay Nation of Santa Ysabel, California  
PO Box 130  
Santa Ysabel, CA 92070-0130  
Transmitted via email to bpaipa@iipaynation-nsn.gov

**Re:** Cultural Resource Study for the 6<sup>th</sup> at Spears Apts El Centro Project, in El Centro, Imperial County, California

Dear Chairperson Paipa,

On behalf of Birdseye Planning Group (BPG), PaleoWest is conducting a cultural resource study for the proposed 6<sup>th</sup> at Spears Apts El Centro Project (Project) located at the northeast corner of 6<sup>th</sup> Street and Spears Avenue, in El Centro, Imperial County, California. The cultural resource investigation is being conducted in compliance with the California Environmental Quality Act (CEQA). Because the Project may seek federal funding assistance, the cultural resources study will also be prepared for compliance with Section 106 of the National Historic Preservation Act (Section 106).

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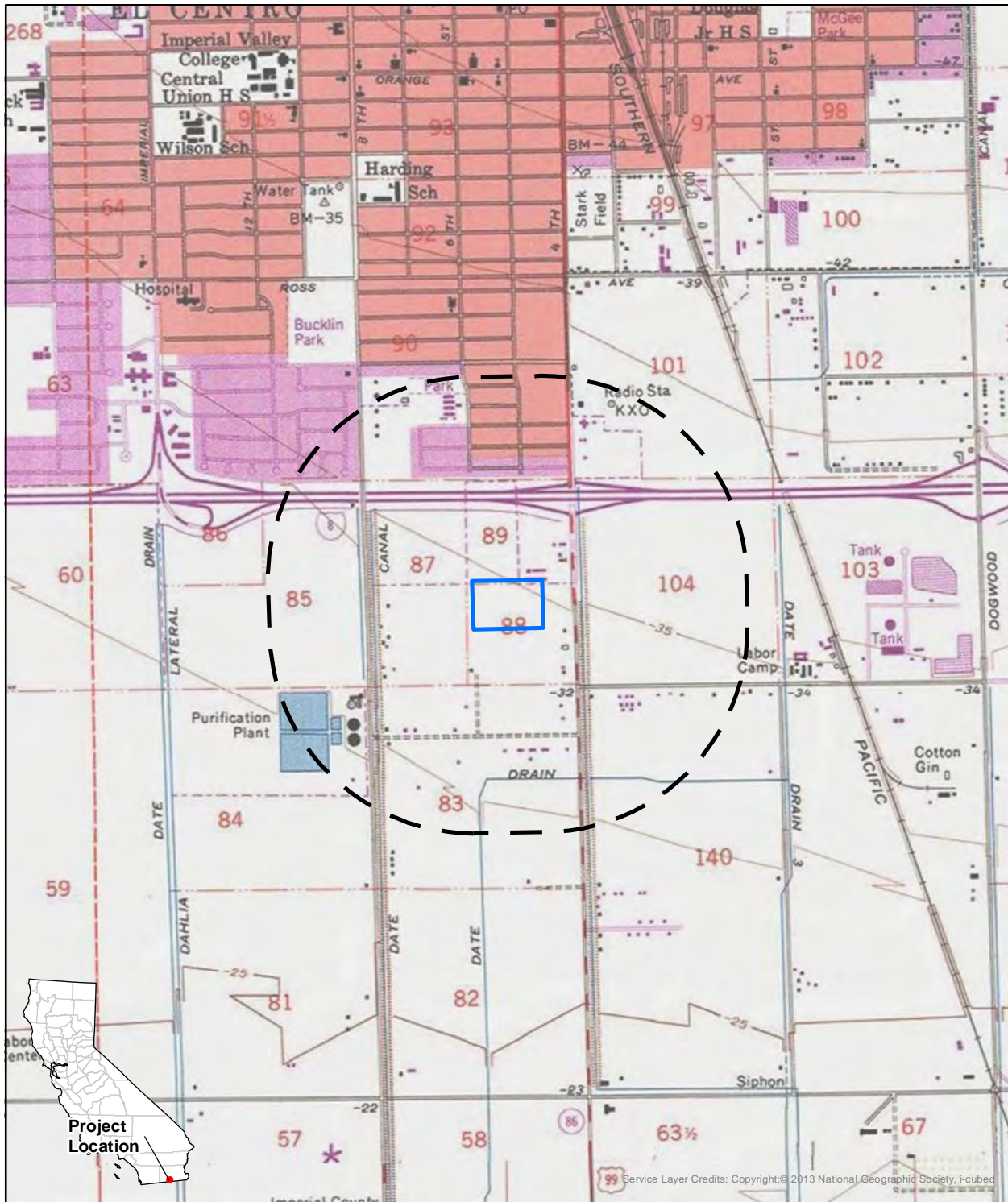
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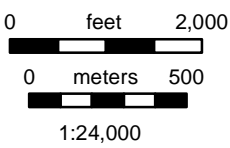

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T: 619.210.0199  
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SAN DIEGO, CALIFORNIA  
3990 Old Town Avenue, Suite A105  
San Diego, CA 92110

3 November 2022

Gwendolyn Parada, Chairperson  
La Posta Band of Diegueno Mission Indians  
8 Crestwood Road  
Boulevard, CA 91905  
Transmitted via email to LP13boots@aol.com

**Re:** Cultural Resource Study for the 6<sup>th</sup> at Spears Apts El Centro Project, in El Centro, Imperial County, California

Dear Chairperson Parada,

On behalf of Birdseye Planning Group (BPG), PaleoWest is conducting a cultural resource study for the proposed 6<sup>th</sup> at Spears Apts El Centro Project (Project) located at the northeast corner of 6<sup>th</sup> Street and Spears Avenue, in El Centro, Imperial County, California. The cultural resource investigation is being conducted in compliance with the California Environmental Quality Act (CEQA). Because the Project may seek federal funding assistance, the cultural resources study will also be prepared for compliance with Section 106 of the National Historic Preservation Act (Section 106).

