

**CULTURAL RESOURCE SURVEY AND EVALUATION FOR THE  
SPIRIT OF JOY LUTHERAN CHURCH PROJECT,  
RAMONA, SAN DIEGO COUNTY, CALIFORNIA  
(3300 08-017 (MUP), Kiva No. 07-0084023, ER Log No. 08-09-005)**

**Project Common Name:**

Spirit of Joy Lutheran Church of Ramona

**Permit Numbers/PDS Environmental Log No:**

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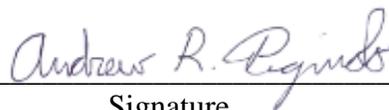
**Lead Agency:**

County of San Diego  
Planning & Development Services  
Contact: Ashley Gungle  
5510 Overland Avenue  
San Diego, CA 92123  
(858) 495-5375

**Preparer:**

Andrew R. Pignuolo, RPA  
Clinton J. Linton

Laguna Mountain Environmental, Inc.  
7969 Engineer Road, Suite 208  
San Diego, CA 92111  
(858) 505-8164



Signature

**Project Proponent:**

Rev. W. Dan Erlenbusch  
Spirit of Joy Lutheran Church  
1735 Main Street  
Ramona, CA 92065

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## **National Archaeological Data Base Information**

*Authors:* Andrew R. Pigniolo and Clinton J. Linton

*Firm:* Laguna Mountain Environmental, Inc.

*Client/Project Proponent:* Rev. W. Dan Erlenbusch

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## **LIST OF ACRONYMS AND ABBREVIATIONS**

AMSL (Above Modern Sea Level)  
APE (Area of Potential Effects)  
ARMR (Archaeological Resource Management Report)  
CA (California)  
California Register (California Register of Historic Resources)  
CEQA (California Environmental Quality Act)  
cm (centimeter)  
CRM (Cultural Resource Management)  
EIR (Environmental Impact Report)  
Laguna Mountain (Laguna Mountain Environmental, Inc.)  
Local Register (San Diego County Local Register of Historic Resources)  
m (meter)  
MOU (Memorandum of Understanding)  
MUP (Major Use Permit)  
NEPA (National Environmental Policy Act)  
NHPA (National Historic Preservation Act)  
RPO (Resource Protection Ordinance)  
SCIC (South Coastal Information Center)  
SDI (San Diego County trinomial prefix)  
SDM (San Diego Museum of Man)

## EXECUTIVE SUMMARY

Laguna Mountain Environmental, Inc. (Laguna Mountain) conducted an archaeological survey and testing program at an 8-acre parcel for the proposed Spirit of Joy Church Project. Archaeological and historical research included a records search, literature review, examination of historic maps, an archaeological field inventory of the property, and an archaeological testing and evaluation program.

Cultural resource work was conducted in accordance with the California Environmental Quality Act (CEQA) and the County of San Diego implementing regulations and guidelines including the County of San Diego Resource Protection Ordinance (RPO). The County of San Diego will serve as lead agency for the project and CEQA compliance.

Records searches at the South Coastal Information Center and the San Diego Museum of Man indicated that the project area has been previously surveyed for road improvement projects related to Highway 67 and Highland Valley Road (Crafts 1991, 1992a, 1992b, Dominici 1987, Joyner 1990, 1991a, 1991b). The project area was surveyed for cultural resources by Joyner (1990) and testing was conducted at CA-SDI-12022 west of the project area to determine if cultural resources would be impacted by the realignment of Highland Valley Road (Joyner 1991a and 1991b). A variety of studies have also been conducted in the vicinity of the project and 41 cultural resources have been previously recorded within a one mile radius of the project.

The survey of the project area was conducted on January 13, 2005 by Mr. Andrew R. Pigniolo, RPA. The project was surveyed on foot in 10 to 15 meter transect intervals. The project area is dominated by non-native grasses. Surface visibility was approximately 50% over most of the property, but rodent burrows and other clearings provided visibility in grass covered areas. The cultural resources survey of the project adequately served to identify cultural resources. One bifacial mano, one milky quartz Cottonwood Triangle projectile point, and three Santiago Peak Volcanic interior flakes were identified during the survey.

