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

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National Archaeological Database (NADB) Information

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Type of Study:	Historical Resources Inventory and Evaluation
Resources:	P-37-007983, P-37-026987, NK-S-001, NK-S-002
USGS Quads:	Imperial Beach (1996), Township 18 South, Range 2 West, Section 24
Acreage:	Approximately 25 acres
Permit Numbers:	N/A
Keywords:	Chula Vista; Otay River; intensive pedestrian survey; Kumeyaay; lithic scatter; flakedstone tool; bifaces; prehistoric

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Acronyms and Abbreviations

Acronym	Definition
APE	area of potential effects
APN	Assessor's Parcel Number
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CRHR	California Register of Historical Resources
DPR	California Department of Parks and Recreation
MLD	Most Likely Descendent
NAHC	Native American Heritage Commission
NRHP	National Register of Historic Places
PRC	California Public Resources Code
project	Nakano Project
project applicant	Tri Pointe Homes
SCIC	South Coastal Information Center
SSU	shovel scrape unit
STP	shovel test pit

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Management Summary

Dudek was retained by Tri Pointe Homes (project applicant) to conduct a historical resources inventory in support of the proposed Nakano Project (project). The project proposes a residential development with supporting recreational amenities and infrastructure of approximately 25.28 acres (Figure 1, Project Location). The goal of this study is the identification and evaluation of archaeological, built environment, or tribal cultural resources (historical resources) identified within the project's area of potential effects (APE) that could be impacted by project activities. The project includes two scenarios; the Annexation Scenario with the site being annexed into the City of San Diego and the No Annexation Scenario with the site remaining in the City of Chula Vista. Both project scenarios propose the same development footprint within the same APE. This report was written so that it would satisfy both City of Chula Vista and City of San Diego regulations. The City of Chula Vista is the lead agency for the project and will assure compliance with the California Environmental Quality Act (CEQA) and local regulations. The City of San Diego is a responsible agency.

Dudek conducted a records search in February 2020 of data obtained from the South Coastal Information Center at San Diego State University (SCIC). The search encompassed the APE and a 1-mile buffer around the APE. The records search identified 52 historical resources within 1 mile of the APE, two of which intersect the APE: P-37-007983 and P-37-026987. The SCIC records search also identified 68 previous archaeological studies have been conducted within 1 mile of the APE, 12 of which cover portions of the APE.

Dudek requested a search of the Sacred Lands File from the Native American Heritage Commission (NAHC) for the project APE on February 18, 2020. The NAHC responded on March 4, 2020, indicating that the search was negative for historical resources within the project APE. Outreach letters were mailed on March 6, 2020, to all Native American group representatives included on the NAHC contact list. To date, there have been two responses to these outreach letters, but neither indicated the presence of tribal cultural resources within the project APE.

Pedestrian survey of the project APE revisited two previously identified resources and identified two new historical resources: P-37-007983, P-37-026987, NK-S-001, and NK-S-002. Archaeological evaluation testing was conducted at P-37-026987 and NK-S-002.

Dudek recommends the portion of P-37-007983 that intersects the APE not eligible for listing on the National Register of Historic Places or the California Register of Historical Resources. Dudek also recommends P-37-026987, NK-S-001, and NK-S-002 not eligible in their entirety for listing on the National Register of Historic Places or California Register of Historical Resources. Though recommended not eligible, the presence of the four historical resources within the APE increases the probability that ground disturbing activities may encounter buried historical resources. Dudek recommends the presence of an archaeological monitor and a Kumeyaay Native American monitor during initial ground disturbance for the project.

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1 Project Description and Location

Dudek was retained by Tri Pointe Homes (project applicant) to conduct a historical resources inventory in support of the proposed Nakano Project (project). The project proposes a residential development with supporting recreational amenities and infrastructure of approximately 25.28 acres (Figure 1, Project Location). The primary goal of this study is the identification and evaluation of archaeological, built environment, or tribal cultural resources (historical resources) identified within the project's area of potential effects (APE) that could be impacted by project activities. The project includes two scenarios: the Annexation Scenario with the site being annexed into the City of San Diego, and the No Annexation Scenario with the site remaining in the City of Chula Vista. Both project scenarios propose the same development footprint within the same APE. This report was written so that it would satisfy both City of Chula Vista and City of San Diego regulations. The City of Chula Vista is the lead agency for the project and will assure compliance with the California Environmental Quality Act (CEQA) and local regulations. The City of San Diego is a responsible agency and, in the event that the Annexation Scenario is pursued, would be required to also certify the CEQA document and adopt the associated measures in order to issue various discretionary approvals.

The project APE is located east of Interstate 805, northwest of Dennery Road, and south of the Otay River and is shown on Section 24 of Township 18 South, Range 2 West on the Imperial Beach U.S. Geological Survey quadrangle. The project proposes a residential development with supporting recreational amenities and infrastructure on Assessor's Parcel Number (APN) 624-071-0200. The proposed residential uses would consist of detached condo units. Recreational amenities would include a local-serving park, a regional overlook park associated with the Otay Valley Regional Park, as well as a trail connection to the Otay Valley Regional Park. To provide access to the site via Dennery Road, off-site access improvements would be required within APN 645-400-0500 located in the City of San Diego to the southwest. In addition, off-site remedial grading would be required to the northwest of the project site in the City of Chula Vista on APN 624-071-0100. An emergency only secondary access route will extend from the eastern project boundary. The current project APE includes all permanent, temporary, on-site, and off-site disturbances (Figure 2, Area of Potential Effect Map).

This report documents the results of the historical resources inventory including a records search, pedestrian survey, resource documentation, resource evaluation, and Native American participation. The goal of this inventory is to provide data to the City of Chula Vista to aid in the management of historical resources during the implementation of the project.

1.1 Regulatory Context

This project is subject to state, City of Chula Vista, and potentially the City of San Diego regulations regarding historical resources. The following section provides a summary of the applicable regulations, policies, and guidelines relating to the proper management of historical resources for this project.

1.1.1 California Register of Historical Resources (California Public Resources Code Section 5020 et seq.)

In California, the term "historical resource" includes but is not limited to "any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the

architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California" (California Public Resources Code [PRC] Section 5020.1[j]). In 1992, the California legislature established the California Register of Historical Resources (CRHR) "to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC Section 5024.1[a]). A resource is eligible for listing in the CRHR if the State Historical Resources Commission determines that it is a significant resource and that it meets any of the following National Register of Historic Places (NRHP) criteria (PRC Section 5024.1[c]):

1. Associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. 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.
4. Has yielded, or may be likely to yield, information important in prehistory or history.

Resources less than 50 years old are not considered for listing in the CRHR, but may be considered if it can be demonstrated that sufficient time has passed to understand the historical importance of the resource (see 14 CCR Section 4852[d][2]).

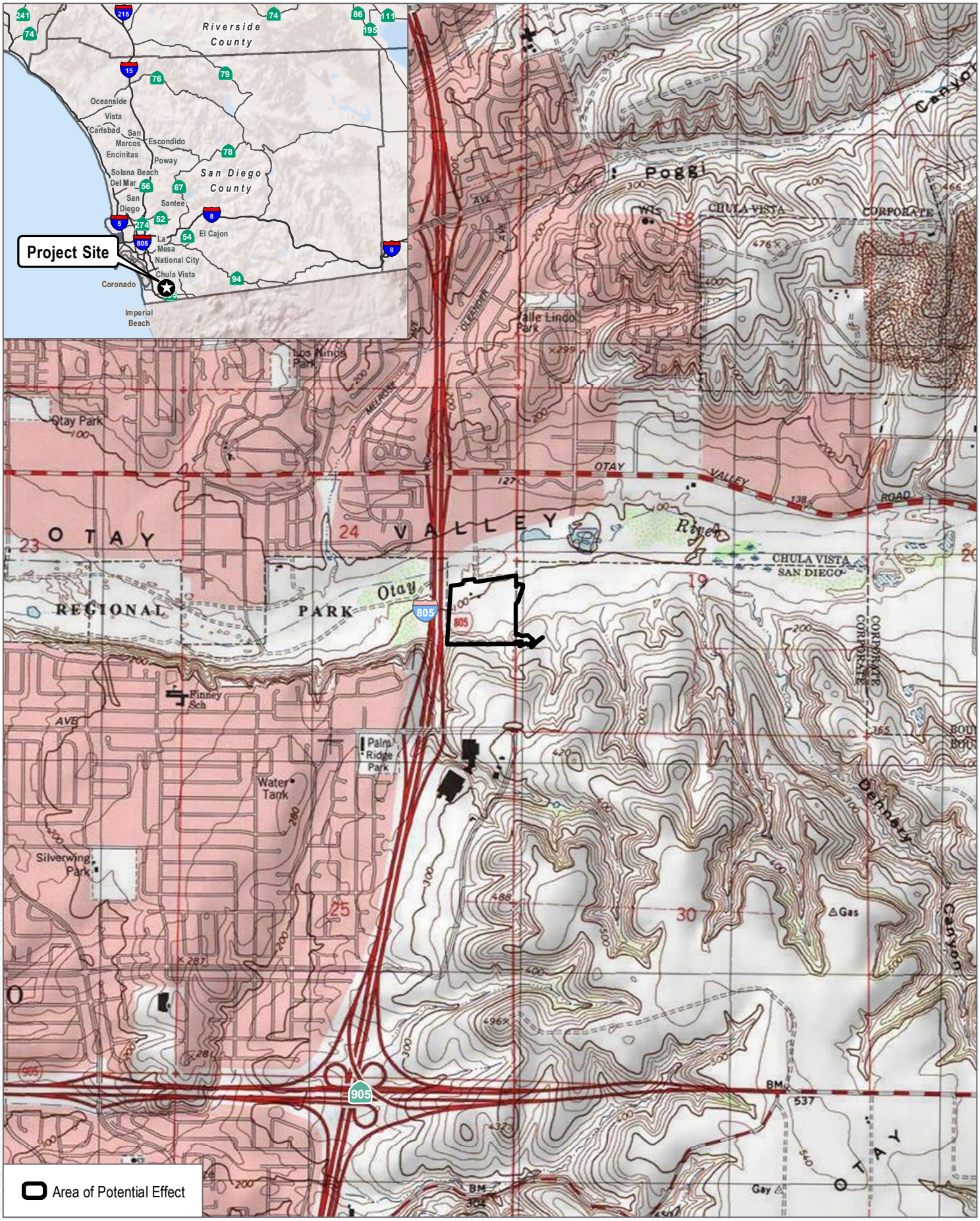
The CRHR protects historical resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the NRHP, and properties listed or formally designated as eligible for listing on the NRHP are automatically listed on the CRHR, as are the state landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys. The State Historic Preservation Office maintains the CRHR.

1.1.2 Native American Historic Cultural Sites (California Public Resources Code Section 5097 et seq.)

The Native American Historic Resources Protection Act (PRC Section 5097, et seq.) addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and establishes the Native American Heritage Commission (NAHC) to resolve disputes regarding the disposition of such remains. In addition, the Native American Historic Resource Protection Act makes it a misdemeanor punishable by up to 1 year in jail to deface or destroy an Indian historic or cultural site that is listed or may be eligible for listing in the CRHR.

1.1.3 California Native American Graves Protection and Repatriation Act

The California Native American Graves Protection and Repatriation Act (California Repatriation Act), enacted in 2001, requires all state agencies and museums that receive state funding and that have possession or control over collections of human remains or cultural items, as defined, to complete an inventory and summary of these remains and items on or before January 1, 2003, with certain exceptions. The California Repatriation Act also provides a process for the identification and repatriation of these items to the appropriate tribes.



SOURCE: USGS 7.5-Minute Series Imperial Beach Quadrangle

0 300 600 Meters

0 1,000 2,000 Feet

DUDEK

FIGURE 1

Project Location

Nakano

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SOURCE: SANGIS 2019; Civil Sense 2022

DUDEK

0 100 200 Feet

FIGURE 2

Area of Potential Effect Map

Nakano

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1.1.4 California Health and Safety Code Section 7050.5

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. California Health and Safety Code Section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the County coroner has examined the remains (California Health and Safety Code, Section 7050.5b). If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact the NAHC within 24 hours (California Health and Safety Code, Section 7050.5c). The NAHC will notify the Most Likely Descendent (MLD). With the permission of the landowner, the MLD may inspect the site of discovery. The inspection must be completed within 24 hours of notification of the MLD by the NAHC. The MLD may recommend means of treating or disposing of, with appropriate dignity, the human remains and items associated with Native Americans.

1.1.5 California Environmental Quality Act

As described further below, the following CEQA statutes and CEQA Guidelines are relevant to the analysis of archaeological and historic resources:

1. PRC Section 21083.2(g): Defines "unique archaeological resource."
2. PRC Section 21084.1 and CEQA Guidelines Section 15064.5(a): Defines historical resources. In addition, CEQA Guidelines Section 15064.5(b) defines the phrase "substantial adverse change" in the significance of a historical resource. It also defines the circumstances when a project would materially impair the significance of a historical resource.
3. PRC Section 21074 (a): defines "Tribal cultural resources" and Section 21074(b): defines a "cultural landscape."
4. PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e): These statutes set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated ceremony.
5. PRC Sections 21083.2(b)-(c) and CEQA Guidelines Section 15126.4: These statutes and regulations provide information regarding the mitigation framework for archaeological and historic resources, including options of preservation-in-place mitigation measures; identifies preservation-in-place as the preferred manner of mitigating impacts to significant archaeological sites.

Under CEQA, a project may have a significant effect on the environment if it may cause "a substantial adverse change in the significance of a [sic] historical resource" (PRC Section 21084.1; CEQA Guidelines Section 15064.5[b]). A "historical resource" is any site listed or eligible for listing in the CRHR. The CRHR listing criteria are intended to examine whether the resource in question: (a) is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage; (b) is associated with the lives of persons important in our past; (c) embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or (d) has yielded, or may be likely to yield, information important in pre-history or history.

The term "historical resource" also includes any site described in a local register of historic resources, or identified as significant in a historical resources survey (meeting the requirements of PRC Section 5024.1[q]).

CEQA also applies to "unique archaeological resources." PRC Section 21083.2(g) defines a "unique archaeological resource" as any archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

In 2014, CEQA was amended through Assembly Bill 52 to apply to "tribal culture resources" as well. Specifically, PRC Section 21074 provides guidance for defining tribal cultural resources as either of the following:

1. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following: (A) Included or determined to be eligible for inclusion in the California Register of Historical Resources. (B) Included in a local register of historical resources as defined in subdivision (k) of §5020.1.
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of §5024.1. In applying the criteria set forth in subdivision (c) of §5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe. (b) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

All historical resources and unique archaeological resources – as defined by statute – are presumed to be historically or culturally significant for purposes of CEQA (PRC Section 21084.1; 14 CCR 15064.5[a]). The lead agency is not precluded from determining that a resource is a historical resource even if it does not fall within this presumption (PRC Section 21084.1; 14 CCR 15064.5[a]). A site or resource that does not meet the definition of "historical resource" or "unique archaeological resource" is not considered significant under CEQA and need not be analyzed further (PRC Section 21083.2[a]; 14 CCR 15064.5[c][4]).

Under CEQA and significant cultural impact results from a "substantial adverse change in the significance of an [sic] historical resource [including a unique archaeological resource]" due to the "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired" (14 CCR 15064.5[b][1]; PRC Section 5020.1[q]). In turn, the significance of a historical resource is materially impaired when a project does any of the following (14 CCR 15064.5[b][2]):

1. Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
2. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, unless the public agency

reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

3. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a lead agency for purposes of CEQA.

Pursuant to these sections, the CEQA first evaluates evaluating whether a project site contains any "historical resources," then assesses whether that project will cause a substantial adverse change in the significance of a historical resource such that the resource's historical significance is materially impaired.

When a project significantly affects a unique archaeological resource, CEQA imposes special mitigation requirements. Specifically, PRC Sections 21083.2(b)(1)–21083.2(b)(4) states the following:

> [i]f it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts to be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. Examples of that treatment, in no order of preference, may include, but are not limited to, any of the following:
>
> 1. Planning construction to avoid archaeological sites.
> 2. Deeding archaeological sites into permanent conservation easements.
> 3. Capping or covering archaeological sites with a layer of soil before building on the sites.
> 4. Planning parks, greenspace, or other open space to incorporate archaeological sites.

If these "preservation in place" options are not feasible, mitigation may be accomplished through data recovery (PRC Section 21083.2[d]; 14 CCR 15126.4[b][3][C]). PRC Section 21083.2(d) states the following:

> Excavation as mitigation shall be restricted to those parts of the unique archaeological resource that would be damaged or destroyed by the project. Excavation as mitigation shall not be required for a unique archaeological resource if the lead agency determines that testing or studies already completed have adequately recovered the scientifically consequential information from and about the resource, if this determination is documented in the environmental impact report.

These same requirements are set forth in slightly greater detail in CEQA Guidelines Section 15126.4(b)(3), as follows:

A. Preservation in place is the preferred manner of mitigating impacts to archaeological sites. Preservation in place maintains the relationship between artifacts and the archaeological context. Preservation may also avoid conflict with religious or cultural values of groups associated with the site.
B. Preservation in place may be accomplished by, but is not limited to, the following:
    1. Planning construction to avoid archaeological sites;
    2. Incorporation of sites within parks, greenspace, or other open space;
    3. Covering the archaeological sites with a layer of chemically stable soil before building tennis courts, parking lots, or similar facilities on the site[; and]
    4. Deeding the site into a permanent conservation easement.