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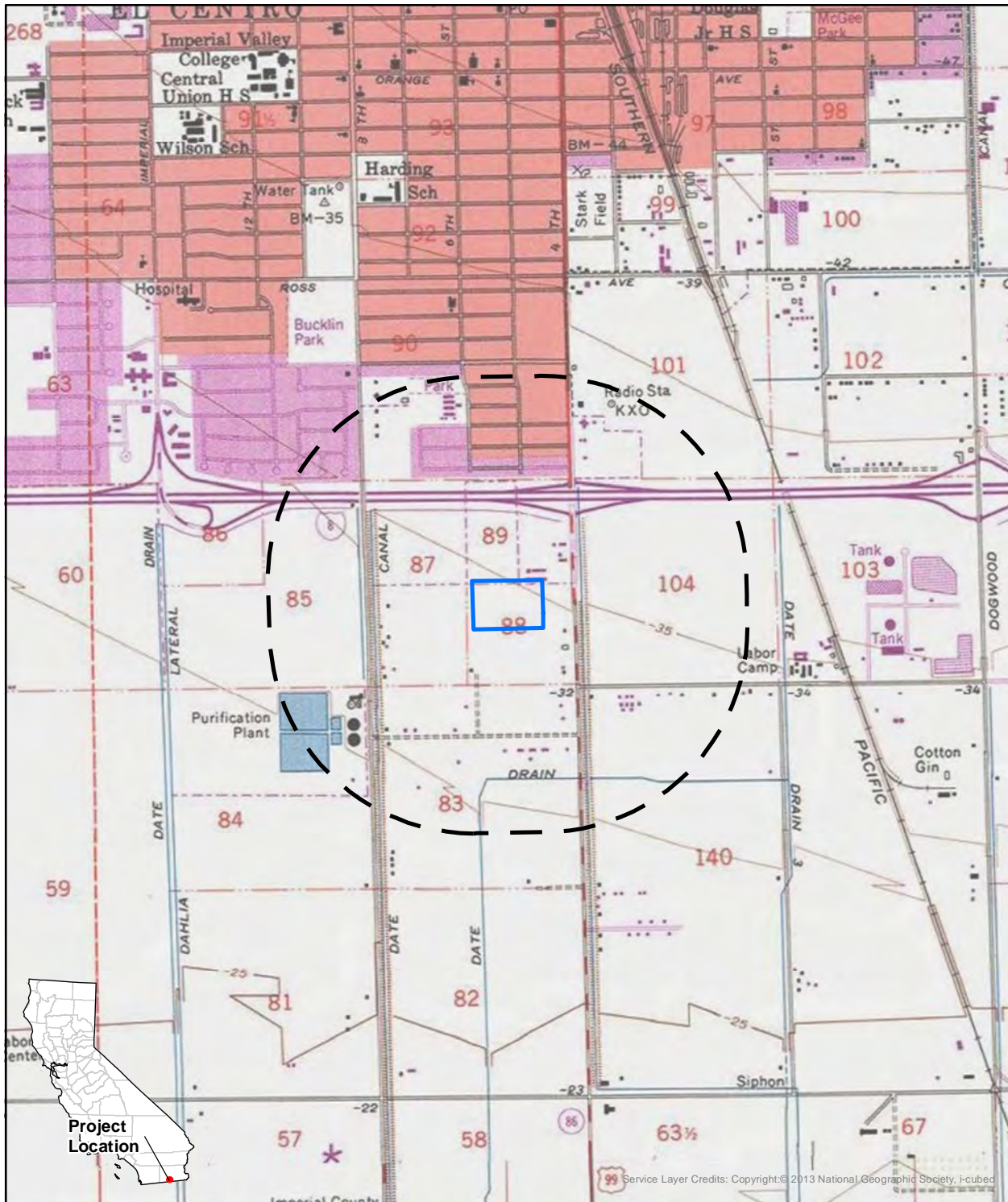
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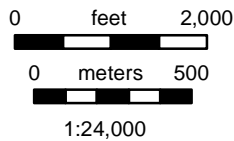
Kind Regards,

Paige Kohler | Associate Archaeologist  
**PALEOWEST**







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**USGS 7.5' Quadrangle:**  
**El Centro, Ca (1980)**  
**T16S 14E, Secs 7-8 & 17-18**  
**UTM Zone 11, NAD 83**  
**SBBM**

 Project Area  
 0.5 mi buffer



T: 619.210.0199  
F: 602.254.6280  
info@paleowest.com

SAN DIEGO, CALIFORNIA  
3990 Old Town Avenue, Suite A105  
San Diego, CA 92110

3 November 2022

Ernest Pingleton, Tribal Historic Officer  
Viejas Band of Kumeyaay Indians  
1 Viejas Grade Road  
Alpine, CA 91901  
Transmitted via email to epingleton@viejas-nsn.gov

**Re:** Cultural Resource Study for the 6<sup>th</sup> at Spears Apts El Centro Project, in El Centro, Imperial County, California

Dear Mr. Pingleton,

On behalf of Birdseye Planning Group (BPG), PaleoWest is conducting a cultural resource study for the proposed 6<sup>th</sup> at Spears Apts El Centro Project (Project) located at the northeast corner of 6<sup>th</sup> Street and Spears Avenue, in El Centro, Imperial County, California. The cultural resource investigation is being conducted in compliance with the California Environmental Quality Act (CEQA). Because the Project may seek federal funding assistance, the cultural resources study will also be prepared for compliance with Section 106 of the National Historic Preservation Act (Section 106).