One archaeological site was identified within the project area. Site CA-SDI-17299 (SJ-S-1) consists of a prehistoric temporary camp with associated surface artifacts. It is probably a portion of a larger resource located off the project to the north. This site was not identified or tested during the earlier work associated with the Highland Valley Road realignment and has not been evaluated for the California Register of Historical Resources (California Register) eligibility or significance under RPO. Based on the current County guidelines, this resource qualifies as significant.

Project plans indicated this site will be impacted by proposed development. Because CA-SDI-17299 could not be avoided and incorporated into an open-space easement, testing and data recovery was recommended to establish if subsurface cultural material is present.

Testing at CA-SDI-17299 included site mapping, surface collection, and subsurface excavation to determine if a subsurface component is present. Ms. Elizabeth Davidson, RPA, and Mr. Spencer Bietz conducted the testing program on March 15, 2010. Mr. Justin Linton of Red Tail Monitoring & Research, Inc. served as Native American Monitor.

The testing and evaluation program did not identify a subsurface component at site CA-SDI-17299. Surface artifact recovery was very limited. . During testing eight debitage fragments were recovered from the surface. One debitage fragment was recovered from the surface level of an STP, bringing the total debitage fragments to nine. Six of the nine debitage fragments were made from Santiago Peak Volcanic material. The remaining three debitage fragments in the assemblage were made from milky quartz. All of the debitage reflects core reduction and no pressure or bifacial thinning flakes were present. Testing and evaluation has resulted in the recovery of the archaeological material from the site. Curation of the cultural material from the site will result in the preservation of the material that made the site important under County Guidelines. CA-SDI-17299 does not retain any additional information potential, due to an absence of additional artifacts and a subsurface deposit. CA-SDI-17299 is not recommended as eligible for nomination to the California Register, CEQA or the County RPO.

Historic map research indicated that the project area contained a structure in the past. The 1954 edition of the San Pasqual 7.5' USGS Quadrangle shows a single structure within the project area halfway between the original alignment of Highland Valley Road and Dye Road on the western side of Highway 67. This map was based on an aerial photograph taken in 1949, suggesting the structure was built sometime between 1942 and 1949.

This structure also appears on the orthographic layer of the soil series maps made from aerials taken in 1967-1968 (USDA 1973). The structure was still standing in April of 1984 based on the 1:200 scale County Topographic Survey maps, but has since been demolished and no archaeological remains are present.

The potential is present for buried cultural resources based on the alluvial nature of the area and survey results. Cultural resource monitoring by both an archaeological monitor and a Native American monitor is recommended during construction grading and improvements. The monitoring will ensure that any undiscovered buried archaeological resources are identified. If resources are identified, then data recovery excavation may be necessary if impacts cannot be avoided. Curation and grading monitoring will reduce the impacts on CA-SDI-17299 to less than significant under CEQA.

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## **1.0 INTRODUCTION**

### **1.1 Project Description**

#### **1.1.1 Project Summary**

The proposed project is the development of the Spirit of Joy Church on 8 acres. As part of the project, development including building pads, parking areas, and utilities would be graded and excavated. The project consists of the construction of a 5,745 square-foot sanctuary, 5,500 square-foot fellowship hall, two 3,700 square-foot administrative/classroom buildings, a 300 square-foot maintenance/utility building, 182 parking spaces, and associated landscaping.

The 8-acre project area is located in central portion San Diego County within the Community of Ramona (Figure 1). It is located approximately 3 miles east of Mount Woodson, northwest of and adjacent to Highway 67. The project area is located just northeast of and adjacent to Highland Valley Road. The project is located in an unsectioned portion of Santa Maria Land Grant as shown on the San Pasqual USGS 7.5' Quadrangle (Figure 2). The project also includes off-site project impacts from connecting to water, gas, and electrical utilities along Highway 67 and sewer connections along Highland Valley Road.