C. When data recovery through excavation is the only feasible mitigation, a data recovery plan, which makes provision for adequately recovering the scientifically consequential information from and about the historical resource, shall be prepared and adopted prior to any excavation being undertaken.

When conducting data recovery, "[i]f an artifact must be removed during project excavation or testing, curation may be an appropriate mitigation" (14 CCR 15126.4[b][3]). However, "[d]ata recovery shall not be required for an historical resource if the lead agency determines that testing or studies already completed have adequately recovered the scientifically consequential information from and about the archaeological or historic resource, provided that determination is documented in the EIR [environmental impact report] and that the studies are deposited with the California Historical Resources Regional Information Center" (14 CCR 15126.4[b][3][D]).

Finally, CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. These procedures are set forth in PRC Section 5097.98.

1.1.6 Senate Bill No. 18

Senate Bill 18 amended Section 65351 of the Government Code and dictates the following:

> During the preparation or amendment of the general plan, the planning agency shall provide opportunities for the involvement of citizens California Native American Indian tribes, public agencies, public utility companies, and civic, education, and other community groups, through public hearings and any other means the city or county deems appropriate.

1.1.7 Assembly Bill 52

Assembly Bill (AB) 52 of 2014 amended PRC Section 5097.94 and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. AB 52 established that Tribal Cultural Resources (TCRs) must be considered under CEQA and also provided for additional Native American consultation requirements for the lead agency. Section 21074 describes a TCR as a site, feature, place, cultural landscape, sacred place, or object that is considered of cultural value to a California Native American Tribe and that is either:

- On or determined to be eligible for the CRHR or a local historic register; or
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1.

AB 52 formalizes the lead agency–tribal consultation process, requiring the lead agency to initiate consultation with California Native American groups that are traditionally and culturally affiliated with the project site, including tribes that may not be federally recognized. Lead agencies are required to begin consultation prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report.

Section 1 (a)(9) of AB 52 establishes that "a substantial adverse change to a tribal cultural resource has a significant effect on the environment." Effects on TCRs should be considered under CEQA. Section 6 of AB 52 adds Section 21080.3.2 to the PRC, which states that parties may propose mitigation measures "capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource." Further, if a California Native American tribe

requests consultation regarding project alternatives, mitigation measures, or significant effects to tribal cultural resources, the consultation shall include those topics (PRC Section 21080.3.2[a]). The environmental document and the mitigation monitoring and reporting program (where applicable) shall include any mitigation measures that are adopted (PRC Section 21082.3[a]).

1.1.8 Chula Vista Historic Preservation Ordinance

The Historic Preservation Ordinance, as dictated in Chula Vista Municipal Code (Title 21), declares that the identification, recognition, preservation, protection and adaptive reuse of Historical Resources are essential for the health, prosperity, social and cultural enrichment, and general welfare of the citizens who live in, work and visit Chula Vista. The purpose and intent of the Historic Preservation Ordinance is to serve, protect and enhance the public health, safety and welfare through the following:

A. Serve as the regulatory document of the City's Historic Preservation Program (HPP);
B. Promote and accomplish the historic preservation goals, policies, and strategies of the City's General Plan;
C. Promote the recognition, preservation, protection and use of Historical Resources through Historical Resource surveys and the designation of Historical Resources:
D. Preserve and enhance those Historical Resources that give Chula Vista its identity by utilizing the Secretary of Interior Standards for Treatment of Historic Properties;
E. Honor Chula Vista's rich history and heritage by designating significant Historical Resources and Historic Preservation Districts that are associated with important historical events, persons, significant architecture, and landscape elements;
F. Provide strong and safe neighborhoods by encouraging harmony as to style, form, proportion, and material between Historical Resources and new construction that are located within designated Historic Preservation Districts;
G. Provide for a sustainable environment through the preservation and protection of Resources and neighborhoods that have Historical Significance;
H. Carry out the provisions of the National Historic Preservation Act and the Certified Local Government Program established under said act;
I. Establish the use of incentives and benefits for the protection, retention and preservation of Historical Resources; and
J. Promote the recognition, preservation, protection and use of Historical Resources through education and a HPP that is maintained up to date and valid.

Chapter 21.04.100 states that designation of historical resources by the Historic Preservation Commission may occur when the following findings of fact are made:

A. A Resource is at least 45 years old; and
B. A Resource possesses historical Integrity defined under Chula Vista Municipal Code §21.03.084 and the Resource is determined to have historical significance by meeting at least one of the following criteria:

   Criterion 1: It is associated with an event that is important to prehistory or history on a national, state, regional, or local level.

   Criterion 2: It is associated with a person or persons that have made significant contributions to prehistory or history on a national, state or local level.

Criterion 3: It embodies that distinctive characteristics of a style, type, period, or method of construction, or represents the work of a master or important, creative individual, and/or possesses high artistic values.

Criterion 4: It is an outstanding example of a publicly owned Historical Landscape, that represents the work of a master landscape architect, horticulturalist, or landscape designer, or a publicly owned Historical Landscape that has potential to provide important information to the further study of landscape architecture or history.

Criterion 5: It has yielded, or may be likely to yield information important in prehistory or the history of Chula Vista, the state, region, or nation.

1.1.9 City of San Diego Significance Determination Thresholds

The City of San Diego implements its California Environmental Quality Act Significance Determination Thresholds (City of San Diego 2016) to assess whether a proposed project may have a significant effect on the environment under Section 21082.2 of CEQA. The Initial Study Checklist Questions and Significance Thresholds are described below.

Initial Study Checklist Questions

1. An alteration, including the adverse physical or aesthetic effects and/or the destruction of a prehistoric or historic building (including an architecturally significant building), structure, or object or site?
2. Any impact to existing religious or sacred uses within the potential impact area?
3. The disturbance of any human remains, including those interred outside of formal cemeteries?

Significance Thresholds

Federal, state, and local criteria have been established for the determination of historical resource significance. The Historical Resources Regulations of the Land Development Code pertain only to historical resources that meet the definitions contained in Chapter 11, Article 3, Division 1 of the code and may differ from the definition of historical resources in these Guidelines and from a determination of significance under CEQA.

1.1.10 City of San Diego Historical Resources Regulations

The Historical Resources Regulations of the Land Development Code (Chapter 14, Article 3, Division 2) states the following:

> The purpose of these regulations is to protect, preserve and, where damaged, restore the historical resources of San Diego, which include historical buildings, historical structures or historical objects, important archaeological sites, historical districts, historical landscapes, and traditional cultural properties. These regulations are intended to assure that development occurs in a manner that protects the overall quality of historical resources. It is further the intent of these regulations to protect the educational, cultural, economic, and general welfare of the public, while employing regulations that are consistent with sound historical preservation principles and the rights of private property owners.

The City of San Diego's General Plan Program Environmental Impact Report states the following (City of San Diego 2008):

> The Historical Resources Regulations require that designated historical resources and traditional cultural properties be preserved unless deviation findings can be made by the decision maker as part of a discretionary permit. Minor alterations consistent with the U.S. Secretary of the Interior's Standards are exempt from the requirement to obtain a separate permit but must comply with the regulations and associated historical resources guidelines. Limited development may encroach into important archaeological sites if adequate mitigation measures are provided as a condition of approval.

Section 143.0212 of the Historical Resources Regulations dictates the need for site-specific survey and to determine the presence of historical resources. Should the City Manager determine that a site-specific survey is require, that survey would be conducted consistent with the Historical Resources Guidelines of the Land Development Manual.

The City of San Diego Historical Resources Guidelines (City of San Diego 2001) outlines its purpose as follows:

> The purpose of this document is to provide property owners, the development community, consultants and the general public with explicit guidelines for the management of historical resources located within the jurisdiction of the City of San Diego. These guidelines are designed to implement the City's Historical Resources Regulations contained in the Land Development Code (Chapter 14, Division 3, Article 2) in compliance with applicable local, state and federal policies and mandates, including, but not limited to, the City's Progress Guide and General Plan, the California Environmental Quality Act of 1970, and Section 106 of the National Historic Preservation Act of 1966. The intent of the guidelines is to ensure consistency in the management of the City's historical resources, including identification, evaluation, preservation/mitigation and development.

The City of San Diego's Historical Resources Guidelines (City of San Diego 2001) observe the following:

> Historical resources include all properties (historic, archaeological, landscapes, traditional, etc.) eligible or potentially eligible for the National Register of Historic Places, as well as those that may be significant pursuant to state and local laws and registration programs such as the California Register of Historical Resources or the City of San Diego Historical Resources Register. 'Historical resource' means site improvements, buildings, structures, historic districts, signs, features (including significant trees or other landscaping), places, place names, interior elements and fixtures designated in conjunction with a property, or other objects of historical, archaeological, scientific, educational, cultural, architectural, aesthetic, or traditional significance to the citizens of the City. They include buildings, structures, objects, archaeological sites, districts or landscapes possessing physical evidence of human activities that are typically over 45 years old, regardless of whether they have been altered or continue to be used. Historical resources also include traditional cultural properties.

In general, the City of San Diego's Historical Resources Regulations build on federal and state historical resources laws and guidelines in an attempt to streamline the process of considering impacts to historical resources within the City of San Diego's jurisdiction, while maintaining that some resources not significant under federal or state law may be considered historical under the City of San Diego's guidelines. To apply the criteria and determine the

significance of potential project impacts to a historical resource, the APE of that project must be defined for both direct impacts and indirect impacts. Indirect impacts can include increased public access to an archaeological site, or visual impairment of a historically significant view shed related to a historic building or structure.

1.2 Project Personnel

Matthew DeCarlo, MA, served as project manager and Principal Investigator, field director, and co-authored the technical report (Appendix A). Micah Hale, PhD, RPA, co-authored the technical report. Dudek archaeologist Tom Sowles and Red Tail Environmental Native American monitor Nate Curo participated in the field survey. Dudek archaeologists David Faith and Javier Hernandez participated in the evaluation testing and were accompanied by Red Tail Environmental Native American monitor Anthony LaChappa.

1.3 Report Structure

Following this introduction, a cultural and environmental context is provided for characterizing historical resources. The cultural context includes results of the records search and Sacred Lands File search. The research design is then described followed by a review of the inventory, excavation, and laboratory methods. A description of the survey and excavation results follows. An analysis of excavated materials is then presented followed by evaluation recommendations and management considerations. Two sets of appendices (confidential and non-confidential) are attached. The non-confidential appendices are Appendix A, Project Personnel Qualifications; Appendix C, NAHC Sacred Lands File Search Results and Tribal Correspondence; and Appendix F, Artifact Catalog. The confidential appendices are Appendix B, SCIC Records Search Results; Appendix D, New DPR Site Records; and Appendix E, Resources in APE Location Map.

2 Setting

2.1 Natural Setting

The project APE consists largely of an open flat field bordered by hills in the south and east, though a portion of the APE extends onto the southern hillsides. The elevated Interstate 805 borders the western side of the APE and Otay River borders the northern side. The field has been previously used for agriculture and several structure foundations suggest that several buildings were previously present. The elevations in the project APE range from approximately 100 feet above mean sea level in the northwest of the project APE near Interstate 805 to approximately 200 feet above mean sea level in the southeast corner of the off-site project area along Dennery Road.

For detailed discussion relating to the environmental context of this area, please consult the other technical studies prepared for the project.

2.2 Cultural Setting

Evidence for continuous human occupation in the San Diego region spans the last 10,000 years. Various attempts to parse out variability in archaeological assemblages over this broad time frame have led to the development of several cultural chronologies; some of these are based on geologic time, most are based on temporal trends in archaeological assemblages, and others are interpretive reconstructions. Each of these reconstructions describes essentially similar trends in assemblage composition in more or less detail. This research employs a common set of generalized terms used to describe chronological trends in assemblage composition: Paleoindian (pre-5500 BC), Archaic (8000 BC–AD 500), Late Prehistoric (AD 500–1769), and Ethnohistoric (post-AD 1769).

2.2.1 Paleoindian (pre-5500 BC)

Evidence for Paleoindian occupation in coastal Southern California is tenuous, especially considering the fact that the oldest dated archaeological assemblages look nothing like the Paleoindian artifacts from the Great Basin. One of the earliest dated archaeological assemblages in coastal Southern California (excluding the Channel Islands) derives from SDI-4669/W-12, in La Jolla. A human burial from SDI-4669 was radiocarbon dated to 9,590–9,920 years before present (95.4% probability) (Hector 2007). The burial is part of a larger site complex that contained more than 29 human burials associated with an assemblage that fits the Archaic profile (i.e., large amounts of groundstone, battered cobbles, and expedient flake tools). In contrast, typical Paleoindian assemblages include large stemmed projectile points, high proportions of formal lithic tools, bifacial lithic reduction strategies, and relatively small proportions of groundstone tools. Prime examples of this pattern are sites that were studied by Emma Lou Davis (1978) on China Lake Naval Air Weapons Station near Ridgecrest, California. These sites contained fluted and unfluted stemmed points and large numbers of formal flake tools (e.g., shaped scrapers, blades). Other typical Paleoindian sites include the Komodo site (MNO-679)—a multicomponent fluted point site, and MNO-680—a single component Great Basined Stemmed point site (Basgall et al. 2002). At MNO-679 and MNO-680, groundstone tools were rare while finely made projectile points were common.

Turning back to coastal Southern California, the fact that some of the earliest dated assemblages are dominated by processing tools runs counter to traditional notions of mobile hunter–gatherers traversing the landscape for

highly valued prey. Evidence for the latter—that is, typical Paleoindian assemblages—may have been located along the coastal margin at one time, prior to glacial desiccation and a rapid rise in sea level during the early Holocene (pre-7500 BP) that submerged as much as 1.8 kilometers of the San Diego coastline. If this were true, however, it would also be expected that such sites would be located on older landforms near the current coastline. Some sites, such as SDI-210 along Agua Hedionda Lagoon, contained stemmed points similar in form to Silver Lake and Lake Mojave projectile points (pre-8000 BP) that are commonly found at sites in California's high desert (Basgall and Hall 1990). SDI-210 yielded one corrected radiocarbon date of 8520–9520 BP (Warren et al. 2004). However, sites of this nature are extremely rare and cannot be separated from large numbers of milling tools that intermingle with old projectile point forms.

Warren et al. (2004) claimed that a biface manufacturing tradition present at the Harris site complex (SDI-149) is representative of typical Paleoindian occupation in the San Diego region that possibly dates between 10,365 and 8200 BC (Warren et al. 2004, p. 26). Termed San Dieguito (Rogers 1945), assemblages at the Harris site are qualitatively distinct from most others in the San Diego region because the site has large numbers of finely made bifaces (including projectile points), formal flake tools, a biface reduction trajectory, and relatively small amounts of processing tools (Warren 1964, 1968). Despite the unique assemblage composition, the definition of San Dieguito as a separate cultural tradition is hotly debated. Gallegos (1987) suggested that the San Dieguito pattern is simply an inland manifestation of a broader economic pattern. Gallegos' interpretation of San Dieguito has been widely accepted in recent years, in part because of the difficulty in distinguishing San Dieguito components from other assemblage constituents. In other words, it is easier to ignore San Dieguito as a distinct socioeconomic pattern than it is to draw it out of mixed assemblages.

The large number of finished bifaces (i.e., projectile points and non-projectile blades), along with large numbers of formal flake tools at the Harris site complex, is very different than nearly all other assemblages throughout the San Diego region, regardless of age. Warren et al. (2004) made this point, tabulating basic assemblage constituents for key early Holocene sites. Producing finely made bifaces and formal flake tools implies that relatively large amounts of time were spent for tool manufacture. Such a strategy contrasts with the expedient flake-based tools and cobble-core reduction strategy that typifies non-San Dieguito Archaic sites. It can be inferred from the uniquely high degree of San Dieguito assemblage formality that the Harris site complex represents a distinct economic strategy from non-San Dieguito assemblages.

If San Dieguito truly represents a distinct socioeconomic strategy from the non-San Dieguito Archaic processing regime, its rarity implies that it was not only short-lived, but that it was not as economically successful as the Archaic strategy. Such a conclusion would fit with other trends in southern California deserts, wherein hunting-related tools are replaced by processing tools during the early Holocene (Basgall and Hall 1990).

2.2.2 Archaic (8000 BC–AD 500)

The more than 1,500-year overlap between the presumed age of Paleoindian occupations and the Archaic period highlights the difficulty in defining a cultural chronology in the San Diego region. If San Dieguito is the only recognized Paleoindian component in the San Diego region, then the dominance of hunting tools implies that it derives from Great Basin adaptive strategies and is not necessarily a local adaptation. Warren et al. (2004) admitted as much, citing strong desert connections with San Dieguito. Thus, the Archaic pattern is the earliest local socioeconomic adaptation in the San Diego region (Hale 2001, 2009).