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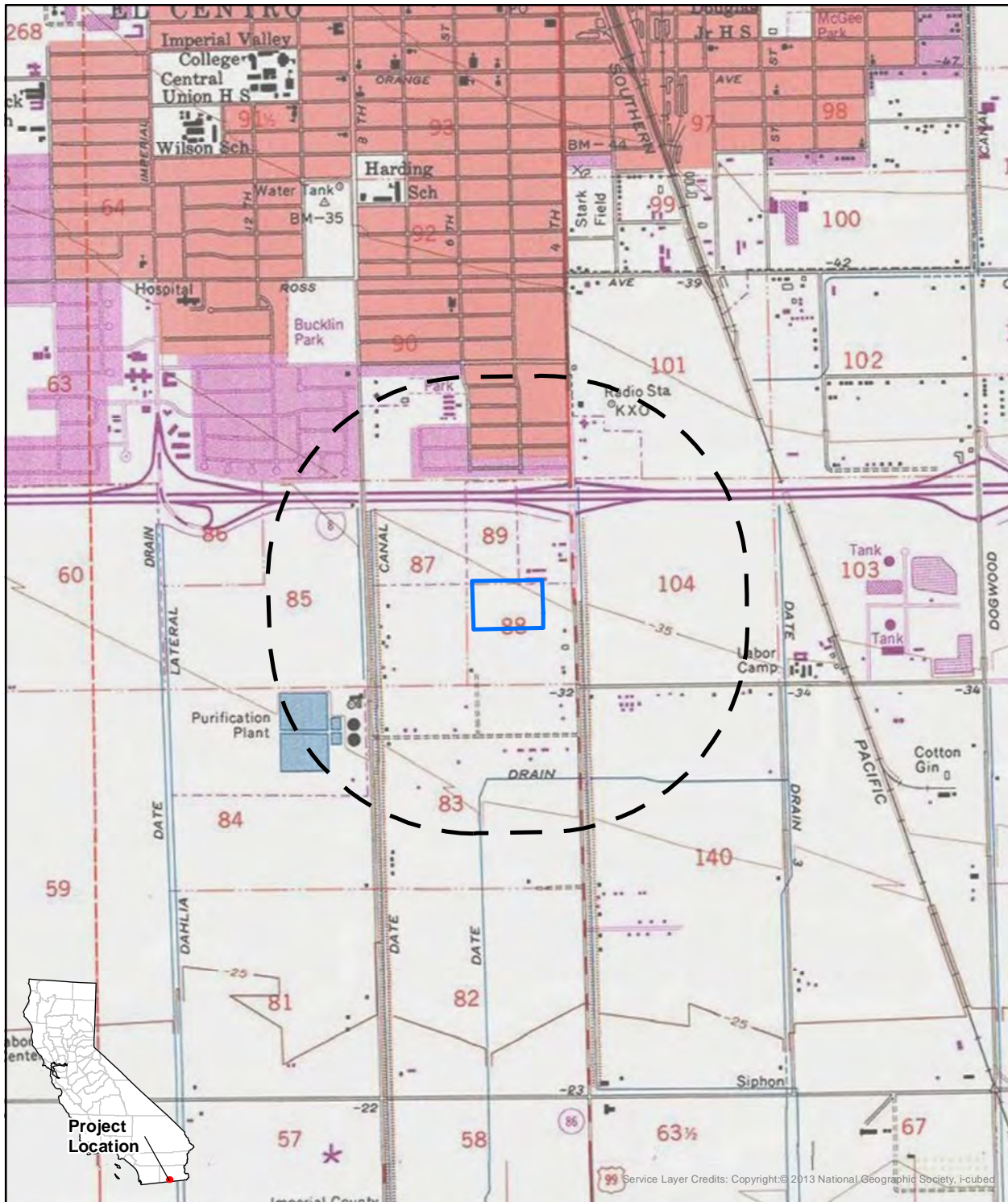
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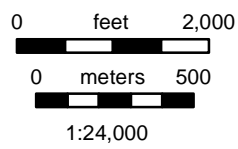
Kind Regards,

Paige Kohler | Associate Archaeologist  
PALEOWEST







Project Location



USGS 7.5' Quadrangle:  
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 UTM Zone 11, NAD 83  
 SBBM

 Project Area  
 0.5 mi buffer

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T: 619.210.0199  
F: 602.254.6280  
info@paleowest.com

SAN DIEGO, CALIFORNIA  
3990 Old Town Avenue, Suite A105  
San Diego, CA 92110

3 November 2022

Erica Pinto, Chairperson  
Jamul Indian Village  
PO Box 612  
Jamul, CA 91935  
Transmitted via email to epinto@jiv-nsn.gov

**Re:** Cultural Resource Study for the 6<sup>th</sup> at Spears Apts El Centro Project, in El Centro, Imperial County, California

Dear Chairperson Pinto,

On behalf of Birdseye Planning Group (BPG), PaleoWest is conducting a cultural resource study for the proposed 6<sup>th</sup> at Spears Apts El Centro Project (Project) located at the northeast corner of 6<sup>th</sup> Street and Spears Avenue, in El Centro, Imperial County, California. The cultural resource investigation is being conducted in compliance with the California Environmental Quality Act (CEQA). Because the Project may seek federal funding assistance, the cultural resources study will also be prepared for compliance with Section 106 of the National Historic Preservation Act (Section 106).