The archaeological survey and testing program was conducted pursuant to the California Environmental Quality Act (CEQA), and respective County of San Diego implementing regulations and guidelines including the Resource Protection Ordinance (RPO). The County of San Diego will serve as lead agency for CEQA compliance. The archaeological survey and testing was conducted to determine if any cultural resources eligible for inclusion in the California Register of Historic Resources (California Register) or significant under the Resource Protection Ordinance (RPO) will be affected by this project.

#### **1.1.2 Project Personnel**

The cultural resource inventory was conducted by Laguna Mountain Environmental, Inc. (Laguna Mountain), whose cultural resources staff meets state and local requirements. Mr. Andrew R. Pigniolo served as Principal Investigator for the project. Mr. Pigniolo is a member of the Register of Professional Archaeologists (RPA; previously called SOPA) and meets the Secretary of the Interior's standards for qualified archaeologists. He is also on the County of San Diego's list of approved consultants. Mr. Pigniolo has an MA in Anthropology from San Diego State University and has extensive experience in the San Diego region. The resume of the Principal Investigator is included in Appendix A.

Ms. Elizabeth Davidson served as the field director for the testing phase of this project. Ms. Davidson has an MA in Anthropology from the University of Leicester. She has more than 12 years of archaeological field experience in the southern California region.