The Archaic pattern is relatively easy to define with assemblages that consist primarily of processing tools: millingstones, handstones, battered cobbles, heavy crude scrapers, incipient flake-based tools, and cobble-core

reduction. These assemblages occur in all environments across the San Diego region, with little variability in tool composition. Low assemblage variability over time and space among Archaic sites has been equated with cultural conservatism (Byrd and Reddy 2002; Warren 1968; Warren et al. 2004). Despite enormous amounts of archaeological work at Archaic sites, little change in assemblage composition occurs until the bow and arrow is adopted at around AD 500, as well as ceramics at approximately the same time (Griset 1996; Hale 2009). Even then, assemblage formality remains low. After the bow is adopted, small arrow points appear in large quantities and already low amounts of formal flake tools are replaced by increasing amounts of expedient flake tools. Similarly, shaped millingstones and handstones decrease in proportion relative to expedient, unshaped groundstone tools (Hale 2009). Thus, the terminus of the Archaic period is equally as hard to define as its beginning because basic assemblage constituents and patterns of manufacturing investment remain stable, complimented only by the addition of the bow and ceramics.

2.2.3 Late Prehistoric (AD 500–1769)

The period of time following the Archaic and prior to Ethnohistoric times (AD 1769) is commonly referred to as the Late Prehistoric (Rogers 1945; Wallace 1955; Warren et al. 2004). However, several other subdivisions continue to be used to describe various shifts in assemblage composition, including the addition of ceramics and cremation practices. In northern San Diego County, the post-AD 1450 period is called the San Luis Rey Complex (True 1980), while the same period in southern San Diego County is called the Cuyamaca Complex and is thought to extend from AD 500 until Ethnohistoric times (Meighan 1959). Rogers (1929) also subdivided the last 1,000 years into the Yuman II and III cultures, based on the distribution of ceramics. Despite these regional complexes, each is defined by the addition of arrow points and ceramics, and the widespread use of bedrock mortars. Vagaries in the appearance of the bow and arrow and ceramics make the temporal resolution of the San Luis Rey and Cuyamaca complexes difficult. For this reason, the term Late Prehistoric is well-suited to describe the last 1,500 years of prehistory in the San Diego region.

Temporal trends in socioeconomic adaptations during the Late Prehistoric period are poorly understood. This is partly due to the fact that the fundamental Late Prehistoric assemblage is very similar to the Archaic pattern, but includes arrow points and large quantities of fine debitage from producing arrow points, ceramics, and cremations. The appearance of mortars and pestles is difficult to place in time because most mortars are on bedrock surfaces; bowl mortars are actually rare in the San Diego region. Some argue that the Ethnohistoric intensive acorn economy extends as far back as AD 500 (Bean and Shipek 1978). However, there is no substantial evidence that reliance on acorns, and the accompanying use of mortars and pestles, occurred prior to AD 1400. True (1980) argued that acorn processing and ceramic use in the northern San Diego region did not occur until the San Luis Rey pattern emerged after approximately AD 1450. For southern San Diego County, the picture is less clear. The Cuyamaca Complex is the southern counterpart to the San Luis Rey pattern, however, and is most recognizable after AD 1450 (Hector 1984). Similar to True (1980), Hale (2009) argued that an acorn economy did not appear in the southern San Diego region until just prior to Ethnohistoric times, and that when it did occur, a major shift in social organization followed.

2.2.4 Ethnohistoric (post-AD 1769)

The history of the Native American communities prior to the mid-1700s has largely been reconstructed through later mission-period and early ethnographic accounts. The first records of the Native American inhabitants of the San Diego region come predominantly from European merchants, missionaries, military personnel, and explorers. These brief, and generally peripheral, accounts were prepared with the intent of furthering respective colonial and

economic aims and were combined with observations of the landscape. They were not intended to be unbiased accounts regarding the cultural structures and community practices of the newly encountered cultural groups. The establishment of the missions in the San Diego region brought more extensive documentation of Native American communities, though these groups did not become the focus of formal and in-depth ethnographic study until the early twentieth century (Boscana 1846; Fages 1937; Geiger and Meighan 1976; Harrington 1934; Laylander 2000). The principal intent of these researchers was to record the precontact, culturally specific practices, ideologies, and languages that had survived the destabilizing effects of missionization and colonialism. This research, often understood as "salvage ethnography," was driven by the understanding that traditional knowledge was being lost due to the impacts of modernization and cultural assimilation. Alfred Kroeber applied his "memory culture" approach (Lightfoot 2005, p. 32) by recording languages and oral histories within the San Diego region. Kroeber's 1925 assessment of the impacts of Spanish missionization on local Native American populations supported Kumeyaay traditional cultural continuity (Kroeber 1925, p. 711):

> San Diego was the first mission founded in upper California; but the geographical limits of its influence were the narrowest of any, and its effects on the natives comparatively light. There seem to be two reasons for this: first, the stubbornly resisting temper of the natives; and second, a failure of the rigorous concentration policy enforced elsewhere.

In some ways this interpretation led to the belief that many California Native American groups simply escaped the harmful effects of contact and colonization all together. This, of course, is untrue. Ethnographic research by Dubois, Kroeber, Harrington, Spier, and others during the early twentieth century seemed to indicate that traditional cultural practices and beliefs survived among local Native American communities. These accounts supported, and were supported by, previous governmental decisions which made San Diego County the location of more federally recognized tribes than anywhere else in the United States: 18 tribes on 18 reservations that cover more than 116,000 acres (CSP 2009).

The traditional cultural boundaries between the Luiseño and Kumeyaay Native American tribal groups have been well defined by anthropologist Florence C. Shipek (Shipek 1993, as summarized in County of San Diego 2007, p. 6):

> In 1769, the Kumeyaay national territory started at the coast about 100 miles south of the Mexican border (below Santo Tomas), thence north to the coast at the drainage divide south of the San Luis Rey River including its tributaries. Using the U.S. Geological Survey topographic maps, the boundary with the Luiseño then follows that divide inland. The boundary continues on the divide separating Valley Center from Escondido and then up along Bear Ridge to the 2240 contour line and then north across the divide between Valley Center and Woods Valley up to the 1880-foot peak, then curving around east along the divide above Woods Valley.

Based on ethnographic information, it is believed that at least 88 different languages were spoken from Baja California Sur to the southern Oregon state border at the time of Spanish contact (Johnson and Lorenz 2006, p. 34). The distribution of recorded Native American languages has been dispersed as a geographic mosaic across California through six primary language families (Golla 2007, p. 71). Based on the project location, the Native American inhabitants of the region would have likely spoken both the Ipai and Tipai language subgroup of the Yuman language group. Ipai and Tipai, spoken respectively by the northern and southern Kumeyaay communities, are mutually intelligible. For this reason, these two are often treated as dialects of a larger Kumeyaay tribal group rather than as distinctive languages, though this has been debated (Laylander 2010; Luomala 1978).

Victor Golla has contended that one can interpret the amount of variability within specific language groups as being associated with the relative "time depth" of the speaking populations (Golla 2007, p. 80) A large amount of variation within the language of a group represents a greater time depth then a group's language with less internal diversity. One method that he has employed is by drawing comparisons with historically documented changes in Germanic and Romantic language groups. Golla has observed that the "absolute chronology of the internal diversification within a language family" can be correlated with archaeological dates (Golla 2007, p. 71). This type of interpretation is modeled on concepts of genetic drift and gene flows that are associated with migration and population isolation in the biological sciences.

Golla suggested that there are two language families associated with Native American groups who traditionally lived throughout the San Diego County region. The northern San Diego tribes have traditionally spoken Takic languages that may be assigned to the larger Uto–Aztecan family (Golla 2007, p. 74). These groups include the Luiseño, Cupeño, and Cahuilla. Golla has interpreted the amount of internal diversity within these language-speaking communities to reflect a time depth of approximately 2,000 years. Other researchers have contended that Takic may have diverged from Uto–Aztecan ca. 2600 BC–AD 1, which was later followed by the diversification within the Takic speaking San Diego tribes, occurring approximately 1500 BC–AD 1000 (Laylander 2010). The majority of Native American tribal groups in southern San Diego region have traditionally spoken Yuman languages, a subgroup of the Hokan Phylum. Golla has suggested that the time depth of Hokan is approximately 8,000 years (Golla 2007, p. 74). The Kumeyaay tribal communities share a common language group with the Cocopa, Quechan, Maricopa, Mojave, and others to east, and the Kiliwa to the south. The time depth for both the Ipai (north of the San Diego River, from Escondido to Lake Henshaw) and the Tipai (south of the San Diego River, the Laguna Mountains through Ensenada) is approximated to be 2,000 years at the most. Laylander has contended that previous research indicates a divergence between Ipai and Tipai to have occurred approximately AD 600–1200 (Laylander 1985). Despite the distinct linguistic differences between the Takic-speaking tribes to the north, the Ipai-speaking communities in central San Diego, and the Tipai southern Kumeyaay, attempts to illustrate the distinctions between these groups based solely on cultural material alone have had only limited success (Pigniolo 2004; True 1966).

The Kumeyaay generally lived in smaller family subgroups that would inhabit two or more locations over the course of the year. While less common, there is sufficient evidence that there were also permanently occupied villages, and that some members may have remained at these locations throughout the year (Owen 1965; Shipek 1982, 1985; Spier 1923). Each autonomous triblet was internally socially stratified, commonly including higher status individuals such as a tribal head (Kwaaypay), shaman (Kuseyaay), and general members with various responsibilities and skills (Shipek 1982). Higher-status individuals tended to have greater rights to land resources, and owned more goods, such as shell money and beads, decorative items, and clothing. To some degree, titles were passed along family lines; however, tangible goods were generally ceremonially burned or destroyed following the deaths of their owners (Luomala 1978). Remains were cremated over a pyre and then relocated to a cremation ceramic vessel that was placed in a removed or hidden location. A broken metate was commonly placed at the location of the cremated remains, with the intent of providing aid and further use after death. At maturity, tribal members often left to other bands to find a partner. The families formed networks of communication and exchange around such partnerships.

Areas or regions, identified by known physical landmarks, could be recognized as band-specific territories that might be violently defended against use by other members of the Kumeyaay. Other areas or resources, such as water sources and other locations that were rich in natural resources, were generally understood as communal land to be shared amongst all the Kumeyaay (Luomala 1978). The coastal Kumeyaay exchanged a number of local goods, such as seafood, coastal plants, and various types of shell for items including acorns, agave,

mesquite beans, gourds, and other more interior plants of use (Luomala 1978). Shellfish would have been procured from three primary environments, including the sandy open coast, bay and lagoon, and rocky open coast. The availability of these marine resources changed with the rising sea levels, siltation of lagoon and bay environments, changing climatic conditions, and intensity of use by humans and animals (Gallegos and Kyle 1988; Pigniolo 2005; Warren 1964). Shellfish from sandy environments included *Donax*, *Saxidomus*, *Tivela*, and others. Rocky coast shellfish dietary contributions consisted of *Pseudochama*, *Megastraea*, *Saxidomus*, *Protothaca*, *Megathura*, *Mytilus*, and others. Lastly, the bay environment would have provided *Argopecten*, *Chione*, *Ostrea*, *Neverita*, *Macoma*, *Tagelus*, and others. Although marine resources were obviously consumed, terrestrial animals and other resources likely provided a large portion of sustenance. Game animals consisted of rabbits, hares (Leporidae), birds, ground squirrels, woodrats (*Neotoma* sp.), deer, bears, mountain lions (*Puma concolor*), bobcats (*Lynx rufus*), coyotes (*Canis latrans*), and others. In lesser numbers, reptiles and amphibians may have been consumed.

A number of local plants were used for food and medicine. These were exploited seasonally, and were both traded between regional groups and gathered as a single triblet moved between habitation areas. Some of the more common of these that might have been procured locally or as higher elevation varieties would have included buckwheat (*Eriogonum fasciculatum*), *Agave*, *Yucca*, lemonade sumac (*Rhus integrifolia*), sugarbush (*Rhus ovata*), sage scrub (*Artemisia californica*), yerba santa (*Eriodictyon* sp.), sage (*Salvia* sp.), *Ephedra*, prickly pear (*Opuntia* sp.), mulefat (*Baccharis salicifolia*), chamise (*Adenostoma fasciculatum*), elderberry (*Sambucus nigra*), oak (*Quercus* sp.), willow (*Salix* sp.), and *Juncus* grass among many others (Wilken 2012).

2.2.5 Historic Period (post-AD 1542)

History of the greater San Diego area can be divided into the Spanish Period (1769–1821), Mexican Period (1821–1846) and American Period (1846–Present). European activity in the region began as early as AD 1542, when Juan Rodríguez Cabrillo landed in San Diego Bay. Sebastián Vizcaíno returned in 1602, and it is possible that there were subsequent contacts that went unrecorded. These brief encounters made the local native people aware of the existence of other cultures that were technologically more complex than their own. Epidemic diseases may also have been introduced into the region at an early date, either by direct contacts with the infrequent European visitors or through waves of diffusion emanating from native peoples farther to the east or south (Preston 2002). It is possible, but as yet unproven, that the precipitous demographic decline of native peoples had already begun prior to the arrival of Gaspar de Portolá and Junípero Serra in 1769.

The Spanish colonization of Alta California began in 1769 with the founding of Mission San Diego de Alcalá by Father Junípero Serra. Concerns over Russian and English interests in California motivated the Spanish government to send an expedition of soldiers, settlers and missionaries to occupy and secure the northwestern borderlands of New Spain through the establishment of a Presidio, Mission, and Pueblo. The Spanish explorers first camped on the shore of the bay in the area that is now downtown San Diego. Lack of water at this location, however, led to moving the camp on May 14, 1769, to a small hill closer to the San Diego River and near the Kumeyaay village of Cosoy. Father Junípero Serra arrived in July of the same year to find the Presidio serving mostly as a hospital. The Spanish built a primitive mission and presidio structure on the hill near the river.

Bad feelings soon developed between the native Kumeyaay and the soldiers, resulting in construction of a stockade which, by 1772, included barracks for the soldiers, a storehouse for supplies, a house for the missionaries and the chapel, which had been improved. The log and brush huts were gradually replaced with

buildings made of adobe bricks. Flat earthen roofs were eventually replaced by pitched roofs with rounded roof tiles. Clay floors were eventually lined with fired brick.

In August, 1774 the Spanish missionaries moved the Mission San Diego de Alcalá to its present location 6 miles up the San Diego River valley (modern Mission Valley) near the Kumeyaay village of Nipaguay. Begun as a thatched chapel and compound built of willow poles, logs and tules, the new Mission was sacked and burned in the Kumeyaay uprising of November 5, 1775. The first adobe chapel was completed in October 1776 and the present church was begun the following year. A succession of building programs through 1813 resulted in the final rectilinear plan that included the church, bell tower, sacristy, courtyard, residential complex, workshops, corrals, gardens and cemetery. Orchards, reservoirs and other agricultural installations were built to the south on the lower San Diego River alluvial terrace and were irrigated by a dam and aqueduct system. The initial Spanish occupation and mission system brought about profound changes in the lives of the Kumeyaay people. Substantial numbers of the coastal Kumeyaay were forcibly brought into the mission or died from introduced diseases.

As early as 1791, presidio commandants in California were given the authority to grant small house lots and garden plots to soldiers and their families and sometime after 1800, soldiers and their families began to move down the hill near the San Diego River. Historian William Smythe noted that Don Blas Aguilar, who was born in 1811, remembered at least 15 such grants below Presidio Hill by 1821, of which only five of these grant lands within the boundaries of what would become Old Town had houses in 1821. These included the retired commandant Francisco Ruiz Adobe (now known as the Carrillo Adobe), another building later owned by Henry Fitch on Calhoun Street, the Ybanes and Serrano houses on Juan Street near Washington Street, and a small adobe house on the main plaza owned by Juan Jose Maria Marron.

In 1822, the political situation changed as Mexico won its independence from Spain and San Diego became part of the Mexican Republic. The Mexican Government opened California to foreign trade; began issuing private land grants in the early 1820s, creating the rancho system of large agricultural estates; secularized the Spanish missions in 1833; and oversaw the rise of the civilian pueblo. By 1827, as many as 30 homes existed around the central plaza and in 1835, Mexico granted San Diego official pueblo (town) status. At this time the town had a population of nearly 500 residents, later reaching a peak of roughly 600. By 1835, the presidio, once the center of life in Spanish San Diego, had been abandoned and lay in ruins. Mission San Diego de Alcalá fared little better. The town and the ship landing area at La Playa were now the centers of activity in Mexican San Diego. However, the new Pueblo of San Diego did not prosper as did some other California towns during the Mexican Period.

The secularization in San Diego County triggered increased Native American hostilities against the Californios during the late 1830s. The attacks on outlying ranchos, along with unstable political and economic factors helped San Diego's population decline to around 150 permanent residents by 1840. San Diego's official Pueblo status was removed by 1838 and it was made a subprefecture of the Los Angeles Pueblo. When the Americans took over after 1846, the situation had stabilized somewhat, and the population had increased to roughly 350 non-Native American residents. The Native American population continued to decline, as Mexican occupation brought about continued displacement and acculturation of Native American populations.