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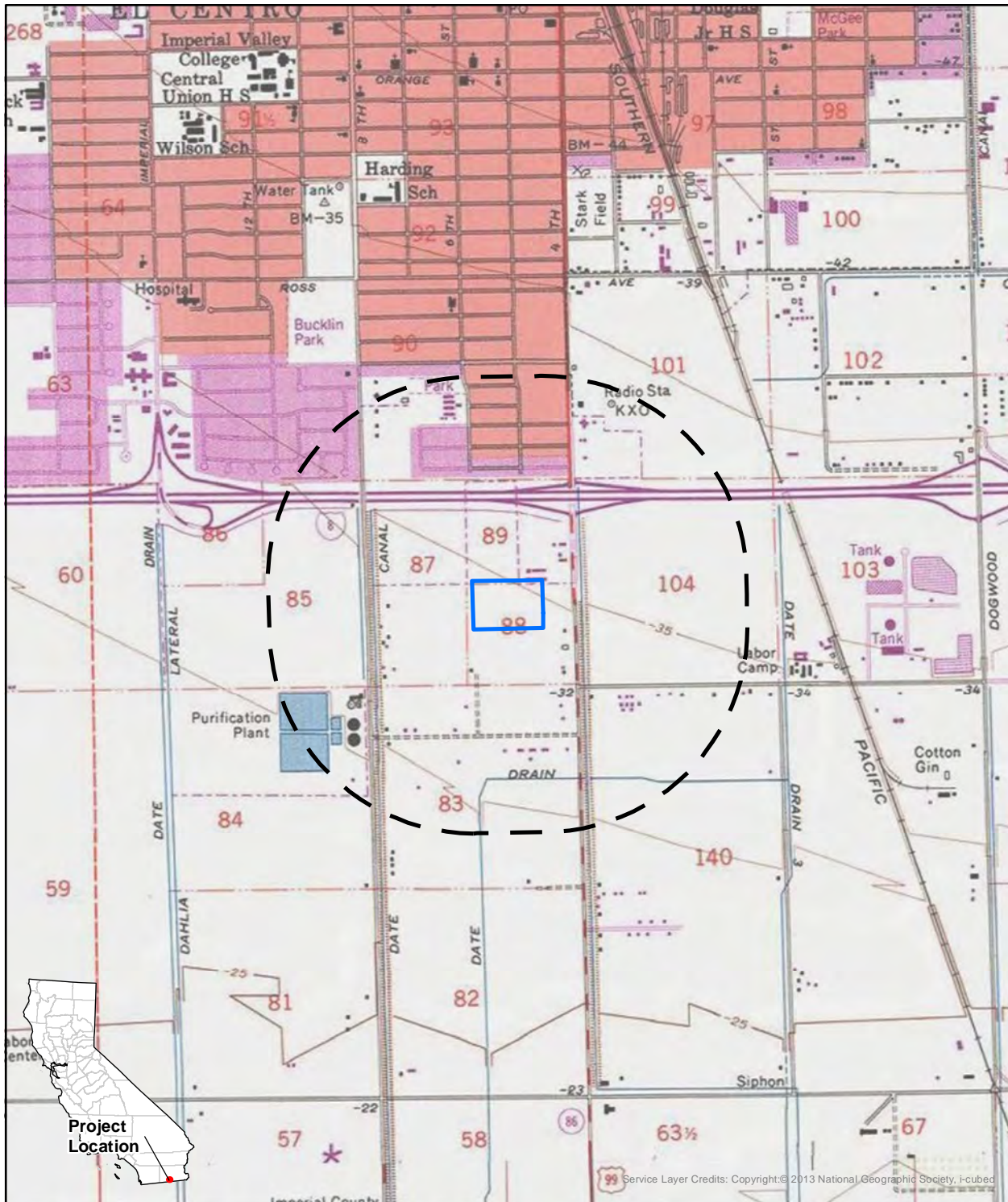
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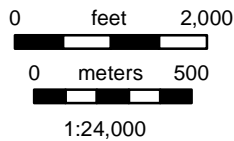
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Paige Kohler | Associate Archaeologist  
PALEOWEST







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**USGS 7.5' Quadrangle:**  
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**UTM Zone 11, NAD 83**  
**SBBM**

 Project Area  
 0.5 mi buffer



T: 619.210.0199  
F: 602.254.6280  
info@paleowest.com

SAN DIEGO, CALIFORNIA  
3990 Old Town Avenue, Suite A105  
San Diego, CA 92110

3 November 2022

Robert Pinto, Chairperson  
Ewiiapaayp Band of Kumeyaay Indians  
4054 Willows Road  
Alpine, CA 91901  
Transmitted via email to ceo@ebki-nsn.gov

**Re:** Cultural Resource Study for the 6<sup>th</sup> at Spears Apts El Centro Project, in El Centro, Imperial County, California

Dear Chairperson Pinto,

On behalf of Birdseye Planning Group (BPG), PaleoWest is conducting a cultural resource study for the proposed 6<sup>th</sup> at Spears Apts El Centro Project (Project) located at the northeast corner of 6<sup>th</sup> Street and Spears Avenue, in El Centro, Imperial County, California. The cultural resource investigation is being conducted in compliance with the California Environmental Quality Act (CEQA). Because the Project may seek federal funding assistance, the cultural resources study will also be prepared for compliance with Section 106 of the National Historic Preservation Act (Section 106).

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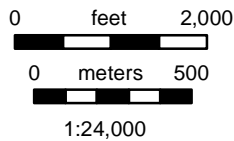
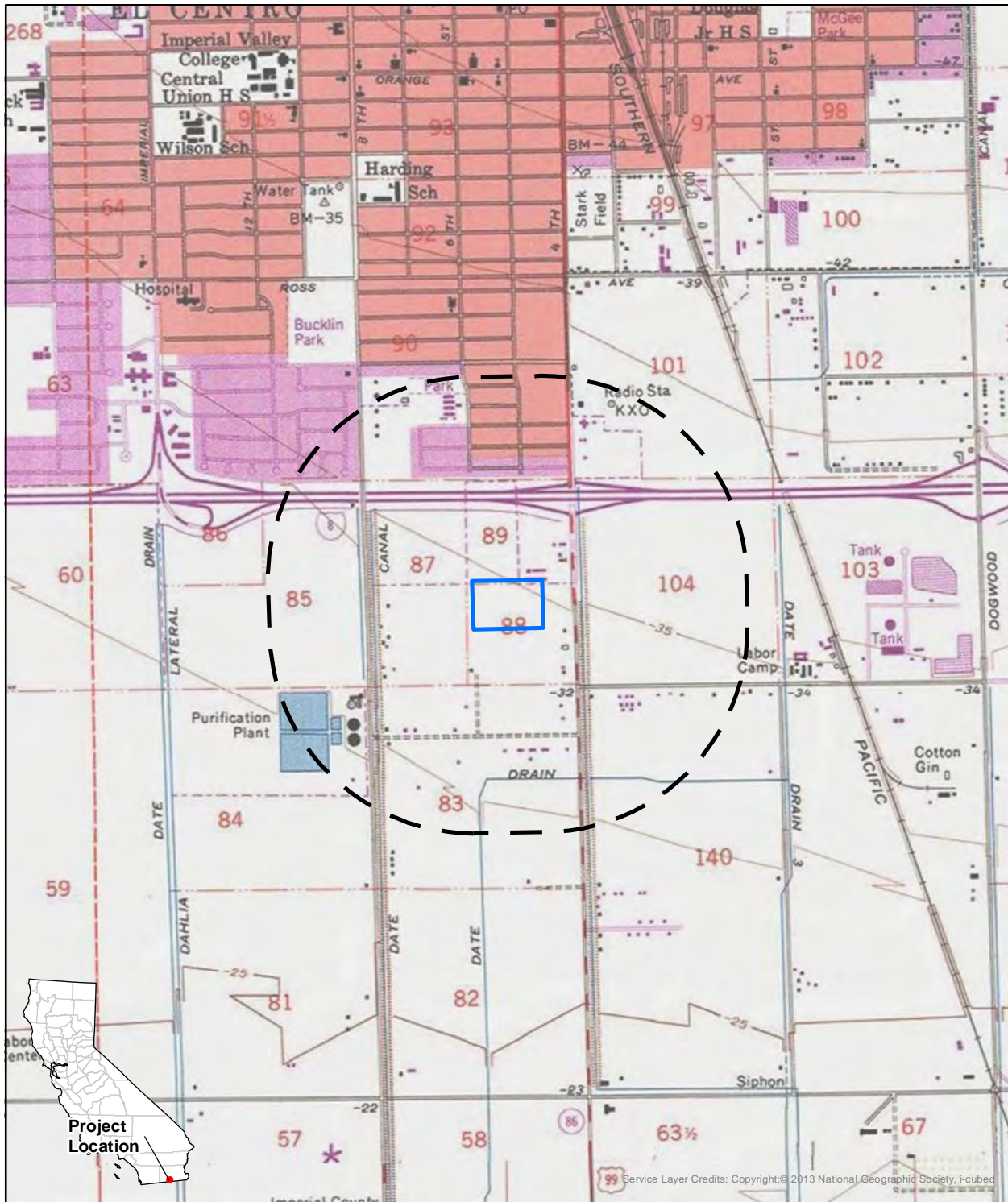
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Kind Regards,