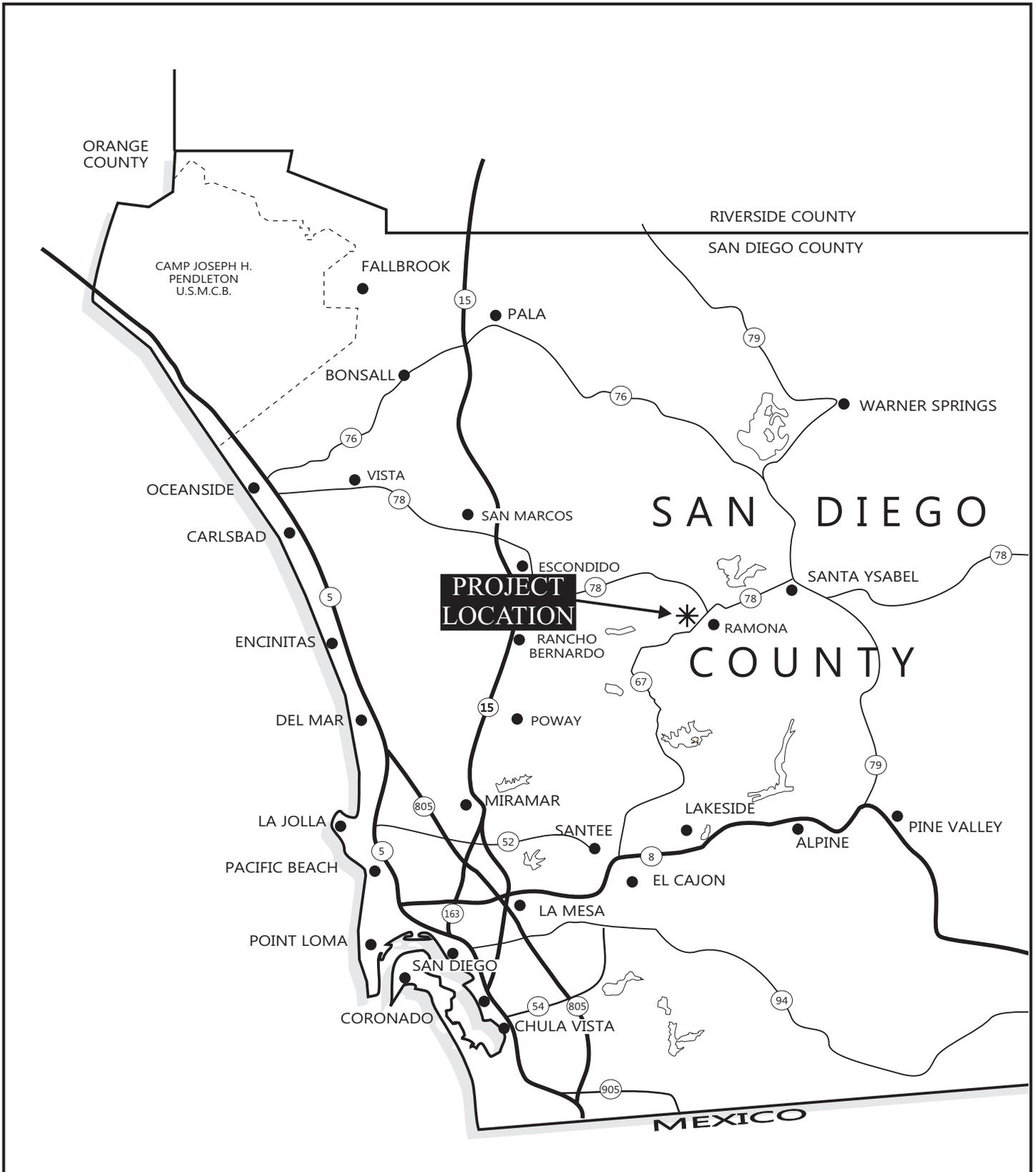
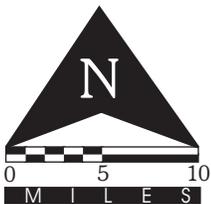
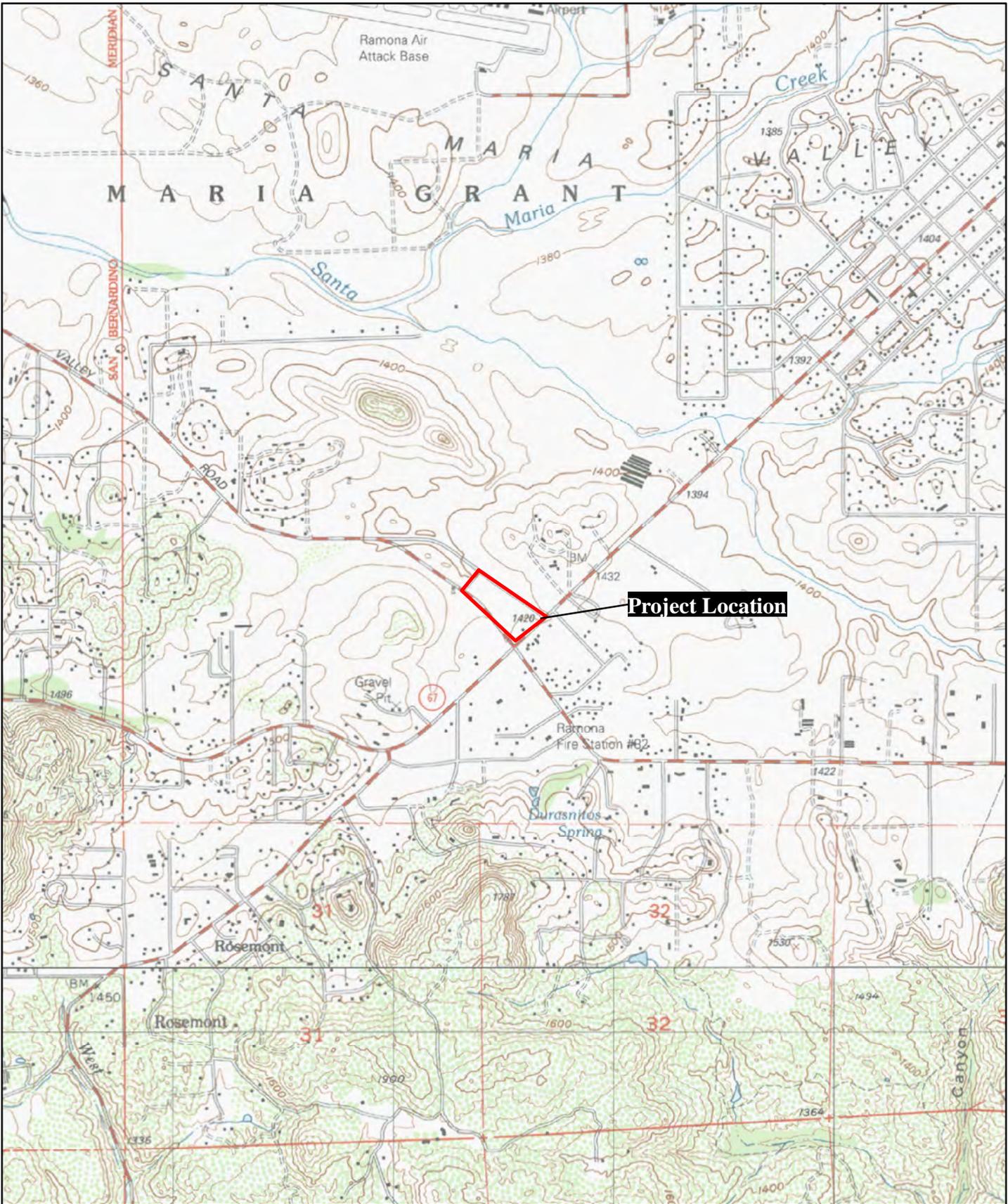