The American Period began in 1846 when United States military forces occupied San Diego and this period continues today. When United States military forces occupied San Diego in July 1846, the town's residents split on their course of action. Many of the town's leaders sided with the Americans, while other prominent families opposed the United States invasion. In December 1846, a group of Californios under Andres Pico engaged United States Army forces under General Stephen Kearney at the Battle of San Pasqual and inflicted many casualties. However, the Californio resistance was defeated in two small battles near Los Angeles and effectively ended by

January 1847. The Americans assumed formal control with the Treaty of Guadalupe-Hidalgo in 1848 and introduced Anglo culture and society, American political institutions and especially American entrepreneurial commerce. In 1850, the Americanization of San Diego began to develop rapidly.

On February 18, 1850, the California State Legislature formally organized San Diego County. The first elections were held at San Diego and La Playa on April 1, 1850, for county officers. San Diego grew slowly during the next decade. San Diegans attempted to develop the town's interests through a transcontinental railroad plan and the development of a new town closer to the bay. The failure of these plans, added to a severe drought which crippled ranching and the onset of the Civil War, left San Diego as a remote frontier town. The troubles led to an actual drop in the town's population from 650 in 1850 to 539 in 1860. Not until land speculator and developer Alonzo Horton arrived in 1867 did San Diego begin to develop fully into an active American town.

Alonzo Horton's development of a New San Diego (modern downtown) in 1867 began to swing the community focus away from Old Town and began the urbanization of San Diego. Expansion of trade brought an increase in the availability of building materials. Wood buildings gradually replaced adobe structures. Some of the earliest buildings to be erected in the American Period were "pre-fab" houses that were built on the east coast of the United States and shipped in sections around Cape Horn and reassembled in San Diego. Development spread from downtown based on a variety of factors, including the availability of potable water and transportation corridors. Factors such as views and access to public facilities affected land values, which in turn affected the character of neighborhoods that developed. During the Victorian Era of the late 1800s and early 1900s, the areas of Golden Hill, Uptown, Banker's Hill and Sherman Heights were developed. Examples of the Victorian Era architectural styles remain in these communities, as well as in Little Italy, which developed at the same time. At the time downtown was being built, there began to be summer cottage/retreat development in what are now the Beach communities and La Jolla area. The early structures in these areas were not of substantial construction; they were primarily for temporary vacation housing.

Development also spread to the Greater North Park and Mission Hills areas during the early 1900s. The neighborhoods were built as small lots, a single lot at a time; there was not large tract housing development of those neighborhoods. It provided affordable housing away from the downtown area, and development expanded as transportation improved. Barrio Logan began as a residential area, but because of proximity to rail freight and shipping freight docks, the area became more mixed with conversion to industrial uses. This area was more suitable to industrial uses because land values were not as high; topographically the area is more level, and it is not as interesting in terms of views as are the areas north of downtown. Various ethnic groups settled in the area because of the availability of land ownership.

San Ysidro began to be developed at about the turn of the twentieth century. The early settlers were followers of the Littlelanders movement. There, the pattern of development was designed to accommodate small plots of land for each homeowner to farm as part of a farming-residential cooperative community. Nearby Otay Mesa-Nestor began to be developed by farmers of Germanic and Swiss background. Some of the prime citrus groves in California were in the Otay Mesa-Nestor area; in addition, there were grape growers of Italian heritage who settled in the Otay River Valley and tributary canyons and produced wine for commercial purposes.

San Diego State University was established in the 1920s; development of the state college area began then and the development of the Navajo community was outgrowth from the college area and from the west. There was farming and ranching in Mission Valley until the middle portion of the twentieth century, when the uses were converted to commercial and residential. There were dairy farms and chicken ranches adjacent to the San Diego River where now there are motels, restaurants, office complexes and regional shopping malls. There was little

development north of the San Diego River until Linda Vista was developed as military housing in the 1940s. The federal government improved public facilities and extended water and sewer pipelines to the area. From Linda Vista, development spread north of Mission Valley to the Clairemont Mesa and Kearny Mesa areas. Development in these communities was mixed use and residential on moderate size lots.

Tierrasanta, previously owned by the United States Navy, was developed in the 1970s. It was one of the first planned unit developments with segregation of uses. Tierrasanta and many of the communities that have developed since, such as Rancho Peñasquitos and Rancho Bernardo, represent the typical development pattern in San Diego in the last 25 to 30 years: uses are well segregated, with commercial uses located along the main thoroughfares and the residential uses located in between. Industrial uses are located in planned industrial parks. Examples of every major period and style remain. Among the recognized styles in San Diego are Spanish Colonial, Pre-Railroad New England, National Vernacular, Victorian Italianate, Stick, Queen Anne, Colonial Revival, Neoclassical, Shingle, Folk Victorian, Mission, Craftsman, Prairie, French Eclectic, Italian Renaissance, Spanish Eclectic, Egyptian Revival, Tudor Revival, Modernistic and International.

2.3 South Coastal Information Center Records Search

An examination of existing maps, records, and reports was conducted by Dudek to determine if the project could potentially impact previously recorded historical resources. Dudek conducted a records search in February 2020 of data obtained from the South Coastal Information Center at San Diego State University. The search encompassed the APE and a 1-mile buffer around the APE. The purpose of the records search is to identify any previously recorded resources that may be located in or adjacent to the project APE and to identify previous studies in the project vicinity. In addition to a review of previously prepared site records and reports, the records search also reviewed historical maps of the project APE, ethnographies, the NRHP, the CRHR, the California Historic Property Data File, and the lists of California State Historical Landmarks, California Points of Historical Interest, and Archaeological Determinations of Eligibility.

Historical Resources

The records search identified 52 historical resources within 1 mile of the APE (Table 1; see also Confidential Appendix B). The prehistoric sites within 1 mile of the APE include 24 artifact scatters, five shell scatters, two lithic workshops, a temporary camp, and 16 isolated artifacts. Historic-period sites include three buildings. One multicomponent site, a winery, was also identified within 1 mile of the APE. Of the 52 historical resources identified within 1 mile of the APE, two historical resources, P-37-007983 and P-37-026987, intersect the APE.

Table 1. Previously Recorded Resources within 1 Mile of APE

Label	Trinomial	Era	Description	Intersects
P-37-000761	CA-SDI-000761	Prehistoric	Artifact scatter	No
P-37-004639	CA-SDI-004639	Prehistoric	Lithic artifact scatter	No
P-37-006699	CA-SDI-006699	Prehistoric	Artifact scatter	No
P-37-007604	CA-SDI-007604	Prehistoric	Lithic scatter	No
P-37-007983	CA-SDI-007983	Prehistoric	Artifact scatter	Yes
P-37-007985	CA-SDI-007985	Prehistoric	Lithic scatter	No
P-37-008065	CA-SDI-008065	Prehistoric	Lithic and shell scatter	No
P-37-008912	CA-SDI-008912	Prehistoric	Milling and lithic artifact scatter	No

Table 1. Previously Recorded Resources within 1 Mile of APE

Label	Trinomial	Era	Description	Intersects
P-37-010055	CA-SDI-010055	Prehistoric	Lithic scatter	No
P-37-010056	CA-SDI-010056	Prehistoric	Isolated flake	No
P-37-010057	CA-SDI-010057	Prehistoric	Lithic scatter	No
P-37-010058	CA-SDI-010058	Prehistoric	Lithic artifact scatter	No
P-37-010059	CA-SDI-010059	Prehistoric	Lithic scatter	No
P-37-010060	CA-SDI-010060	Multicomponent	Daneri Winery	No
P-37-010199	CA-SDI-010199	Prehistoric	Lithic scatter	No
P-37-010202	CA-SDI-010202	Prehistoric	Lithic workstation	No
P-37-010203	CA-SDI-010203	Prehistoric	Artifact scatter	No
P-37-010204	CA-SDI-010204	Prehistoric	Artifact scatter	No
P-37-010205	CA-SDI-010205	Prehistoric	Lithic workstation	No
P-37-010210	CA-SDI-010210	Prehistoric	Temporary camp	No
P-37-010472	CA-SDI-010472	Prehistoric	Lithic scatter	No
P-37-010489	CA-SDI-010489	Prehistoric	Lithic scatter	No
P-37-010739	CA-SDI-010739	Prehistoric	Lithic and shell scatter	No
P-37-011822	CA-SDI-011822	Prehistoric	Lithic scatter	No
P-37-011944	CA-SDI-011944	Prehistoric	Lithic scatter	No
P-37-014739		Prehistoric	Isolated two lithic tools	No
P-37-014791		Prehistoric	Isolated lithic tool	No
P-37-014792		Prehistoric	Isolated lithic core	No
P-37-014793		Prehistoric	Isolated flake	No
P-37-014794		Prehistoric	Isolated flake	No
P-37-014795		Prehistoric	Isolated flake	No
P-37-014796		Prehistoric	Isolated lithic core	No
P-37-014801		Prehistoric	Isolated lithic tool	No
P-37-015975		Prehistoric	Isolated lithic flake	No
P-37-019024	CA-SDI-013719	Prehistoric	Lithic and shell scatter	No
P-37-025521		Historical	Farmhouse	No
P-37-026987	CA-SDI-017668	Prehistoric	Lithic and shell scatter	Yes
P-37-031356		Prehistoric	Isolated flake and shell fragment	No
P-37-031357		Prehistoric	Isolated flake	No
P-37-031358		Prehistoric	Isolated flake and two shell fragments	No
P-37-031360		Prehistoric	Isolated two shell fragments	No
P-37-031369	CA-SDI-019917	Prehistoric	Shell scatter	No
P-37-031370	CA-SDI-019918	Prehistoric	Shell scatter	No
P-37-031371	CA-SDI-019919	Prehistoric	Shell scatter	No
P-37-031372	CA-SDI-019920	Prehistoric	Shell scatter	No
P-37-031373	CA-SDI-019921	Prehistoric	Shell scatter	No
P-37-034152	CA-SDI-021362	Prehistoric	Lithic artifact scatter	No
P-37-034473		Prehistoric	Isolated flake	No
P-37-034474		Prehistoric	Isolated flake	No
P-37-035092		Historical	Building	No
P-37-035093		Historical	Church	No
P-37-036628	CA-SDI-22124	Prehistoric	Lithic scatter	No

P-37-007983; CA-SDI-7983

This resource is a widespread prehistoric artifacts scatter consisting of lithic flakes, debitage, cores, scrapers, hammerstones, handstones, and shell. The site was originally recorded in 1979 by L. McCoy and subsequently updated in 1984, 1988, 1990, 2010, and 2018. The recorded site boundary expands over 50 acres. The site has been disturbed by off-road vehicles and the southern portion of the site, Locus A, was completely destroyed by the construction of the Kaiser Permanente building in 1998. Locus A, the southern portion of the site, was previously evaluated in 1987 (RBR & Associates 1987) and 1990 with shovel test pits (STPs) and no subsurface deposits were identified. The northwestern portion of the site, Locus B, which intersects the current project APE, was never tested. A survey identified surface artifacts in the northwestern portion of the site (Locus B) in 2010.

P-37-026987; CA-SDI-17668

This resource is a low density lithic scatter and shell deposit identified in 2005. The debitage is composed of dark and greenish-grey volcanic materials. The site measures approximately 22 by 10 meters, but the bulk of the lithic material is concentrated within a six meter area. The eastern portion of this site was tested in 2005 and found to have no buried deposits (Mooney, Jones, and Stokes 2005). This portion of the site was recommended not eligible for listing on the NRHP.

Previous Cultural Studies

The South Coastal Information Center (SCIC) records search also identified 68 previous archaeological studies have been conducted within 1 mile of the APE, 12 of which cover portions of the APE (see Confidential Appendix B). Two of these reports describe historical resources identified within the current project APE.

SD-9765

RBR & Associates conducted historical resources significance testing of 21 archaeological sites for the California Terraces Project in 1985 and 1986 (RBR & Associates 1987). One of these sites, P-37-007983, intersects the southern boundary of the current project APE. Only the southern portion of the site, Locus A, was tested and revealed no subsurface deposit. Locus A of P-37-007983 was recommend not significant. Locus B, the portion of P-37-007983 located within the current APE, was not tested and a significance evaluation was not conducted.

SD-10448

Mooney, Jones & Stokes conducted a site significance evaluation testing of P-37-026987 in preparation of the construction of a pipeline in 2005 (Mooney, Jones, and Stokes 2005). Because the pipeline only bisected the eastern portion of the site, only this portion of the site was tested and evaluated. Field work consisted of a 100% surface collection, three backhoe excavated trenches, and one hand dug 1- by 1-meter control unit. The results included limited lithic debitage and ground stone tools, but no datable materials were identified. The results indicated possible artifact redeposition. Mooney, Jones & Stokes recommended the eastern portion of P-37-0026987 not eligible for listing in the NRHP.

2.4 NAHC Sacred Lands File Search

Dudek requested a search of the Sacred Lands File from the NAHC for the project APE on February 18, 2020 (Appendix C). A search of this type requires NAHC staff to review their list for the presence of Native American

sites, which are organized spatially based on a Public Land Survey System section grid (measuring 1 square mile). The NAHC responded on March 4, 2020, via letter indicating that the search was negative for historical resources within the project APE. Additionally, the NAHC response letter included a list of Native American group representatives who should be contacted for information about these sites.

Outreach letters were mailed on March 6, 2020, to all Native American group representatives included on the NAHC contact list (Appendix C). These letters attempt to solicit additional information relating to Tribal Cultural Resources that may be affected by the project. Native American representatives were requested to define a general area where known resources intersect the project APE. This will help guide communications with tribal groups and representatives that maintain specific traditional associations with particular sectional of the project APE. To date, there have been two responses to these outreach letters.

On March 17, 2020, Lisa Cumper, Tribal Historic Preservation Officer, called Dudek archaeologist Matthew DeCarlo to discuss the project. After explaining the project area and the known historical resources in the area, Ms. Cumper asked to be on the distribution list. On March 18, 2020, the San Pasqual Band of Mission Indians responded via a letter. They stated that the project APE fell within the tribes Traditional Use Area and would like to be informed of project updates. Neither tribal contact indicated the presence of tribal cultural resources within the project APE.

Under CEQA, the lead agency is required to perform formal government-to-government consultation with Native American Tribes under Assembly Bill 52 and Senate Bill 18.

3 Research Design

While innumerable concepts and theoretical perspectives have been used to interpret archaeological findings in the San Diego region, several broad themes can be outlined that generally guide interpretations. These themes include site formation processes, chronology, settlement and site function, and subsistence. The research themes are designed to provide information that can be used to direct evaluation with the goal of determining NRHP/CRHR eligibility.

3.1 Site Formation Processes

Prehistoric sites vary in complexity and duration of use, and both social and natural factors contribute to the formation and composition of their deposits. The nature of site occupation (e.g., food procurement and/or processing, other types of resource procurement, social events, and short-term or seasonal occupation) can lead to spatial patterning of artifacts, food remains, and site features.

Post-depositional processes can alter the character of prehistoric sites. Bioturbation, erosion, alluvial deposition, and historic and modern land use can affect the integrity of prehistoric archaeological sites. These disturbances complicate archaeological interpretation, particularly of complex, multicomponent sites. To the extent that site integrity enhances or deflates the interpretive potential of a cultural deposit, it may contribute to or detract from its scientific value:

- Do inclusive chronometric data from project sites permit the identification and definition of temporally and/or spatially discrete prehistoric occupations?
- Are the definitions of discrete components supported by multiple, independent chronological controls, and if so, how similar are their age estimates?
- Is there substantial evidence of occupational "overprinting"? How has this affected the temporal integrity of habitation components or refuse deposits?
- What kinds of impacts are affecting or have affected sites in different parts of the study area, and how extensive are they?
- Have adverse impacts affected the data potential of each evaluated site?

3.2 Chronology and Dating

Chronological issues are basic to any archaeological research design, as they provide the primary framework of prehistory. Previous research in the southern San Diego region has documented a range of prehistoric sites dating to both the Archaic (6000 BC to AD 500) and Late Prehistoric periods (post-AD 500). To the southeast near Jamul, Yohe and Chace (1995) documented a late-La Jollan (i.e., Millingstone) deposit dominated by millingstones, handstones, cobble tools, and other items. In the eastern foothills and valley floors near Otay Mesa, a strong record that postdates AD 1000 has been documented (McDonald et al. 1993; Hale 2009). In all, sites that date to the last 1,000 years can have assemblages with large numbers of arrow points, small flake-based tools, and ceramics, but also include sizeable amounts of millingstones and handstones relative to mortars and pestles. The distribution of such artifacts is uneven at many sites in the southern San Diego region and there may be temporal patterning in how sites were occupied, leaving differential traces of assemblage constituents. Along these lines, potential research issues derived from this basic problem include the following:

- How did the transition from the Archaic period to the Late Prehistoric period occur?

This transition was characterized by shifts in food storage and cooking technology with the inception of ceramics, and possibly by a shift in hunting technology with the addition of the bow and arrow. These shifts did not occur simultaneously (McDonald et al. 1993), and their implications for local population expansion in the Late Prehistoric period are unknown.

- Was there a shift in emphasis of acorn use during the Late Prehistoric period?

The mortar and pestle appear to have been added to the repertoire of food processing tools during the Late Prehistoric period, but only in small numbers. Is there evidence for earlier use of bedrock mortars? Is the addition of the mortar and pestle correlated to the inception of ceramics in the region and/or intensified use of a particular resource?