Paige Kohler | Associate Archaeologist  
PALEOWEST





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 SBBM

 Project Area  
 0.5 mi buffer

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T: 619.210.0199  
F: 602.254.6280  
info@paleowest.com

SAN DIEGO, CALIFORNIA  
3990 Old Town Avenue, Suite A105  
San Diego, CA 92110

3 November 2022

Angela Elliott Santos, Chairperson  
Manzanita Band of Kumeyaay Indians  
PO Box 1302  
Boulevard, CA 91905  
Transmitted via email to LJbirdsinger@aol.com

**Re:** Cultural Resource Study for the 6<sup>th</sup> at Spears Apts El Centro Project, in El Centro, Imperial County, California

Dear Chairperson Santos,

On behalf of Birdseye Planning Group (BPG), PaleoWest is conducting a cultural resource study for the proposed 6<sup>th</sup> at Spears Apts El Centro Project (Project) located at the northeast corner of 6<sup>th</sup> Street and Spears Avenue, in El Centro, Imperial County, California. The cultural resource investigation is being conducted in compliance with the California Environmental Quality Act (CEQA). Because the Project may seek federal funding assistance, the cultural resources study will also be prepared for compliance with Section 106 of the National Historic Preservation Act (Section 106).

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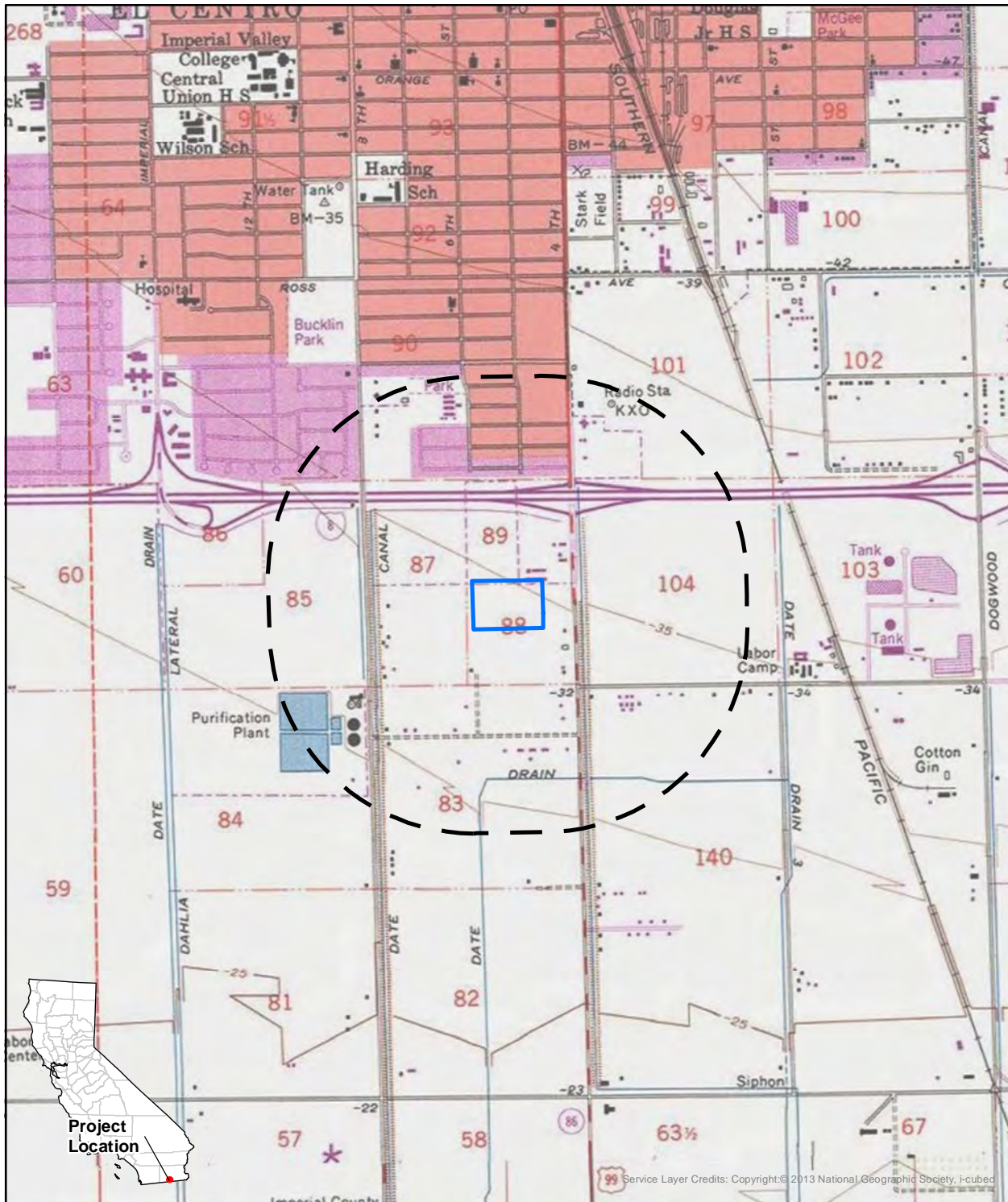
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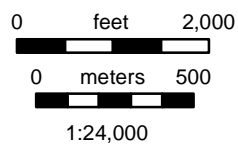
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Paige Kohler | Associate Archaeologist  
PALEOWEST