Figure 1  
Regional Location Map





**Project Location**



0 1,000 2,000 Feet



**Figure 2**  
**Project Location**

Source: USGS 7.5' San Pasqual and San Vicente Reservoir Quadrangles





Figure 3  
Project Plan



Mr. Bietz served as field crew member during the testing. Mr. Bietz has a BA in Anthropology from the University of California, San Diego, and more than four years of experience as a professional archaeologist in southern California and Arizona.

Mr. Clinton J. Linton assisted in report writing portions of the original Survey technical report. Mr. Linton has an BS in Anthropology from the University of California, Riverside and has over three years of experience in the San Diego region. Mr. Justin Linton of Red Tail Monitoring & Research, Inc. served as Native American Monitor for the testing phase of the project.

### **1.1.3 Structure of the Report**

This report follows the County of San Diego Report Format and Content Requirements for cultural resources, which is a modified version of the Archaeological Resource Management Report (ARMR) Guidelines (County of San Diego 2007). The report introduction provides a description of the project and background on the project area, as well as any previous research. Section 2 describes the guidelines for determining archaeological significance. Section 3 describes the research design, while Section 4 describes the survey methods and testing methods. The inventory results including a description of the historic structure and the isolated discovery along with the testing results are included in Section 4. Section 5 provides the interpretation of any identified resources and impacts to those resources, and Section 6 includes a discussion of mitigation measures and recommendations for the project.

## **1.2 Existing Conditions**

The following environmental and cultural background provides a context for the cultural resource inventory.

### **1.2.1 Environmental Setting**

The project area is located in the central portion of San Diego County within the foothills and interior valleys of the region. The property is located in the southwestern portion of Santa Maria Valley approximately 3 miles east of Mount Woodson. The property includes a portion of the valley grassland area. Elevations range from 1400 to 1420 feet above mean sea level (AMSL). The property is currently undeveloped.

The geomorphology of the project area is largely a product of the region's geologic history. During the Jurassic and late Cretaceous (>100 million years ago) a series of volcanic islands paralleled the current coastline in the San Diego region. The remnants of these islands stand as Mount Helix, Black Mountain, and the Jamul Mountains among others. This island arc of volcanos spewed out vast layers of tuff (volcanic ash) and breccia that have since been metamorphosed into hard rock of the Santiago Peak Volcanic formation. These fine-grained rocks provided a regionally important resource for Native American flaked stone tools.

At about the same time, a granitic and gabbroic batholith was being formed under and east of these volcanoes. This batholith was uplifted and forms the granitic rocks and outcrops of the Peninsular Range and the foothills to the west. The project area is part of this batholith and is underlain by these granitic rocks (Rogers 1992). Granitic outcrops were present in the northeastern portion of the project area. In San Diego County the large and varied crystals of these granitic rocks provided particularly good abrasive surfaces for Native American seed processing. These outcrops were frequently used for bedrock milling of seeds. The batholith contains numerous pegmatite dikes. This was a good source of quartz, a material used by Native Americans for flaked stone tools and ceremonial purposes.