Because chronological controls are essential to any archaeological investigation, several other basic questions concerning the temporal data potential of evaluated sites pertain to the current study, including the following:

- Can the chronological placement of project sites be determined?
- What kinds of chronometric data can project sites provide? Of those obtained, how well do they correlate in terms of the age estimates they provide (e.g., projectile point types versus obsidian hydration dates).
- Do marker artifacts appear to fit with temporal patterns recognized in the surrounding region? Are there any unique, temporally diagnostic items present?
- Can chronometric data from project sites help to refine dating schemes in the local region?

The possibility that cultural deposits from project sites are related to occupation of the ethnographic village of La Punta makes these questions even more important. The presence of aboriginal ceramics is often taken as a signal of post-AD 1400 occupation (Hale 2009) but ceramics have been in use in southern San Diego County for most of the last 1,500 years. Thus, the presence of ceramics at the current set of project sites does not necessarily mean that they derive from an ethnohistoric occupation identified by the Spanish in 1782. As such, evaluation of the project sites must corroborate time-sensitive artifacts with radiocarbon dates in strong stratigraphic contexts.

3.3 Settlement and Site Function

The Late Prehistoric is a time when significant shifts in settlement and subsistence may have occurred. While several important prehistoric sites and ethnohistoric villages are known for the local area, the character of settlement and subsistence shifts has not been fully explored. A key variable in understanding social organization during this time is to determine the kinds of socioeconomic shifts that occurred after adoption of the bow and arrow and the subsequent widespread use of ceramics. The current set of project sites may have the potential to generate important data for addressing this issue, particularly the presence of arrow points and abundant amounts of pottery. Specific data requirements include information on arrow-point manufacture, general patterns of lithic reduction, and raw material use—including exotic stone. Was arrow-point production occurring at sites in the project area, or were they discarded in exhausted condition? What does the debitage assemblage imply about the production and/or maintenance of stone tools at project sites?

Information on ceramic vessel form, function, and the diversity therein is also critical for determining whether residential occupation was brief or prolonged. How many kinds of vessels are indicated in the assemblage and for what purposes were they used? The latter is particularly important for understanding intensification in the exploitation of plant foods (Eerkens 2001). Is there evidence, in the form of clay daub and other manufacturing

tools, that clay vessels were being manufactured at sites in the project area? Can food residues be obtained from ceramic artifacts recovered during evaluation?

The manufacture and use of groundstone implements can help clarify the nature of site occupation and settlement duration. Shaping of handstones and pestles can be an indication that populations are somewhat mobile, implying use in off-site contexts—the idea being that shaping can reduce mass thereby reducing transport costs (Hale 2001).

The term "village" evokes a sense of residential permanency, and, if a site is assumed to be a village, such an assumption can predicate the kinds of questions asked during an archaeological investigation. Alternatively, an investigation can test the assumption by asking questions about the archaeological record. If the project sites are related to permanent village occupation, what is the subsistence toolkit expected to look like, given that stone raw material is not very abundant in the immediately available riverine deposits? Additionally, what is the faunal and floral profile expected to look like for a relatively permanent settlement of people? These are questions that can and should be developed and addressed during an evaluation.

3.4 Subsistence

Subsistence orientation and settlement patterns are interwoven and dependent on the availability of resources, together creating a system of decisions regarding settlement locations, desired faunal and vegetal resources, seasonal movements, food processing techniques, and storage habits. Subsistence strategies of the Kumeyaay have been described as bipolar, but dependent upon where the lineage home area was located. In reality though, most subsistence strategies were much more complex, and can be described as systems of "fission and fusion." In such a system, what is expected of subsistence during periods of fusion, when multiple families congregate in a common area, as may be the case for the current project sites? Are resources pooled among families, or is there evidence of privatization in the form of cache pits or storage containers within individual habitations?

Milling implements are common across San Diego County, and both macroscopic and microscopic vegetal remains (primarily seeds) may be present as residues on these kinds of tools and in the site matrix. Several questions that can be addressed using data from project sites are: What vegetal and faunal remains are present? How specialized was the subsistence strategy (i.e., were any species a focus of exploitation)? In particular, what role did acorns play versus small seeds and tubers or fish? What types of "exotic" food resources are present? Can seasonal and/or diachronic changes be discerned in the subsistence emphasis? If diachronic change is detected, can this be related to technological changes such as the introduction of ceramics, arrow points, and the mortar and pestle?

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4 Methods

The purpose of this study was to compile an inventory of all resources within the project APE to determine possible impacts to historical resources and potential effects to historical resources. To complete this study, a review of all known resources and the identification of any new resources were necessary. Resources identified within the APE were recorded and analyzed. Any resources that may have possessed subsurface deposits that would make the site eligible for the NRHP or CRHR was archaeologically tested.

4.1 Survey

The survey of the project APE was conducted on March 9, 2020. The APE is located in an open, flat field bordered by hills in the south and east, though a portion of the APE extends onto the southern hillsides. The project APE was surveyed using a combination of north/south transects at 15-meter intervals. In this manner, all portions of traversable land was subject to pedestrian survey. The southern portion of the APE is located on a hillside that is steep and presented a safety risk. This portion of the APE was not systematically surveyed but the survey team did survey any leveled terraces on the hillside. The lower field was so densely vegetated that ground visibility was completely obscured except for cleared dirt roads.

An iPad Air with georeferenced project maps and GPS capabilities was used to aid surveying and site recordation. Records of sites previously identified within the APE were loaded onto the iPad for field reference. Field work was conducted under the supervision of Dudek archaeologist Matthew DeCarlo. Tom Sowles participated in the survey as an archaeologist and Nate Curo of Red Tail Monitoring and Research participated in the survey as the Native American monitor.

Documentation of historical resources complied with the Office of Historic Preservation and Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation (48 FR 44716–44740) and the California Office of Historic Preservation Planning Bulletin Number 4(a). All sites identified during this inventory were recorded on California Department of Parks and Recreation (DPR) Form DPR 523 (Series 1/95), using the Instructions for Recording Historical Resources (Office of Historic Preservation 1995). New site forms are included in Confidential Appendix D and will be submitted to the South Coastal Information Center.

4.2 Excavation

While the evaluation strategy varied slightly based on the conditions encountered at each evaluated site, the same basic methods were employed. Sites were evaluated using close-interval survey, STPs, and shovel scrape units (SSUs). STPs are 0.5 meters by 0.25 meters, excavated in 20-centimeter levels. SSUs measure 1 meter by 2 meters and range in depth from 3 to 10 centimeters to investigate what is immediately under the ground surface. All hand-excavated soils were screened through 1/8 inch (3-millimeter) mesh. All excavated units were backfilled at the conclusion of the unit's excavation.

Photographs of each unit profile were recorded to documented soils and disturbances. A Trimble GeoXT-6000 GPS unit was used to record the locations of excavation units. Field notes were recorded on standardized forms to log artifact recovery, soil descriptions, disturbances, and any other pertinent information.

4.3 Laboratory and Cataloging Procedures

Initial laboratory procedures included cleaning (as appropriate), sorting, and cataloging of all artifacts and ecofacts. Each item was individually examined and cataloged according to class, subclass, and material; counted; and weighed on a digital scale. All coded data were entered into a Microsoft Access database. Data manipulation of a coded master catalog combining all sites was performed in Microsoft Excel.

The cultural material was sorted during cataloging into the following potential categories: 13 classes of prehistoric artifacts; 2 classes of ecofacts; ethnohistoric items, historic items, and modern items; and organic samples. The prehistoric artifact classes potentially included debitage, cores, utilized core tools, modified core tools, utilized flakes, retouched flakes, bifaces, percussing tools, groundstone, ceramics, bone artifacts, shell artifacts, and miscellaneous items.

Debitage, including both flakes and debris, was sorted by material type and cortical variation (primary, secondary, and interior) during cataloging. Maximum length, width, and thickness measurements were taken for all tools and cores using a sliding caliper.

Groundstone artifacts would have been classified by type, including millingstones and handstones. Maximum length, width, and thickness measurements would have been taken on complete groundstone items. No organic artifact classes (ecofacts) were identified.

Once preliminary cataloging of the material was completed, more detailed attribute analysis of lithics was performed. Flake stone artifacts were individually analyzed for selected morphological and technological attributes, as well as material and condition, in an attempt to gain insight into the period of occupation and the range of activities undertaken. Specific analytical methods are described in the analytical results section. All artifacts were subject to appropriate conservation in the field and laboratory, including proper packaging and handling.

4.4 Curation

All artifacts collected during archaeological testing for this study (Section 5.2, Archaeological Testing Results) will be curated at the San Diego Archaeological Center. Any artifacts collected as part of future archaeological studies, or confiscated from looters, should also be curated so that the materials are preserved for the benefit of the general public and for archaeologists for future study. Proper curation of collected artifacts (and other materials, including documentation) can contribute to any mitigation to offset impacts to archaeological sites.

5 Results

5.1 Survey Results

The pedestrian survey of the project APE included the revisiting of two previously identified resources and the identification of two new historical resources (Table 2, Historical Resources within the Project APE) (Confidential Appendix E).

Table 2. Historical Resources within the Project APE

Site Number	Trinomial	Era	Description	Previous NRHP/ CRHR Status
P-37-007983	CA-SDI-7983	Prehistoric	Artifact Scatter	Unevaluated in APE
P-37-026987	CA-SDI-17668	Prehistoric	Lithic and shell scatter	Unevaluated in APE
NK-S-001	—	Historical	Foundations	Unevaluated
NK-S-002	—	Prehistoric	Lithic scatter	Unevaluated

APE = area of potential effects; NRHP = National Register of Historic Places; CRHR = California Register of Historical Resources

5.1.1 Previously Identified Historical Resources

P-37-007983; CA-SDI-7983

This resource consists of a widespread prehistoric artifacts scatter consisting of lithic flakes, debitage, cores, scrapers, hammerstones, handstones, and shell. The southern portion of the site, Locus A, was completely destroyed with the construction of the Kaiser Permanente building in 1998. A 2010 survey identified surface artifacts in the northwestern portion of the site (Locus B), which includes the southern portion of the project APE.

The current study revisited the northwestern portion of P-37-007983 that is located within the project APE. This portion of the project APE consists of very steep hills. The only level portions of P-37-007983 within the project APE consists of a leveled dirt road and transmission tower pads graded into the hillside. A pedestrian survey of these terraces did not identify any cultural materials. Due to the steepness of the hillside and the disturbance of the access road and transmission tower pads, it is unlikely that any cultural materials from P-37-007983 were present within the current project APE.

P-37-026987; CA-SDI-17668

This resource consists of a low-density lithic scatter and shell deposit identified in 2005. The eastern portion of this site was tested in 2005 and found to have no buried deposits. The 2005 evaluation of this site also collected all surface artifacts. The current study revisited P-37-026987 and resurveyed the mapped site boundary using close interval transects. No cultural materials or features were identified.

5.1.2 Newly Identified Historical Resources

NK-S-001

The current study identified the remains of a historic-era agricultural complex within the project APE. The remains consist of four concrete foundations. The structures that were once supported by these foundations have been completely removed and there are no associated artifacts. The platforms are currently covered with graffiti and modern refuse. Review of historic aerial photographs show that Foundation 2 was built between 1968 and 1971. The other three foundations were built after 1971.

NK-S-002

The current study identified a prehistoric lithic scatter within the project APE. The scatter is located in a flat field with dense, dry vegetation and a dirt road traveling east to west through it. Due to the dense vegetation, artifacts were only visible in the dirt road. During the initial survey, Dudek identified 18 volcanic flakes, one volcanic core fragment, and two bifaces.

5.2 Archaeological Testing Results

The current study identified four historical resources within the project APE. One site, P-37-007983, only intersects the southern boundary of the project APE. This portion of the mapped site boundary that intersects the APE is located on a steep hillside with shallow bedrock. No surface artifacts were identified, and the likelihood of buried deposits on this steep hillside are extremely low. Another site, NK-S-001, consists of concrete foundations from structures built in the late 1960 or early 1970s and removed in 2004. Because it is unlikely that archaeological testing at either of these sites would have identified buried deposits that would produce information about prehistory or history, excavation at these two site would not have contributed to determining the eligibility of these sites for listing on the NRHP or the CRHR. The remaining two sites within the project APE, P-37-026987 and NK-S-002, did have the potential for buried deposits and were archaeologically tested to gather information to determine the eligibility of these sites for listing on the NRHP or the CRHR.

P-37-026987; CA-SDI-17668

The eastern portion of P-37-026987 was previously tested in 2005 and found to have no buried deposits. This portion of the site was recommended not eligible for listing on the NRHP. No recommendation was made for the western portion of the site. Dudek reviewed the site record and found that the site was reported to measure 22 by 10 meters; however, as mapped on the site record and the SCIC GIS files, the site is projected to be 90 meters in diameter. Rather than test the entire misrepresented site, Dudek archaeologists revisited P-37-026987 on June 24, 2020, to conducted archaeological testing at the reported center of the small site. The reported boundary of the entire site was surveyed using transects at less than 5-meter intervals. No cultural materials or features were identified on the surface. To determine the presence of a subsurface deposit, one STP was excavated at the recorded center of the 22- by 10-meter resource. The STP was excavated to a depth of 40 centimeters. The soils consisted of a dry sandy loam that was homogenous in profile. The homogenous sediments are the result of previous agricultural activities. STP-01 produced no cultural materials and was abandoned at a depth of 40 centimeters.

NK-S-002

Dudek archaeologists revisited NK-S-002 and conducted excavations on July 24, 2020. The previously recorded site boundary was resurveyed using transects at less than 1-meter intervals. Only seven volcanic lithic debitage fragments were identified on the surface. The lithic tools identified during Dudek's initial survey on March 9, 2020, two bifaces and a core, could not be relocated. It is possible that these easily identifiable resources were illegally collected. No other artifact types were identified. To determine the presence of a subsurface deposit, four STPs and one SSU were excavated. Three STPs were placed in the dirt road where the surface artifacts were identified, one STP was placed eight meters south of the dirt road, and the SSU was placed eight meters north of the road, as shown on the DPR form in Confidential Appendix D. The four STPs were excavated to a depth ranging from 40 to 60 centimeters. STPs were abandoned when artifact productivity diminished. The surface and subsurface artifact assemblage consisted solely of lithic debitage (Appendix F). Table 3 summarizes the resource yield from each of the four STPs. STP-01 was the most productive unit. SSU-01 measured 2 meters by 1 meter and was excavated to a depth of 5 centimeters. SSU-01 only produced four debitage fragments. The sediments revealed by all units consisted of homogenous sandy loam with no stratigraphy. This suggest that the sediments were greatly disturbed by previous agricultural activities.

Table 3. NK-S-002 STP Yield

STP	Surface	0–20 cm	20–40 cm	40–60 cm
STP-01	1	8	7	4
STP-02	0	5	4	—
STP-03	0	3	4	1 (at 50 cm)
STP-04	0	2	0	—

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6 Management Considerations

6.1 Resource Evaluation

The current study identified four historical resources that are located within the project APE that could have been potentially impacted by project activities: P-37-007983, P-37-026987, NK-S-001, and NK-S-002. Archival research, archaeological testing, and laboratory analysis were conducted to determine the eligibility of these sites for listing on the NRHP or the CRHR.

P-37-007983; CA-SDI-7983

This widespread prehistoric artifacts scatter consisting of lithic flakes, debitage, cores, scrapers, hammerstones, and handstones covered over 50 acres. Its southern portion was evaluated, recommended not eligible, and it was subsequently destroyed with the construction of the Kaiser Permanente building in 1998. The northwestern portion of the mapped site boundary, previously designated Locus B, intersects the current project APE. The portion of Locus B that intersects the project APE consists of steep hillsides with shallow bedrock. A flatter portion of Locus B is located south of the project APE, closer to the Kaiser Permanente building. The only level surfaces of Locus B within the project APE were manufactured by grading to support the installation of a transmission line. No surface artifacts were identified during the current survey and the likelihood of buried deposits on this steep hillside are extremely low. For this reason, Dudek did not conduct archaeological testing. Further research of P-37-007983 within the proposed project APE is unlikely to yield information important in prehistory and, as such, Dudek recommends this portion of P-37-007983 not eligible for listing on the NRHP or the CRHR under Criterion D or 4, respectively. Further, as a prehistoric archaeological site, this site is not eligible for listing on the NRHP or the CRHR under Criteria A through C or Criteria 1 through 3, respectively. Dudek recommends this portion of the resource as not significant under CEQA. Dudek does not have a recommendation for the significance of Locus B outside of the APE.

P-37-026987; CA-SDI-17668

The eastern portion of this low density lithic scatter and shell deposit was previously surface collected, archaeologically tested, and recommended not eligible for listing on the NRHP (Mooney, Jones, and Stokes 2005). As described in Section 5, Results, Dudek evaluated the western portion of the resource using additional close-interval survey and excavation of a single STP at the 22- by 10-meter site's center. Excavation of the STP produced no cultural materials and identified no features or midden. Further excavation at P-37-026987 is unlikely to yield information important to prehistory. Dudek recommends P-37-026987, in its entirety, not eligible for listing on the CRHR under Criterion D, 4, respectively. As a prehistoric archaeological site, this site is not eligible for listing on the NRHP under criteria A through C or CRHR under criteria 1 through 3. Dudek recommends this resource as not significant under CEQA.