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**USGS 7.5' Quadrangle:**  
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**UTM Zone 11, NAD 83**  
**SBBM**

 Project Area  
 0.5 mi buffer



T: 619.210.0199  
F: 602.254.6280  
info@paleowest.com

SAN DIEGO, CALIFORNIA  
3990 Old Town Avenue, Suite A105  
San Diego, CA 92110

3 November 2022

Ray Teran  
Viejas Band of Kumeyaay Indians  
1 Viejas Grade Road  
Alpine, CA 91901  
Transmitted via email to rteran@viejas-nsn.gov

**Re:** Cultural Resource Study for the 6<sup>th</sup> at Spears Apts El Centro Project, in El Centro, Imperial County, California

Dear Mr. Teran,

On behalf of Birdseye Planning Group (BPG), PaleoWest is conducting a cultural resource study for the proposed 6<sup>th</sup> at Spears Apts El Centro Project (Project) located at the northeast corner of 6<sup>th</sup> Street and Spears Avenue, in El Centro, Imperial County, California. The cultural resource investigation is being conducted in compliance with the California Environmental Quality Act (CEQA). Because the Project may seek federal funding assistance, the cultural resources study will also be prepared for compliance with Section 106 of the National Historic Preservation Act (Section 106).

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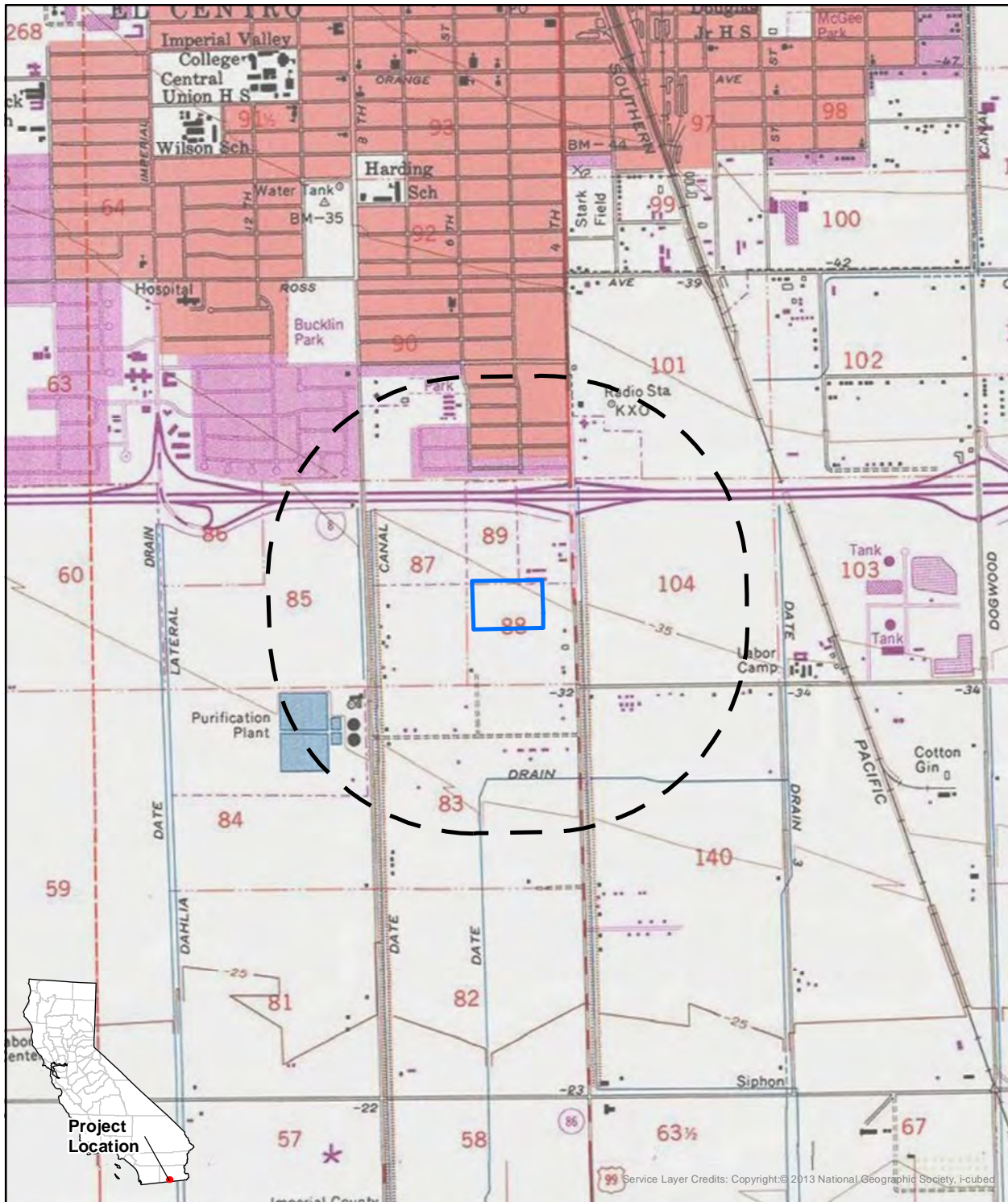
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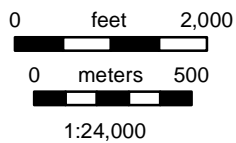
Paige Kohler | Associate Archaeologist  
PALEOWEST