As the Peninsular Batholith rose, it warped and metamorphosed the overlying sediments, forming the Julian Schist (Remeika and Lindsay 1992). This formation contains quartzite, a material also used for Native American flaked stone tools and common within the project area. Its relatively poor flaking qualities made this quartzite less popular for tool making than the quartz and Santiago Peak materials.

The soils on the property consist of the Bonsall-Fallbrook Series and the Vista Series. Most of the project area contains Bonsall-Fallbrook sandy loam while only a small area of Vista coarse sandy loam is present along the upland area along the old alignment of Highland Valley Road near granitic outcrops. Bonsall-Fallbrook sandy loams occur on slopes from 2 to 5 percent and consist of moderately well drained, shallow to moderately deep sandy loams that have a heavy clay loam subsoil (USDA 1973).

Vista rocky coarse sandy loam occurs on slopes from 5 to 15 percent (USDA 1973). It is well-drained, moderately deep and deep coarse sandy loam derived from granodiorite or quartz diorite.

A shallow ephemeral drainage runs roughly south to north through the central part of the property. This drainage could have provided a seasonal water source for Native Americans using the area.

The climate of the region can generally be described as Mediterranean, with cool, wet winters and hot, dry summers. Rainfall limits vegetation growth. Habitat types adapted to the dry conditions of the region occur in the project area. The project area is dominated by non-native grassland, but probably included native grassland and coastal sage scrub species in the distant past. Components of these communities provided important resources to Native Americans in the region. Sage seed, yucca, buckwheat, acorns, and native grasses formed important food resources to Late Prehistoric Native Americans.

Animal resources in the region include deer, fox, raccoon, skunk, bobcats, coyotes, rabbits, and various rodent, reptile, and bird species. Small game, dominated by rabbits, is relatively abundant.

## 1.1.2. Cultural Setting

### Prehistoric Period

#### Paleoindian Period

The earliest well documented prehistoric sites in southern California are identified as belonging to the Paleoindian period, which has locally been termed the San Dieguito complex/tradition. The Paleoindian period is thought to have occurred between 9,000 years ago, or earlier, and 8,000 years ago in this region. Although varying from the well-defined fluted point complexes such as clovis, the San Dieguito complex is still seen as a hunting focused economy with limited use of seed grinding technology. The economy is generally seen to focus on highly ranked resources such as large mammals and relatively high mobility which may be related to following large game. Archaeological evidence associated with this period has been found around inland dry lakes, on old terrace deposits of the California desert, and also near the coast where it was first documented at the Harris Site.

#### Archaic Period

Native Americans during the Archaic period had a generalized economy that focused on hunting and gathering. In many parts of North America, Native Americans chose to replace this economy with types based on horticulture and agriculture. Coastal southern California economies remained largely based on wild resource use until European contact (Willey and Phillips 1958). Changes in hunting technology and other important elements of material culture have created two distinct subdivisions within the Archaic period in southern California.

The Early Archaic period is differentiated from the earlier Paleoindian period by a shift to a more generalized economy and an increased focus on the use of grinding and seed processing technology. At sites dated between approximately 8,000 and 1,500 years before present (B.P.), the increased use of groundstone artifacts and atlatl dart points, along with a mixed core-based tool assemblage, identify a range of adaptations to a more diversified set of plant and animal resources. Variations of the Pinto and Elko series projectile points, large bifaces, manos and portable metates, core tools, and heavy use of marine invertebrates in coastal areas are characteristic of this period, but many coastal sites show limited use of diagnostic atlatl points. Major changes in technology within this relatively long chronological unit appear limited. Several scientists have considered changes in projectile point styles and artifact frequencies within the Early Archaic period to be indicative of population movements or units of cultural change (Moratto 1984), but these units are poorly defined locally due to poor site preservation.