NK-S-001

This resource consists of four concrete foundations located in a fallow agricultural field. The upper structures have been completely removed from the four foundations and only fragments of the wooden sill plates are still attached by bolts. The platforms are currently covered with graffiti and modern refuse. No artifacts were identified and it appears that all remnants of the structures were removed.

Review of historic aerial photographs show that Foundation 2 was built between 1968 and 1971. The other three foundations were built after 1971. Only Foundation 2 was possibly constructed during the historic-era.

Because the over-structures were removed, NK-S-001 lacks integrity, which is an important component of a resource's significance. Further, historic aerials show that only one of the foundations was built before 1971. NK-S-001 is not associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of the nation or California (Criterion A/1); the site is not associated with the lives of persons important to national, local, or California history (Criterion B/2); and the foundations do not embody the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values (Criterion C/3). No refuse or artifacts were identified on the surface. It is unlikely that there are any buried deposits due to the waste removal services available during the early 1970 and, if there were buried deposits, the refuse would date to the early 1970s. This resource does not contain any data potential that could provide information regarding the history of the area (Criterion D/4). Therefore, the site is recommended as not eligible for listing in the NRHP or the CRHR and is not significant under CEQA.

NK-S-002

This prehistoric sparse lithic scatter is located in a fallow agricultural field. The field is overgrown with vegetation and the lithic scatter was identified on a dirt access road. The initial survey of the site identified 18 volcanic flakes, one volcanic core fragment, and two bifaces. When Dudek returned to the site for archaeological testing, only seven volcanic lithic debitage fragments were identified on the surface and the lithic tools were missing. Three STPs were placed in the dirt road where the surface artifacts were identified, one STP was placed eight meters south of the dirt road, and the SSU was placed eight meters north of the road. The excavations identified a very sparse subsurface deposit consisting only of lithic debitage. The sediments revealed by all units consisted of homogenous sandy loam with no stratigraphy. This suggest that the sediments were greatly disturbed by previous agricultural activities.

Considering the low yield of cultural material from the archaeological excavations, the lack of artifact diversity, and the disturbed soils, NK-S-002 does not possess a significant subsurface archaeological deposit. Further research at NK-S-002 is unlikely to yield information important in prehistory and Dudek recommends NK-S-002 not eligible for listing on the NRHP and the CRHR under criteria D and 4, respectively. As a prehistoric archaeological site, this site is not eligible for listing on the NRHP under criteria A through C or CRHR under criteria 1 through 3. Therefore, the site is recommended as not eligible for listing in the CRHR and not significant under CEQA.

6.2 Impacts Analysis and Recommendations

The current study identified two previously identified resources and two newly recorded resources within the project APE: P-37-007983, P-37-026987, NK-S-001, and NK-S-002. The current study found that the portion of P-37-007983 that intersects the APE consists of a steep hillside and is unlikely to contain buried deposits. Dudek recommends this portion of the resource not eligible for listing on the NRHP or the CRHR. The current study conducted archaeological testing and archival review of P-37-026987, NK-S-001, and NK-S-002 and recommends these resources not eligible in their entirety for listing on the NRHP or CRHR.

Table 4 provides a summary of each resource (P-37-007983, P-37-026987, NK-S-001, and NK-S-002) identified during the current survey. Table 4 includes management recommendations for each resource per the findings of this study.

Table 4. Historical Resources Management Recommendations

Primary Number/ Temporary ID	Trinomial	NRHP/CRHP Status	Description	Impact	Recommendations/ Mitigation Measures
P-37-007983	CA-SDI-7983	6Z (Found ineligible through survey evaluation)	Prehistoric artifact scatter	Intersects APE; Portion within APE will be destroyed	Portion within APE recommended not eligible; Cultural monitoring
P-37-026987	CA-SDI-17668	6Z (Found ineligible through survey evaluation)	Prehistoric lithic and shell scatter	Intersects APE; Will be destroyed	Recommended not eligible; Cultural monitoring
NK-S-001	—	6Z (Found ineligible through survey evaluation)	Historic-era foundations	Intersects APE; Will be destroyed	Recommended not eligible; Cultural monitoring
NK-S-002	—	6Z (Found ineligible through survey evaluation)	Prehistoric lithic scatter	Intersects APE; Will be destroyed	Recommended not eligible; Cultural monitoring

Based on the results and recommendations provided, this study finds that the project would have no impact on significant resources under CEQA. Though recommended not eligible, the presence of the four historical resources within the APE increases the probability that ground-disturbing activities may encounter buried historical resources. Dudek recommends the presence of an archaeological monitor and a Kumeyaay Native American monitor during initial ground disturbance for the project.

6.3 Mitigation Measures

Although all currently known historical resources within the project APE are recommended not significant under CEQA, mitigation measures were developed to reduce the potential significant impact to previously undiscovered historical resources. This study was completed in compliance with California, City of Chula Vista, and City of San Diego regulations. The project includes two scenarios; the Annexation Scenario with the project area being annexed into the City of San Diego and the No Annexation Scenario with the project area remaining in the City of Chula Vista. Both project scenarios propose the same development footprint and same impacts to historical resources. However, because mitigation measures vary between the Cities of Chula Vista and San Diego, two sets of mitigation measures are present below depending on the two scenarios. Each mitigation measure fulfill the requirements of CEQA.

Implementation of the following mitigation measures will reduce potential significant impacts to previously undiscovered historical resources to a level below significance.

6.3.1 Annexation Scenario

In the event that the Annexation Scenario is carried out, the following mitigation measure would reduce the potential for impacts on historical resources:

MM-CUL-1

I. Prior to Permit Issuance or Bid Opening/Bid Award

A. Entitlements Plan Check

1. Prior to permit issuance or Bid Opening/Bid Award, whichever is applicable, the Environmental Designee (ED) shall verify that the requirements for Archaeological Monitoring and Native American monitoring have been noted on the applicable construction documents through the plan check process.

B. Letters of Qualification have been submitted to ED

1. Prior to Bid Award, the applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.
2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project meet the qualifications established in the HRG.
3. Prior to the start of work, the applicant must obtain written approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

A. Verification of Records Search

1. The PI shall provide verification to MMC that a site-specific records search (1/4 mile radius) has been completed. Verification includes, but is not limited to a copy of a confirmation letter from South Coastal Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.
3. The PI may submit a detailed letter to MMC requesting a reduction to the ¼ mile radius.

B. PI Shall Attend Precon Meetings

1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Native American consultant/monitor (where Native American resources may be impacted), Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified Archaeologist and Native American Monitor shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor.
    a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.
2. Acknowledgement of Responsibility for Curation (CIP or Other Public Projects)

    The applicant shall submit a letter to MMC acknowledging their responsibility for the cost of curation associated with all phases of the archaeological monitoring program.
3. Identify Areas to be Monitored

Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) (with verification that the AME has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits.

The AME shall be based on the results of a site specific records search as well as information regarding the age of existing pipelines, laterals and associated appurtenances and/or any known soil conditions (native or formation).

MMC shall notify the PI that the AME has been approved.

4. When Monitoring Will Occur
   a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.
   b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate conditions such as age of existing pipe to be replaced, depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.
5. Approval of AME and Construction Schedule

   After approval of the AME by MMC, the PI shall submit to MMC written authorization of the AME and Construction Schedule from the CM.

III. During Construction

A. Monitor Shall be Present During Grading/Excavation/Trenching/Habitat Restoration

1. The Archaeological Monitor shall be present full-time during all soil disturbing and grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. **The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances OSHA safety requirements may necessitate modification of the AME.**
2. The Native American consultant/monitor shall determine the extent of their presence during soil disturbing and grading/excavation/trenching activities based on the AME and provide that information to the PI and MMC. If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop and the Discovery Notification Process detailed in Section III.B-C and IV.A-D shall commence.
3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered that may reduce or increase the potential for resources to be present.
4. The archaeological and Native American consultant/monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR's shall be emailed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (**Notification of Monitoring Completion)**, and in the case of ANY discoveries. The RE shall forward copies to MMC.

B. Discovery Notification Process

1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert all soil disturbing activities, including but not limited to digging, trenching, excavating or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources and immediately notify the RE or BI, as appropriate.
2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by email with photos of the resource in context, if possible.
4. No soil shall be exported off-site until a determination can be made regarding the significance of the resource specifically if Native American resources are encountered.

C. Determination of Significance

1. The PI and Native American consultant/monitor, where Native American resources are discovered shall evaluate the significance of the resource. If Human Remains are involved, follow protocol in Section IV below.
    a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required.
    b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) and obtain written approval of the program from MMC, CM and RE. ADRP and any mitigation must be approved by MMC, RE and/or CM before ground disturbing activities in the area of discovery will be allowed to resume. **Note: If a unique archaeological site is also an historical resource as defined in CEQA Section 15064.5, then the limits on the amount(s) that a project applicant may be required to pay to cover mitigation costs as indicated in CEQA Section 21083.2 shall not apply.**
        (1). Note: For pipeline trenching and other linear projects in the public Right-of-Way, the PI shall implement the Discovery Process for Pipeline Trenching projects identified below under "D."
    c. If the resource is not significant, the PI shall submit a letter to MMC indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required.
        (1). Note: For Pipeline Trenching and other linear projects in the public Right-of-Way, if the deposit is limited in size, both in length and depth; the information value is limited and is not associated with any other resource; and there are no unique features/artifacts associated with the deposit, the discovery should be considered not significant.
        (2). Note, for Pipeline Trenching and other linear projects in the public Right-of-Way, if significance cannot be determined, the Final Monitoring Report and Site Record (DPR Form 523A/B) shall identify the discovery as Potentially Significant.

D. Discovery Process for Significant Resources - Pipeline Trenching and other Linear Projects in the Public Right-of-Way

The following procedure constitutes adequate mitigation of a significant discovery encountered during pipeline trenching activities or for other linear project types within the Public Right-of-Way including but not limited to excavation for jacking pits, receiving pits, laterals, and manholes to reduce impacts to below a level of significance:

1. Procedures for documentation, curation and reporting

a. One hundred percent of the artifacts within the trench alignment and width shall be documented in-situ, to include photographic records, plan view of the trench and profiles of side walls, recovered, photographed after cleaning and analyzed and curated. The remainder of the deposit within the limits of excavation (trench walls) shall be left intact.

b. The PI shall prepare a Draft Monitoring Report and submit to MMC via the RE as indicated in Section VI-A.

c. The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) the resource(s) encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines. The DPR forms shall be submitted to the South Coastal Information Center for either a Primary Record or SDI Number and included in the Final Monitoring Report.

d. The Final Monitoring Report shall include a recommendation for monitoring of any future work in the vicinity of the resource.

IV. Discovery of Human Remains

If human remains are discovered, work shall halt in that area and no soil shall be exported off-site until a determination can be made regarding the provenance of the human remains; and the following procedures as set forth in CEQA Section 15064.5(e), the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken:

A. Notification

1. Archaeological Monitor shall notify the RE or BI as appropriate, MMC, and the PI, if the Monitor is not qualified as a PI. MMC will notify the appropriate Senior Planner in the Environmental Analysis Section (EAS) of the Development Services Department to assist with the discovery notification process.
2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone.

B. Isolate discovery site

1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenience of the remains.
2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenience.
3. If a field examination is not warranted, the Medical Examiner will determine with input from the PI, if the remains are or are most likely to be of Native American origin.

C. If Human Remains **ARE** determined to be Native American

1. The Medical Examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, **ONLY** the Medical Examiner can make this call.
2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.
3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with CEQA Section 15064.5(e), the California Public Resources and Health & Safety Codes.
4. The MLD will have 48 hours to make recommendations to the property owner or representative, for the treatment or disposition with proper dignity, of the human remains and associated grave goods.

5. Disposition of Native American Human Remains will be determined between the MLD and the PI, and, if:
    a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being notified by the Commission, OR;
    b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner, THEN
    c. To protect these sites, the landowner shall do one or more of the following:

        (1). Record the site with the NAHC;

        (2). Record an open space or conservation easement; or

        (3). Record a document with the County.
    d. Upon the discovery of multiple Native American human remains during a ground disturbing land development activity, the landowner may agree that additional conferral with descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains. Culturally appropriate treatment of such a discovery may be ascertained from review of the site utilizing cultural and archaeological standards. Where the parties are unable to agree on the appropriate treatment measures the human remains and items associated and buried with Native American human remains shall be reinterred with appropriate dignity, pursuant to Section 5.c., above.

D. If Human Remains are **NOT** Native American
    1. The PI shall contact the Medical Examiner and notify them of the historic era context of the burial.
    2. The Medical Examiner will determine the appropriate course of action with the PI and City staff (PRC 5097.98).
    3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the San Diego Museum of Man for analysis. The decision for internment of the human remains shall be made in consultation with MMC, EAS, the applicant/landowner, any known descendant group, and the San Diego Museum of Man.

V. Night and/or Weekend Work

A. If night and/or weekend work is included in the contract
    1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.
    2. The following procedures shall be followed.
        a. No Discoveries

            In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSVR and submit to MMC via email by 8AM of the next business day.
        b. Discoveries

            All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction, and IV – Discovery of Human Remains. Discovery of human remains shall always be treated as a significant discovery.
        c. Potentially Significant Discoveries

If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction and IV-Discovery of Human Remains shall be followed.

d. The PI shall immediately contact the RE and MMC, or by 8AM of the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.

B. If night and/or weekend work becomes necessary during the course of construction

1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
2. The RE, or BI, as appropriate, shall notify MMC immediately.

C. All other procedures described above shall apply, as appropriate.

VI. Post Construction

A. Submittal of Draft Monitoring Report

1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix C/D) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC via the RE for review and approval within 90 days following the completion of monitoring. **It should be noted that if the PI is unable to submit the Draft Monitoring Report within the allotted 90-day timeframe as a result of delays with analysis, special study results or other complex issues, a schedule shall be submitted to MMC establishing agreed due dates and the provision for submittal of monthly status reports until this measure can be met.**

   a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program or Pipeline Trenching Discovery Process shall be included in the Draft Monitoring Report.

   b. Recording Sites with State of California Department of Parks and Recreation

      The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.

2. MMC shall return the Draft Monitoring Report to the PI via the RE for revision or, for preparation of the Final Report.
3. The PI shall submit revised Draft Monitoring Report to MMC via the RE for approval.
4. MMC shall provide written verification to the PI of the approved report.
5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.

B. Handling of Artifacts

1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and catalogued
2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.

C. Curation of artifacts: Accession Agreement and Acceptance Verification

1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the Native American representative, as applicable.
2. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures were taken to ensure no further disturbance occurs in accordance with Section IV – Discovery of Human Remains, Subsection C.
3. The PI shall submit the Accession Agreement and catalogue record(s) to the RE or BI, as appropriate for donor signature with a copy submitted to MMC.
4. The RE or BI, as appropriate shall obtain signature on the Accession Agreement and shall return to PI with copy submitted to MMC.
5. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.

D. Final Monitoring Report(s)

1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to MMC (even if negative), within 90 days after notification from MMC of the approved report.
2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution

6.3.2 No Annexation Scenario

In the event that the No Annexation Scenario is carried out, the following mitigation measures would reduce the potential for impacts on historical resources:

MM-CUL-2 In order to mitigate impacts to historical resources to a level that is less than significant, procedures for proper treatment of unanticipated archaeological finds must comply with the California Environmental Quality Act (CEQA) Guidelines. Adherence to the following requirements during initial earth-disturbing activities will assure the proper treatment of unanticipated archaeological or Native American cultural material:

1. An archaeological monitor and a Kumeyaay Native American monitor shall be present full-time during all initial ground-disturbing activities. If proposed project excavation later present evidence suggesting a decrease in cultural sensitivity, the monitoring schedule can be reduced pending archaeological, Native American, and City of Chula Vista consultation.
2. In the event that previously unidentified potentially significant historical resources are discovered, the archaeological monitor, Native American monitor, construction or other personnel shall have the authority to divert or temporarily halt ground disturbance operations in the area of the find. The archaeological monitor shall evaluate and minimally document isolates and clearly non-significant deposits in the field. More significant deposits shall be evaluated by the cultural Primary Investigator in consultation with the Native American monitor and City of Chula Vista staff. For significant historical resources, a Research Design and Data Recovery Program to mitigate impacts shall be prepared by the qualified archaeologist and approved by the City of Chula Vista, then carried out using professional

archaeological methods. The Research Design and Data Recovery Program shall include (1) reasonable efforts to preserve (avoidance) "unique" historical resources or Sacred Sites pursuant to CEQA Section 21083.2(g) as the preferred option; (2) the capping of identified Sacred Sites or unique historical resources and placement of development over the cap, if avoidance is infeasible; and (3) data recovery for non-unique historical resources. Construction activities will be allowed to resume in the affected area only after proper evaluation.