Project Location

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T: 619.210.0199  
F: 602.254.6280  
info@paleowest.com

SAN DIEGO, CALIFORNIA  
3990 Old Town Avenue, Suite A105  
San Diego, CA 92110

3 November 2022

Raymond Welch, Chairperson  
Barona Group of the Capitan Grande  
1095 Barona Road  
Lakeside, CA 92040  
Transmitted via email to rwelch@barona-nsn.gov

**Re:** Cultural Resource Study for the 6<sup>th</sup> at Spears Apts El Centro Project, in El Centro, Imperial County, California

Dear Chairperson Welch,

On behalf of Birdseye Planning Group (BPG), PaleoWest is conducting a cultural resource study for the proposed 6<sup>th</sup> at Spears Apts El Centro Project (Project) located at the northeast corner of 6<sup>th</sup> Street and Spears Avenue, in El Centro, Imperial County, California. The cultural resource investigation is being conducted in compliance with the California Environmental Quality Act (CEQA). Because the Project may seek federal funding assistance, the cultural resources study will also be prepared for compliance with Section 106 of the National Historic Preservation Act (Section 106).

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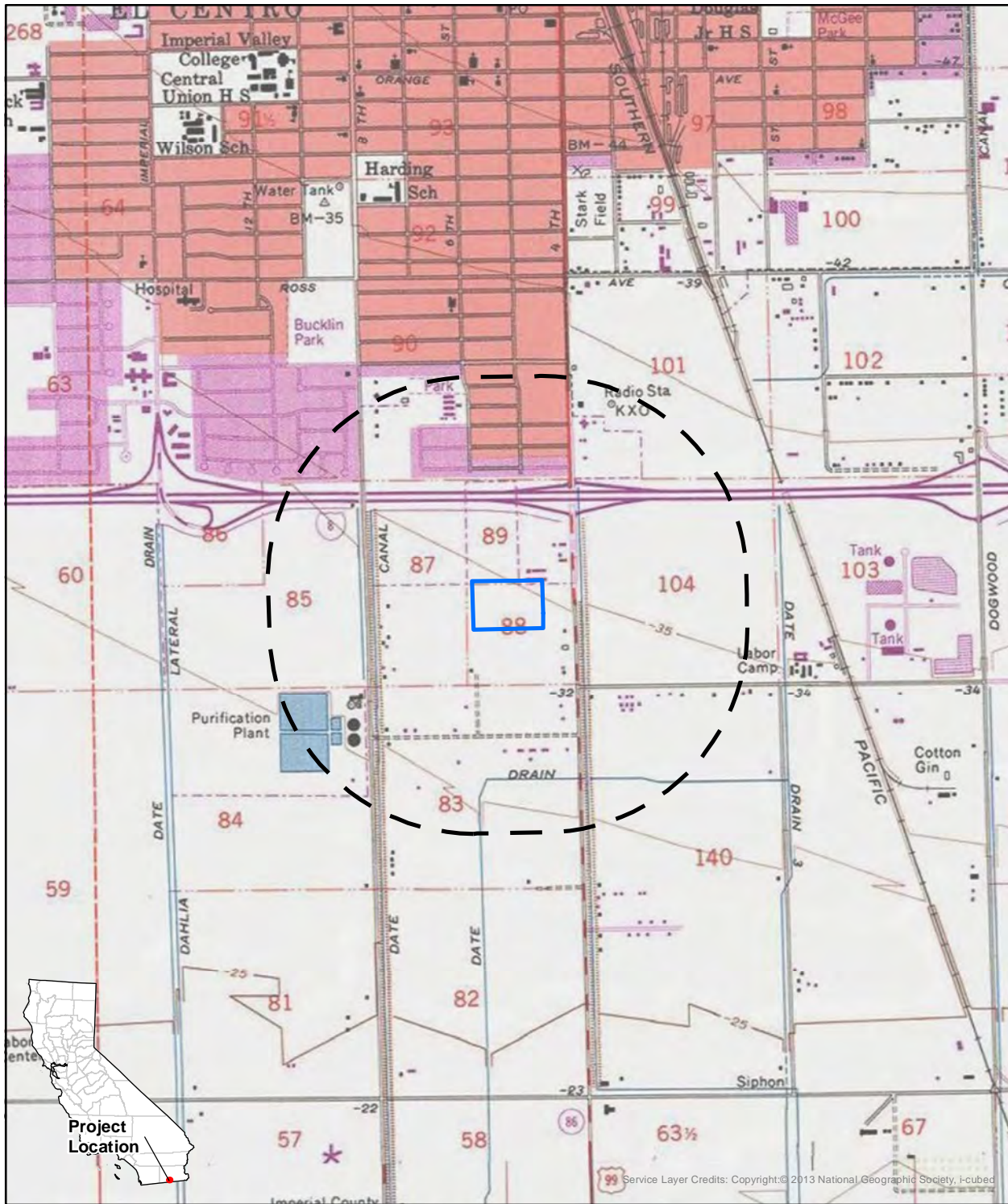
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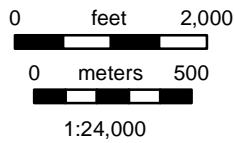
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Paige Kohler | Associate Archaeologist  
PALEOWEST







Project Location



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 T16S 14E, Secs 7-8 & 17-18  
 UTM Zone 11, NAD 83  
 SBBM

 Project Area  
 0.5 mi buffer

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**From:** [Quechan Historic Preservation](#)  
**To:** [Paige Kohler](#)  
**Subject:** RE: Cultural Resources Study for the 6th at Spears Apts El Centro Project, Imperial County, CA  
**Date:** Thursday, November 3, 2022 2:06:13 PM  
**Attachments:** [image001.png](#)  
[image006.png](#)  
[image007.png](#)  
[image008.png](#)  
[image009.png](#)

---

This email is to inform you that we do not wish to provide Paleowest with comments on this project.