#### Late Prehistoric Period

Around 2,000 B.P., Yuman-speaking people from the eastern Colorado River region began migrating into southern California, representing what is called the Late Prehistoric Period. The Late Prehistoric Period in San Diego County is recognized archaeologically by smaller projectile points, the replacement of flexed inhumations with cremation, the introduction of ceramics, and an emphasis on inland plant food collection and processing, especially acorns (True 1966). Inland semi-sedentary villages were established along major water courses, and montane areas were seasonally occupied to exploit acorns and piñon nuts, resulting in permanent milling

features on bedrock outcrops. Mortars for acorn processing increased in frequency relative to seed grinding basins. This period is known archaeologically in southern San Diego County as the Yuman (Rogers 1945) or the Cuyamaca Complex (True 1970).

The Kumeyaay (formerly referred to as Diegueño) who inhabited the southern region of San Diego County, western and central Imperial County, and northern Baja California (Almstedt 1982; Gifford 1931; Hedges 1975; Luomala 1976; Shipek 1982; Spier 1923) are the direct descendants of the early Yuman hunter-gatherers. Kumeyaay territory encompassed a large and diverse environment which included marine, foothill, mountain, and desert resource zones. Their language is a dialect of the Yuman language which is related to the large Hokan super family.

There seems to have been considerable variability in the level of social organization and settlement variance. The Kumeyaay were organized by patrilineal, patrilocal lineages that claimed prescribed territories, but did not own the resources except for some minor plants and eagle aeries (Luomala 1976; Spier 1923). Some lineages occupied procurement ranges that required considerable residential mobility, such as those in the deserts (Hicks 1963). In the mountains, some of the larger groups occupied a few large residential bases that would be occupied biannually, such as those occupied in Cuyamaca in the summer and fall, and in Guatay or Descanso during the rest of the year (Almstedt 1982; Rensch 1975). According to Spier (1923), many Eastern Kumeyaay spent the period of time from spring through autumn in larger residential bases in the upland procurement ranges, and wintered in mixed groups in residential bases along the eastern foothills on the edge of the desert (i.e., Jacumba and Mountain Springs). This variability in settlement mobility and organization reflects the great range of environments in the territory.

Acorns were the single most important food source used by the Kumeyaay. Their villages were usually located near water, which was necessary for leaching acorn meal. Other storable resources such as mesquite or agave were equally valuable to groups inhabiting desert areas, at least during certain seasons (Hicks 1963; Shackley 1984). Seeds from grasses, manzanita, sage, sunflowers, lemonadeberry, chia, and other plants were also used along with various wild greens and fruits. Deer, small game and birds were hunted and fish and marine foods were eaten. Houses were arranged in the village without apparent pattern. The houses in primary villages were conical structures covered with tule bundles, having excavated floors and central hearths. Houses constructed at the mountain camps generally lacked any excavation, probably due to the summer occupation. Other structures included sweathouses, ceremonial enclosures, ramadas and acorn granaries. The material culture included ceramic cooking and storage vessels, baskets, flaked lithic and ground stone tools, arrow shaft straighteners, stone, bone, and shell ornaments.

Hunting implements included the bow and arrow, curved throwing sticks, nets and snares. Shell and bone fishhooks, as well as nets, were used for fishing. Lithic materials including quartz and metavolcanics were commonly available throughout much of the Kumeyaay territory. Other lithic resources, such as obsidian, chert, chalcedony and steatite, occur in more localized areas and were acquired through direct procurement or exchange. Projectile points including the Cottonwood Series points and Desert Side-notched points were commonly produced.

Kumeyaay culture and society remained stable until the advent of missionization and displacement by Hispanic populations during the eighteenth century. The effects of missionization, along with the introduction of European diseases, greatly reduced the native population of southern California. By the early 1820s, California was under Mexico's rule. The establishment of ranchos under the Mexican land grant program further disrupted the way of life of the native inhabitants.

### **Ethnohistoric Period**

The Ethnohistoric period refers to a brief period when Native American culture was initially being affected by Euroamerican culture and historical records on Native American activities were limited. When the Spanish colonists began to settle California, the project area was within the territory of a loosely integrated cultural group historically known as the Kumeyaay or Northern and Southern Diegueño because of their association with the San Diego Mission. The Kumeyaay as a whole speak a Yuman language which differentiates them from the Luiseño to the north, who speak a Takic language (Kroeber 1976). Both of these groups were hunter-gatherers with highly developed social systems. European contact introduced diseases that dramatically reduced the Native American population and helped to break down cultural institutions. The transition to a largely Euroamerican lifestyle occurred relatively rapidly in the nineteenth century.