MM-CUL-3 In order to mitigate impacts to human remains to a level that is less than significant, procedures for proper treatment of unanticipated finds must comply with the California Environmental Quality Act (CEQA) Guidelines. In the event of discovery of unanticipated human remains, personnel shall comply with Public Resources Code Section 5097.98, CEQA Section 15064.5, and Health and Safety Code Section 7050.5 during earth-disturbing activities:

1. If any human remains are discovered, the construction personnel or the appropriate representative shall contact the County Coroner and City of Chula Vista. Upon identification of human remains, no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin. If the remains are determined to be of Native American origin, the Most Likely Descendant, as identified by the Native American Heritage Commission, shall be contacted by the property owner or their representative in order to determine proper treatment and disposition of the remains. The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the Most Likely Descendant regarding their recommendations as required by California Public Resources Code Section 5097.98 has been conducted. California Public Resources Code Section 5097.98, CEQA Section 15064.5 and Health & Safety Code Section 7050.5 shall be followed.

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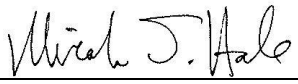
8 Certification

Preparer: Micah Hale, PhD, RPA	**Title:** Archaeologist
Signature: 	**Date:** February 16, 2022

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Appendix A

Project Personnel Qualifications

Matthew DeCarlo

Archaeologist

Matthew DeCarlo is an archaeologist with more than 13 years' professional experience leading archaeological surveys and excavations, performing lithic and faunal analyses, constructing and analyzing geographic information system (GIS) data, and producing cultural resource management reports.

As acting district archaeologist for the U.S. Forest Service (USFS), Mr. DeCarlo worked intensively with federal regulations and Native American tribal representatives and from this experience, has developed the ability to work collaboratively with consulting groups on multi-phase projects. Within the private sector, Mr. DeCarlo has managed the cultural resource requirements for large-scale utility projects which required extensive cooperation with utility managers, construction efforts, and Native American tribal representatives.

Education

California State University, Bakersfield
M.A., Anthropology, pending

University of California, Irvine
B.A., Anthropology, 2006

Professional Affiliations

San Diego Archaeological Society

Society for American Archaeology

Society for California Archaeology

Project Experience

Cultural Resources Impact Assessment and Evaluation for the West of Devers Upgrade Project (WODUP), Southern California Edison (SCE), Riverside and San Bernardino Counties, California. Served as project manager for a cultural resource impact assessment for a dual transmission line upgrade spanning from North Palm Springs to San Bernardino, California. Tasks included implementing archaeological surveys and excavations, producing a cultural resource evaluation report, and participation in construction site visits with SCE staff and construction specialists to resolve construction/resource conflicts. The WODUP preconstruction activities are nearing completion.

Construction Monitoring for Devers to Palo Verde 2 (DPV2) Transmission Line Project, SCE, Riverside County, California. Served as field director for the construction of a 500 kV transmission line spanning from Blythe to Romoland, California. Tasks included conducting archaeological surveys and excavations; managing construction monitoring teams; producing cultural resource records and reports; and consulting with SCE, construction, and Native American representatives. The final cultural resource report has been submitted and is awaiting approval.

Mountain Top Healthy Trees Project, USFS, Mount Pinos Ranger District, Santa Barbara County, California. Served as the acting district archaeologist for a proposed tree thinning project. To ensure that no previously recorded resources were impacted during the tree mastication, Mr. DeCarlo conducted a records search, delineated mastication boundaries, and monitored the mastication activities.

ARRA Wilderness Trails Restoration Project, USFS, Mount Pinos Ranger District, Santa Barbara and Ventura Counties, California. Served as the acting district archaeologist. Fulfilled cultural resource requirements for National Environmental Policy Act (NEPA) compliance to ensure the Mount Pinos Ranger District of the Los Padres Forest received American Recovery and Reinvestment Act (ARRA) federal funds to conduct trail work within wilderness areas. This required consultation with USFS supervisors to construct a viable timetable, completion of a records search, intensive survey of trails, and collaboration with trail maintenance crew chiefs to protect threatened cultural resources.

Cultural Resources Management for the Day Fire Reforestation Project, USFS, Mount Pinos Ranger District, Ventura County, California. Served as the acting district archaeologist for the reforestation of areas burned during the 2007 Day Wildfire. Prior to the planting of pine tree saplings, Mr. DeCarlo performed a records search, conducted an archaeological inventory, and evaluated the post-fire condition of previously identified archaeological sites. A survey report and archaeological site records were submitted to the Los Padres National Forest Headquarters and tree saplings were planted in the spring of 2010.

Sierra Madre Ridge Archaeological Survey and Rock Art Recordation Project, USFS, Mount Pinos Ranger District, Santa Barbara County, California. Served as the field chief for the Sierra Madre Ridge Project, a Section 110 of the National Historic Preservation Act (NHPA) project consisting of three one-week expeditions to update site records and survey previously unrecorded portions of a known archaeological district. Tasks included leading and training volunteer teams in survey and site recordation methods, updating previously recorded archaeological sites, identification of new sites, surveying previously unrecorded land, and managing fuels near significant sites to prevent possible fire damage. A survey report, site records, and GIS mapping were completed and submitted to the Los Padres National Forest Headquarters.

NEPA Compliance for the New Chuchupate Ranger Station, USFS, Mount Pinos Ranger District, Ventura County, California. Served as the acting district archaeologist. To ensure NEPA compliance and ensure acquisition of ARRA federal funds, conducted a records search, collaborated with the Forest Tribal Liaison, updated previously recorded sites, mapped the existing Chuchupate Ranger Station, conducted an intensive survey, contracted an architectural historian, and submitted a report to the Los Padres National Forest Headquarters.

Sapaski (Painted Rock) Tribal Protection Meeting, USFS, Mount Pinos Ranger District, Ventura County, California. Served as the acting district archaeologist for the Sapaski Tribal Protection Meeting, a collaborative effort with tribal representatives and USFS supervisors to protect a significant rock art resource. Conducted a records search and suggested possible protection strategies to tribal representatives.

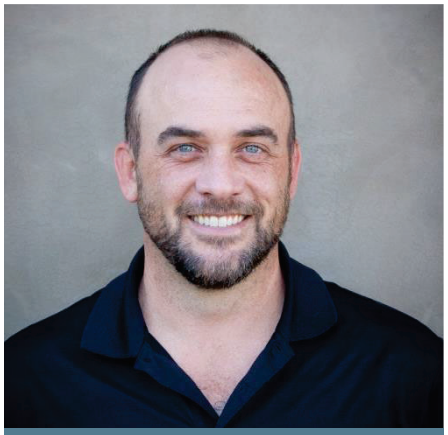
Archaeological Investigation for the Yellow Jacket Fire Project, USFS, Mount Pinos Ranger District, Ventura County, California. Served as the acting district archaeologist for the archaeological investigation after the Yellow Jacket Fire. Conducted a records search to identify any previously identified cultural resource within burned or staging areas, appraised sites impacted by both fire and fire-fighting measures, consulted with fire personnel to determine possible impacts, and submitted a report to the Los Padres National Forest Headquarters.

Micah Hale, PhD, RPA

Senior Archaeologist

Micah Hale is Dudek's cultural resources lead principal investigator, with technical expertise as a lithic and groundstone analyst, invertebrate analyst, and in ground penetrating radar. Over the course of his 19-year career, Dr. Hale has served as a principal investigator in the public and private sector for all levels of archaeological investigation, as a public outreach coordinator and as an assistant professor at the University of California, Davis (U.C. Davis). He currently functions as a principal investigator in project oversight including proposals, research designs, fieldwork, artifact analysis, and report authorship.

Dr. Hale's experience is both academic and professional spanning California, Arizona, Nevada, and Oregon, including work for Naval Facilities Engineering Command (NAVFAC) Southwest, California Department of Transportation (Caltrans), Western Area Power Administration, Bureau of Land Management (BLM), U.S. Army Corps of Engineers (ACOE), U.S. Fish and Wildlife Service (USFWS), California State Parks, various city and county agencies, and directly for Native American groups. Dr. Hale has supervised numerous large-scale surveys, test excavations, data recovery programs, and geoarchaeological investigations, served as a third party review consultant, and an expert witness in legal proceedings. He has authored research designs, management and treatment plans, proposals, preliminary and final reports, and technical analyses. Dr. Hale has integrated his personal research interests into projects and participated in professional symposia at local and national venues, including the Society for American Archaeology and the Society for California Archaeology. Additionally, he has conducted academic research in the Polar Arctic, Greenland. Dr. Hale's current focus is on hunter-gatherer archaeology of California and the Great Basin, applying theoretical premises of cultural evolution and human behavioral ecology.



Micah Hale

Education

University of California, Davis
PhD, Anthropology, 2009

California State University, Sacramento
MA, Anthropology, 2001

University of California, Davis
BS, Anthropology, 1996

Certifications

Register of Professional Archaeologists (RPA), 2001

Professional Affiliations

Society for American Archaeology

Society for California Archaeology

Antelope Valley Archaeological Society

San Diego Archaeological Society

Project Experience

Phase II Archaeological Data Recovery for the Newland Homes Sierra Project, San Diego County, California. As project manager and principal investigator, supervising data recovery investigations at two significant prehistoric archaeological sites and historic archival research of a homestead in support of the Newland Sierra Environmental Impact Report (EIR).

Phase I Archaeological Inventory and Phase II Archaeological Evaluation for the Yokohl Ranch Project, Tulare County, California. As project manager and principal investigator, supervised completion of 12,000 acre survey and archaeological evaluation of 85 prehistoric and historical archaeological sites in support of the Yokohl Ranch EIR.

Phase I Inventory and Phase II Cultural Resources Evaluation for the Star Ranch Project, RBF Consulting, San Diego County, California. As project manager and principal investigator, supervised CEQA inventory and evaluation for private development.

Phase II Archaeological Evaluation of Two Prehistoric Sites, Torrey Pines Glider Port, San Diego County, California. As project manager and principal investigator, supervised CEQA evaluation of two prehistoric archaeological sites for the Torrey Pines City Park General Development Plan.

Data Recovery of One Prehistoric Site for the Rhodes Property, Sea Breeze Properties, San Diego County, California. As project manager and principal investigator, supervised CEQA compliant data recovery of a large prehistoric site for a residential development.

Archaeological Survey of the Paramount Mine Exploratory Drilling Project, Essex Environmental, Mono County, Nevada. As principal investigator and field director, conducted archaeological survey for mining exploration and prepared the technical report.

Phase I Inventory of 1,544 Acres and Phase II Evaluation of Archaeological Sites along the Western and Northwestern Boundaries, Edwards Air Force Base, Kern County, California. As field director, supervised a Phase I inventory of 1,544 acres. Recorded 30 new archaeological sites, more than a dozen "sub-modern" refuse dumps, and a variety of isolate finds. Notable sites include several early Holocene lithic scatters (Lake Mojave-, Silver Lake-, and Pinto-age deposits), a rhyolite lithic quarry, and a complex of historic dumps associated with homesteading activities around Lone Butte.

Archaeological Survey of the La Mesa Meadows Residential Development Project, Helix Environmental, San Diego County, California. As principal investigator, conducted a survey of a proposed residential development in San Diego County.

Pankey Ranch Testing, Pardee Homes, Northern San Diego County, California. As field director, supervised excavation of shovel test pits to delineate the boundaries of site CA-SDI-682, the prehistoric village of Tom-Kav. Managed field personnel, conducted excavation, and wrote portions of technical report.

Oceanside Hilton EIR, Dudek Associates, Oceanside, San Diego County, California. As principal investigator and field director, conducted a survey of the proposed Hilton Hotel at the eastern end of Buena Vista Lagoon in Carlsbad and prepared portions of technical report for an EIR.

Data Recovery of Locus O, Star Canyon Development, Agua Caliente Band of Cahuilla Indians, Palm Springs, Riverside County, California. As field director, supervised field crews for data recovery mitigation of an archaeological deposit and human remains near Tahquitz Canyon. Coordinated with Native American representatives and prepared portions of the technical report.

Linda Vista Survey, City of San Marcos Planning Department, San Diego County, California. As field director, conducted a Phase I cultural resource inventory of the proposed road realignment in San Marcos. Prepared technical reports and made recommendations for additional work to be done within the project area.

Kaiser Permanente Murrieta Valley Medical Center Preliminary Environmental Impact Report (PEIR), City of Murrieta, California. Dr. Hale acted as Principal Investigator on the Kaiser Murrieta project, overseeing a Phase I cultural resources inventory and Phase II archaeological significance evaluation of one prehistoric resource. Dr. Hale assisted the City with Tribal communication and analysis of potential impacts to a viewshed considered sensitive by local Native Americans. All studies were completed to comply with CEQA guidelines in support of an EIR.

Appendix B (Confidential)

SCIC Records Search Results

Appendix C

NAHC Sacred Lands File Search Results and Tribal Correspondence

Sacred Lands File & Native American Contacts List Request

NATIVE AMERICAN HERITAGE COMMISSION
1550 Harbor Blvd, Suite 100
West Sacramento, CA 95501
(916) 373-3710
(916) 373-5471 – Fax
nahc@nahc.ca.gov

Information Below is Required for a Sacred Lands File Search

Project: Nakano - PN 21476.02

County: San Diego

USGS Quadrangle

Name: Imperial Beach

Township: 18 South Range: 2 West Section(s): 24

Company/Firm/Agency:

Dudek

Contact Person: Matthew DeCarlo

Street Address: 605 Third Street

City: Encinitas, CA Zip: 92024

Phone: (760) 815-7067 Extension:

Fax: (760) 632-0164

Email: mdecarlo@dudek.com

Project Description:

The proposed project consists of land development.

☑ Project Location Map is attached

NATIVE AMERICAN HERITAGE COMMISSION

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

March 4, 2020

Matthew DeCarlo
Dudek

Via Email to: mdecarlo@dudek.com

Re: Nakano Project, San Diego County

Dear Mr. DeCarlo:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information you have submitted for the above referenced project. The results were negative. However, the absence of specific site information in the SLF does not indicate the absence of cultural resources in any project area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites.

Attached is a list of Native American tribes who may also have knowledge of cultural resources in the project area. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. I suggest you contact all of those indicated; if they cannot supply information, they might recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call or email to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from tribes, please notify me. With your assistance, we can assure that our lists contain current information.

If you have any questions or need additional information, please contact me at my email address: steven.quinn@nahc.ca.gov.

Sincerely,

Steven Quinn
Cultural Resources Analyst

Attachment

Native American Heritage Commission
Native American Contact List
San Diego County
3/4/2020

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

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

Ewiiaapaayp Band of Kumeyaay Indians
Michael Garcia, Vice Chairperson
4054 Willows Road Diegueno
Alpine, CA, 91901
Phone: (619) 445 - 6315
Fax: (619) 445-9126
michaelg@leaningrock.net

Ewiiaapaayp Band of Kumeyaay Indians
Robert Pinto, Chairperson
4054 Willows Road Diegueno
Alpine, CA, 91901
Phone: (619) 445 - 6315
Fax: (619) 445-9126
wmicklin@leaningrock.net

Iipay Nation of Santa Ysabel
Clint Linton, Director of Cultural Resources
P.O. Box 507 Diegueno
Santa Ysabel, CA, 92070
Phone: (760) 803 - 5694
cjlinton73@aol.com

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

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

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

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

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

La Posta Band of Diegueno Mission Indians
Gwendolyn Parada, Chairperson
8 Crestwood Road Diegueno
Boulevard, CA, 91905
Phone: (619) 478 - 2113
Fax: (619) 478-2125
LP13boots@aol.com

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

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

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Nakano Project, San Diego County.

Native American Heritage Commission
Native American Contact List
San Diego County
3/4/2020

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

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

San Pasqual Band of Diegueno Mission Indians
John Flores, Environmental Coordinator
P. O. Box 365 Diegueno
Valley Center, CA, 92082
Phone: (760) 749 - 3200
Fax: (760) 749-3876
johnf@sanpasqualtribe.org

Sycuan Band of the Kumeyaay Nation
Kristie Orosco, Kumeyaay Resource Specialist
1 Kwaaypaay Court Kumeyaay
El Cajon, CA, 92019
Phone: (619) 445 - 6917

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

Viejas Band of Kumeyaay Indians
Ernest Pingleton, Tribal Historic Officer, Resource Management
1 Viejas Grade Road Diegueno
Alpine, CA, 91901
Phone: (619) 659 - 2314
epingleton@viejas-nsn.gov

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

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

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Nakano Project, San Diego County.

DUDEK

MAIN OFFICE
605 THIRD STREET
ENCINITAS, CALIFORNIA 92024
T 760.942.5147 T 800.450.1818 F 760.632.0164

March 6, 2020

Mr. John Christman, Chairperson
Viejas Band of Kumeyaay Indians
1 Viejas Grade Rd.
Alpine, CA 91901

Subject: ***Information Request for the Nakano Project in the City of Chula Vista, California***

Dear Mr. Christman,

A private developer has proposed the construction of a residential development with recreational areas in the City of Chula Vista, California. The project area is a 25-acre undeveloped lot adjacent to residential development and Interstate 805. The project area is located in Section 24 within Township 18S/ Range 2W of the Imperial Beach, CA 1:24,000 USGS map (Figure 1).