---

**From:** Paige Kohler [mailto:[pkohler@paleowest.com](mailto:pkohler@paleowest.com)]  
**Sent:** Thursday, November 3, 2022 1:48 PM  
**To:** [historicpreservation@quechantribe.com](mailto:historicpreservation@quechantribe.com)  
**Subject:** Cultural Resources Study for the 6th at Spears Apts El Centro Project, Imperial County, CA

Greetings,

Please see the attached letter and map for the Cultural Resources Study for the 6<sup>th</sup> at Spears Apts El Centro Project, in Imperial County, California.

Best,



**Paige Kohler, M.A.** | Associate Archaeologist

[pkohler@paleowest.com](mailto:pkohler@paleowest.com)

Work: 619.210.0199 x7155

Mobile: 805.588.4186

[www.paleowest.com](http://www.paleowest.com)

**San Diego Office**

3990 Old Town Avenue, Suite A105

San Diego, CA 92110



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<https://www.linkedin.com/company/paleowest-archaeology/>



<https://www.instagram.com/paleowest/>



<https://twitter.com/paleowest>



Virus-free. [www.avast.com](http://www.avast.com)

**From:** [Ray Teran](#)  
**To:** [Paige Kohler](#)  
**Cc:** [Ernest Pingleton](#)  
**Subject:** RE: Cultural Resources Study for the 6th at Spears Apts El Centro Project, Imperial County, CA  
**Date:** Thursday, November 3, 2022 1:59:46 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)

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The Viejas Band of Kumeyaay Indians (“Viejas”) has reviewed the proposed project and at this time we have determined that the project site has cultural significance or ties to Viejas. Cultural resources have been located within or adjacent to the APE-DE of the proposed project.

Viejas Band request that a Kumeyaay Cultural Monitor be on site for ground disturbing activities and to inform us of any new developments such as inadvertent discovery of cultural artifacts, cremation sites, or human remains.

If you wish to utilize Viejas cultural monitors (Viejas rate is \$54.15/hr. plus GSA mileage), please call Ernest Pingleton at 619-655-0410 or email, [epingleton@viejas-nsn.gov](mailto:epingleton@viejas-nsn.gov), for contracting and scheduling. Thank you.

If a Tribe, having a closer proximity to the Project, requests to perform cultural monitoring, Viejas will differ to them.

---

**From:** Paige Kohler <[pkohler@paleowest.com](mailto:pkohler@paleowest.com)>  
**Sent:** Thursday, November 3, 2022 1:50 PM  
**To:** Ray Teran <[rteran@viejas-nsn.gov](mailto:rteran@viejas-nsn.gov)>  
**Subject:** Cultural Resources Study for the 6th at Spears Apts El Centro Project, Imperial County, CA

Greetings,

Please see the attached letter and map for the Cultural Resources Study for the 6<sup>th</sup> at Spears Apts El Centro Project, in Imperial County, California.

Best,



**Paige Kohler, M.A.** | Associate Archaeologist

[pkohler@paleowest.com](mailto:pkohler@paleowest.com)

Work: 619.210.0199 x7155

Mobile: 805.588.4186

[www.paleowest.com](http://www.paleowest.com)

**San Diego Office**

3990 Old Town Avenue, Suite A105

**From:** [Lisa Cumper](#)  
**To:** [Paige Kohler](#)  
**Subject:** Re: Cultural Resources Study for the Beyer Blvd Trolley Village Project, in San Diego, San Diego County, California  
**Date:** Wednesday, November 16, 2022 9:52:30 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)

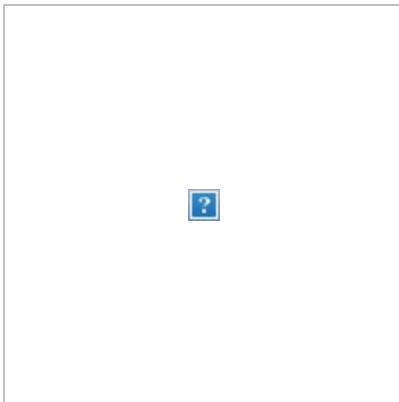
---

Hi Paige,

I've reviewed our records for this project and we can conclude consultation at this time.

Thanks,  
Lisa

*kindest Regards,*



**Lisa K. Cumper, THPO  
Tribal Historic Preservation Officer  
Cultural Resources Manager,  
The Jamul Indian Village of California  
Secretary, KCRC, Kumeyaay Nation  
Secretary, KHPC, Kumeyaay Nation**

**P.O. Box 612, Jamul CA 91935  
desk: 619.669.4855  
cell: 619.928.8689  
fax: 619.669.4817**

email: [lcumper@jiv-nsn.gov](mailto:lcumper@jiv-nsn.gov)

web: [www.jamulindianvillage.com](http://www.jamulindianvillage.com)

The ground on which we stand is sacred ground, it is the blood of our ancestors. Chief Plenty Coups,  
Crow

On Fri, Sep 30, 2022 at 11:34 AM Paige Kohler <[pkohler@paleowest.com](mailto:pkohler@paleowest.com)> wrote:

Greetings,

Please see the attached letter and map for the Cultural Resources Study for the Beyer Blvd  
Trolley Village Project, in San Diego, San Diego County, California.

Best,



**Paige Kohler, M.A.** | Associate Archaeologist

[pkohler@paleowest.com](mailto:pkohler@paleowest.com)

Work: 619.210.0199 x7155

Mobile: 619.836.5458

[www.paleowest.com](http://www.paleowest.com)

**San Diego Office**

3990 Old Town Avenue, Suite A105

San Diego, CA 92110



<https://www.facebook.com/PaleoWestUS/>



<https://www.linkedin.com/company/paleowest-archaeology/>



<https://www.instagram.com/paleowest/>



**For General Inquiries:**

T: 886.563.2536

T: 602.254.6280

info@paleowest.com

**San Diego, California**

T: 619.210.0199

3990 Old Town Avenue, Suite A105

San Diego, California 92110

pkohler@paleowest.com