The Native American Heritage Commission conducted a Sacred Lands file search for the project area. The results of the search were negative for cultural resources within the project area. I am writing as part of the cultural inventory process in order find out if you, or your tribal community, have any knowledge of cultural resources or places that may be impacted by the proposed project. This letter does not constitute formal government-to-government consultation pursuant to Assembly Bill 52 or Senate Bill 18.

If you have any information or concerns pertaining to such information, please contact me.

Respectfully,

Matthew H. DeCarlo

Matthew DeCarlo, M.A.
Archaeologist
DUDEK
Phone: (760) 479-4831
Email: mdecarlo@dudek.com

DUDEK

MAIN OFFICE
605 THIRD STREET
ENCINITAS, CALIFORNIA 92024
T 760.942.5147 T 800.450.1818 F 760.632.0164

March 6, 2020

Mr. John Flores, Environmental Coordinator
San Pasqual Band of Diegueno Mission Indians
P.O. Box 365
Valley Center, CA 92082

Subject: ***Information Request for the Nakano Project in the City of Chula Vista, California***

Dear Mr. Flores,

A private developer has proposed the construction of a residential development with recreational areas in the City of Chula Vista, California. The project area is a 25-acre undeveloped lot adjacent to residential development and Interstate 805. The project area is located in Section 24 within Township 18S/ Range 2W of the Imperial Beach, CA 1:24,000 USGS map (Figure 1).

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If you have any information or concerns pertaining to such information, please contact me.

Respectfully,

Matthew M. DeCarlo

_____

Matthew DeCarlo, M.A.
Archaeologist
DUDEK
Phone: (760) 479-4831
Email: mdecarlo@dudek.com

DUDEK

MAIN OFFICE
605 THIRD STREET
ENCINITAS, CALIFORNIA 92024
T 760.942.5147 T 800.450.1818 F 760.632.0164

March 6, 2020

Mr. Michael Garcia, Vice Chairperson
Ewiiaapaayp Tribe
4054 Willows Road
Alpine, CA 91901

Subject: ***Information Request for the Nakano Project in the City of Chula Vista, California***

Dear Mr. Garcia,

A private developer has proposed the construction of a residential development with recreational areas in the City of Chula Vista, California. The project area is a 25-acre undeveloped lot adjacent to residential development and Interstate 805. The project area is located in Section 24 within Township 18S/ Range 2W of the Imperial Beach, CA 1:24,000 USGS map (Figure 1).

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If you have any information or concerns pertaining to such information, please contact me.

Respectfully,

Matthew H. DeCarlo

_____

Matthew DeCarlo, M.A.
Archaeologist
DUDEK
Phone: (760) 479-4831
Email: mdecarlo@dudek.com

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MAIN OFFICE
605 THIRD STREET
ENCINITAS, CALIFORNIA 92024
T 760.942.5147 T 800.450.1818 F 760.632.0164

March 6, 2020

Mr. Ralph Goff, Chairperson
Campo Band of Diegueno Mission Indians
36190 Church Road, Suite 1
Campo, CA 91906

Subject: ***Information Request for the Nakano Project in the City of Chula Vista, California***

Dear Mr. Goff,

A private developer has proposed the construction of a residential development with recreational areas in the City of Chula Vista, California. The project area is a 25-acre undeveloped lot adjacent to residential development and Interstate 805. The project area is located in Section 24 within Township 18S/ Range 2W of the Imperial Beach, CA 1:24,000 USGS map (Figure 1).

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March 6, 2020

Mr. Allen E. Lawson, Chairperson
San Pasqual Band of Diegueno Mission Indians
P.O. Box 365
Valley Center, CA 92082

Subject: ***Information Request for the Nakano Project in the City of Chula Vista, California***

Dear Mr. Lawson,

A private developer has proposed the construction of a residential development with recreational areas in the City of Chula Vista, California. The project area is a 25-acre undeveloped lot adjacent to residential development and Interstate 805. The project area is located in Section 24 within Township 18S/ Range 2W of the Imperial Beach, CA 1:24,000 USGS map (Figure 1).

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March 6, 2020

Mr. Clint Linton, Director of Cultural Resources
Iipay Nation of Santa Ysabel
P.O. Box 507
Santa Ysabel, CA 92070

Subject: ***Information Request for the Nakano Project in the City of Chula Vista, California***

Dear Mr. Linton,

A private developer has proposed the construction of a residential development with recreational areas in the City of Chula Vista, California. The project area is a 25-acre undeveloped lot adjacent to residential development and Interstate 805. The project area is located in Section 24 within Township 18S/ Range 2W of the Imperial Beach, CA 1:24,000 USGS map (Figure 1).

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March 6, 2020

Mr. Michael Linton, Chairperson
Mesa Grande Band of Dieguneo Mission Indians
P.O. Box 270
Santa Ysabel, CA 92070

Subject: ***Information Request for the Nakano Project in the City of Chula Vista, California***

Dear Mr. Linton,

A private developer has proposed the construction of a residential development with recreational areas in the City of Chula Vista, California. The project area is a 25-acre undeveloped lot adjacent to residential development and Interstate 805. The project area is located in Section 24 within Township 18S/ Range 2W of the Imperial Beach, CA 1:24,000 USGS map (Figure 1).

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March 6, 2020

Ms. Carmen Lucas,
Kwaaymii Laguna Band of Mission Indians
P.O. Box 775
Pine Valley, CA 91962

Subject: ***Information Request for the Nakano Project in the City of Chula Vista, California***

Dear Ms. Lucas,

A private developer has proposed the construction of a residential development with recreational areas in the City of Chula Vista, California. The project area is a 25-acre undeveloped lot adjacent to residential development and Interstate 805. The project area is located in Section 24 within Township 18S/ Range 2W of the Imperial Beach, CA 1:24,000 USGS map (Figure 1).

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March 6, 2020

Mr. Cody Martinez, Chairperson
Sycuan Band of the Kumeyaay Nation
1 Kwaaypaay Court
El Cajon, CA 92019

Subject: ***Information Request for the Nakano Project in the City of Chula Vista, California***

Dear Mr. Martinez,

A private developer has proposed the construction of a residential development with recreational areas in the City of Chula Vista, California. The project area is a 25-acre undeveloped lot adjacent to residential development and Interstate 805. The project area is located in Section 24 within Township 18S/ Range 2W of the Imperial Beach, CA 1:24,000 USGS map (Figure 1).

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March 6, 2020

Ms. Javaughn Miller, Tribal Administrator
La Posta Band of Diegueno Mission Indians
8 Crestwood Rd.
Boulevard, CA 91905

Subject: ***Information Request for the Nakano Project in the City of Chula Vista, California***

Dear Ms. Miller,

A private developer has proposed the construction of a residential development with recreational areas in the City of Chula Vista, California. The project area is a 25-acre undeveloped lot adjacent to residential development and Interstate 805. The project area is located in Section 24 within Township 18S/ Range 2W of the Imperial Beach, CA 1:24,000 USGS map (Figure 1).

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March 6, 2020

Ms. Kristie Orosco, Resource Specialist
Sycuan Band of the Kumeyaay Nation
1 Kwaaypaay Court
El Cajon, CA 92019

Subject: ***Information Request for the Nakano Project in the City of Chula Vista, California***

Dear Ms. Orosco,

A private developer has proposed the construction of a residential development with recreational areas in the City of Chula Vista, California. The project area is a 25-acre undeveloped lot adjacent to residential development and Interstate 805. The project area is located in Section 24 within Township 18S/ Range 2W of the Imperial Beach, CA 1:24,000 USGS map (Figure 1).

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March 6, 2020

Ms. Rebecca Osuna, Chairperson
Inaja-Cosmit Band of Indians
2005 S. Escondido Blvd.
Escondido, CA 92025

Subject: ***Information Request for the Nakano Project in the City of Chula Vista, California***

Dear Ms. Osuna,

A private developer has proposed the construction of a residential development with recreational areas in the City of Chula Vista, California. The project area is a 25-acre undeveloped lot adjacent to residential development and Interstate 805. The project area is located in Section 24 within Township 18S/ Range 2W of the Imperial Beach, CA 1:24,000 USGS map (Figure 1).

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March 6, 2020

Ms. Gwendolyn Parada, Chairperson
La Posta Band of Diegueno Mission Indians
8 Crestwood Rd.
Boulevard, CA 91905

Subject: ***Information Request for the Nakano Project in the City of Chula Vista, California***

Dear Ms. Parada,

A private developer has proposed the construction of a residential development with recreational areas in the City of Chula Vista, California. The project area is a 25-acre undeveloped lot adjacent to residential development and Interstate 805. The project area is located in Section 24 within Township 18S/ Range 2W of the Imperial Beach, CA 1:24,000 USGS map (Figure 1).

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March 6, 2020

Mr. Virgil Perez, Chairperson
Iipay Nation of Santa Ysabel
P.O. Box 130
Santa Ysabel, CA 92070

Subject: ***Information Request for the Nakano Project in the City of Chula Vista, California***

Dear Mr. Perez,

A private developer has proposed the construction of a residential development with recreational areas in the City of Chula Vista, California. The project area is a 25-acre undeveloped lot adjacent to residential development and Interstate 805. The project area is located in Section 24 within Township 18S/ Range 2W of the Imperial Beach, CA 1:24,000 USGS map (Figure 1).

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March 6, 2020

Mr. Ernest Pingleton, Tribal Historic Officer
Viejas Band of Kumeyaay Indians
1 Viejas Grade Rd.
Alpine, CA 91901

Subject: ***Information Request for the Nakano Project in the City of Chula Vista, California***

Dear Mr. Pingleton,

A private developer has proposed the construction of a residential development with recreational areas in the City of Chula Vista, California. The project area is a 25-acre undeveloped lot adjacent to residential development and Interstate 805. The project area is located in Section 24 within Township 18S/ Range 2W of the Imperial Beach, CA 1:24,000 USGS map (Figure 1).

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March 6, 2020

Mr. Robert Pinto, Chairperson
Ewiiaapaayp Tribe
4054 Willow Rd.
Alpine, CA 91901

Subject: ***Information Request for the Nakano Project in the City of Chula Vista, California***

Dear Mr. Pinto,

A private developer has proposed the construction of a residential development with recreational areas in the City of Chula Vista, California. The project area is a 25-acre undeveloped lot adjacent to residential development and Interstate 805. The project area is located in Section 24 within Township 18S/ Range 2W of the Imperial Beach, CA 1:24,000 USGS map (Figure 1).

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March 6, 2020

Ms. Erica Pinto, Chairperson
Jamul Indian Village
P.O. Box 612
Jamul, CA 91935

Subject: ***Information Request for the Nakano Project in the City of Chula Vista, California***

Dear Ms. Pinto,

A private developer has proposed the construction of a residential development with recreational areas in the City of Chula Vista, California. The project area is a 25-acre undeveloped lot adjacent to residential development and Interstate 805. The project area is located in Section 24 within Township 18S/ Range 2W of the Imperial Beach, CA 1:24,000 USGS map (Figure 1).

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March 6, 2020

Mr. Edwin (Thorpe) Romero, Chairperson
Barona Group of the Capitan Grande
1095 Barona Road
Lakeside, CA 92040

Subject: ***Information Request for the Nakano Project in the City of Chula Vista, California***

Dear Mr. Romero,

A private developer has proposed the construction of a residential development with recreational areas in the City of Chula Vista, California. The project area is a 25-acre undeveloped lot adjacent to residential development and Interstate 805. The project area is located in Section 24 within Township 18S/ Range 2W of the Imperial Beach, CA 1:24,000 USGS map (Figure 1).

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March 6, 2020

Ms. Angela Elliott Santos, Chairperson
Manzanita Band of Kumeyaay Nation
P.O. Box 1302
Boulevard, CA 91905

Subject: ***Information Request for the Nakano Project in the City of Chula Vista, California***

Dear Ms. Santos,

A private developer has proposed the construction of a residential development with recreational areas in the City of Chula Vista, California. The project area is a 25-acre undeveloped lot adjacent to residential development and Interstate 805. The project area is located in Section 24 within Township 18S/ Range 2W of the Imperial Beach, CA 1:24,000 USGS map (Figure 1).

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IPAI

SAN PASQUAL BAND OF MISSION INDIANS

SAN PASQUAL RESERVATION

TRIBAL COUNCIL

Stephen W. Cope
Chairman

Justin Quis Quis
Vice Chairman

Tilda M. Green
Secretary-Treasurer

David L. Toler
Councilman

Joe Chavez
Councilman

March 18, 2020,

Matthew DeCarlo, M.A. Archaeologist
DUDEK

RE: Nakao Project in the City of Chula Vista

Dear Mr. DeCarlo,

The San Pasqual Band of Mission Indians Tribal Historic Preservation Office has received your notification of the project referenced above. This letter constitutes our response on behalf of David L. Toler THPO Officer.

We have consulted our maps and determined that the project as described is not within the boundaries of the recognized San Pasqual Indian Reservation. It is, however, within the boundaries of the territory that the tribe considers its Traditional Use Area (TUA). Therefore, we request to be kept in the information loop as the project progresses and would appreciate being maintained on the receiving list for project updates, reports of investigations, and /or any documentation that might be generated regarding previously reported or newly discovered sites. Further, we may recommend archaeological pending the results of site surveys and records searches associated with the project. If the project boundaries are modified to extend beyond the currently proposed limits, we request updated information and the opportunity to respond to your changes.

If you also need a Certified Kumeyaay Monitor San Pasqual Band of Mission Indians can Provide this service for this project. We appreciate involvement with your initiative and look forward to working with you on future efforts. If you have questions or need additional information, please do not hesitate to contact me by telephone 760-651-5142 or by e-mail at THPO@sanpasqualtribe.org.

Sincerely,

Angelina Gutierrez
Tribal Historic Preservation Office, Monitor Supervisor
San Pasqual Band of Mission Indians

Jamul Band Tribal Outreach Response – Nakano

On March 17, 2020 at 330p, Lisa Cumper and Matthew DeCarlo discussed the project over the telephone (Matt's cell).

Lisa said she was not entirely familiar with the area and asked Matt's opinion of the cultural sensitivity.

Matt told her about the two previously recorded prehistoric resources on the periphery and the newly identified resource identified in the interior of the project area.

Matt said they would either avoid or test these sites and recommend monitoring during construction. She was happy hearing we'd recommend monitoring but did not recommend anything.

She requested to be on the distribution list for the report.

Appendix D (Confidential)

New DPR Site Records

Appendix E (Confidential)

Historical Resources in APE Location Map

Appendix F

Artifact Catalog

Nakano Artifact Catalog

Catalog No.	SITE	Unit Type	Unit No.	Size	Top Level	Bottom Level	Screen Size	Class	Object	Material	Condition	Count	Weight
1	NK-S-002	General Surface	N/A	N/A	0	0	N/A	Flaked Stone	Debitage	Volcanic	Complete	6	122.7 g
2	NK-S-002	Shovel Test Pit	STP-01	0.5m x 0.25m	0	0	1/8 in Mesh	Flaked Stone	Debitage	Volcanic	Complete	1	28.7 g
3	NK-S-002	Shovel Test Pit	STP-01	0.5m x 0.25m	0	20	1/8 in Mesh	Flaked Stone	Debitage	Volcanic	Complete	8	11 g
4	NK-S-002	Shovel Test Pit	STP-01	0.5m x 0.25m	20	40	1/8 in Mesh	Flaked Stone	Debitage	Volcanic	Complete	7	6.7 g
5	NK-S-002	Shovel Test Pit	STP-01	0.5m x 0.25m	40	60	1/8 in Mesh	Flaked Stone	Debitage	Volcanic	Complete	3	3.4 g
6	NK-S-002	Shovel Test Pit	STP-01	0.5m x 0.25m	40	60	1/8 in Mesh	Flaked Stone	Debitage	Quartzite	Complete	1	27.4 g
7	NK-S-002	Shovel Test Pit	STP-02	0.5m x 0.25m	0	20	1/8 in Mesh	Flaked Stone	Debitage	Volcanic	Complete	5	8.4 g
8	NK-S-002	Shovel Test Pit	STP-02	0.5m x 0.25m	20	40	1/8 in Mesh	Flaked Stone	Debitage	Volcanic	Complete	4	6.2 g
9	NK-S-002	Shovel Test Pit	STP-03	0.5m x 0.25m	0	20	1/8 in Mesh	Flaked Stone	Debitage	Volcanic	Complete	3	7.4 g
10	NK-S-002	Shovel Test Pit	STP-03	0.5m x 0.25m	20	40	1/8 in Mesh	Flaked Stone	Debitage	Volcanic	Complete	4	12.7 g
11	NK-S-002	Shovel Test Pit	STP-03	0.5m x 0.25m	40	50	1/8 in Mesh	Flaked Stone	Debitage	Volcanic	Complete	1	0.2 g
12	NK-S-002	Shovel Test Pit	STP-04	0.5m x 0.25m	0	20	1/8 in Mesh	Flaked Stone	Debitage	Volcanic	Complete	1	35.6 g
13	NK-S-002	Shovel Test Pit	STP-04	0.5m x 0.25m	0	20	1/8 in Mesh	Flaked Stone	Debitage	CCS	Complete	1	30.1 g
14	NK-S-002	Shovel Scrape Unit	SSU-01	2.0m x 1.0m	0	5	1/8 in Mesh	Flaked Stone	Debitage	Volcanic	Complete	4	5.6 g