### **Historic Period**

Cultural activities within San Diego County between the late 1700s and the present provide a record of Native American, Spanish, Mexican, and American control, occupation, and land use. An abbreviated history of San Diego County is presented for the purpose of providing a background on the presence, chronological significance, and historical relationship of cultural resources within the county.

Native American control of the southern California region ended in the political views of western nations with Spanish colonization of the area beginning in 1769. De facto Native American control of the majority of the population of California did not end until several decades later. In southern California, Euroamerican control was firmly established by the end of the Garra uprising in the early 1850s (Phillips 1975).

### **Spanish**

The Spanish Period (1769-1821) represents a period of Euroamerican exploration and settlement. Dual military and religious contingents established the San Diego Presidio and the San Diego and San Luis Rey Missions. The Mission system used Native Americans to build a footing for greater European settlement. The Mission system also introduced horses, cattle, other agricultural goods and implements; and provided construction methods and new architectural styles. The cultural and institutional systems established by the Spanish continued beyond the year 1821, when California came under Mexican rule.

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## Mexican

The Mexican Period (1821-1848) includes the retention of many Spanish institutions and laws. The mission system was secularized in 1834, which dispossessed many Native Americans and increased Mexican settlement. After secularization, large tracts of land were granted to individuals and families and the rancho system was established. Cattle ranching dominated other agricultural activities and the development of the hide and tallow trade with the United States increased during the early part of this period. The Pueblo of San Diego was established during this period and Native American influence and control greatly declined. The Mexican Period ended when Mexico ceded California to the United States after the Mexican-American War of 1846-48.

## American

Soon after American control was established (1848-present), gold was discovered in California. The tremendous influx of American and Europeans that resulted quickly drowned out much of the Spanish and Mexican cultural influences and eliminated the last vestiges of de facto Native American control. Few Mexican ranchos remained intact because of land claim disputes and the homestead system increased American settlement beyond the coastal plain.

### **1.2.3 Record Search Results**

The archaeological inventory includes archival and other background studies in addition to Laguna Mountain's field survey of the project area. The archival research consisted of literature and record searches at local archaeological repositories, in addition to an examination of historic maps, and historic site inventories. This information was used to identify previously recorded resources and determine the types of resources that might occur in the survey area. The methods and results of the archival research are described below.

The records and literature search for the project was conducted at the South Coastal Information Center at San Diego State University and the San Diego Museum of Man. The records search included a one-mile radius of the project area to provide background on the types of sites that would be expected in the region (Appendix D). Copies of historic maps were provided by the South Coastal Information Center.

Twenty-three documented archaeological investigations have taken place in the vicinity of the project (Table 1). Most of these have been survey projects related to residential development. These studies indicate there was a variety of prehistoric and historic activity in the area. Records searches at the South Coastal Information Center and the San Diego Museum of Man indicated that the project area has been previously surveyed for road improvement projects related to Highway 67 and Highland Valley Road (Crafts 1991, 1992a, 1992b, Dominici 1987, Joyner 1990, 1991a, 1991b). The entire project area was surveyed for cultural resources by Joyner (1990) and testing was conducted at CA-SDI-12022 west of the project area to determine if cultural resources would be impacted by the realignment of Highland Valley Road (Joyner 1991a and 1991b). Site CA-SDI-12022 was identified as significant but testing did not cross the small seasonal drainage west of the current project area. Site CA-SDI-12022 is located west of the current project and is separated from the current project by a small seasonal drainage.

Forty-one archaeological sites have been identified through previous research within a one-mile radius of the project. Table 2 provides a summary of the types of sites present in the area. Most of these sites are prehistoric and include bedrock milling stations and occupation debris. This is a reflection of a large amount of prehistoric activity in the area. Two historic sites are also present in the area.

Historic research included an examination of a variety of resources. The current listings of the National Register of Historic Places were checked through the National Register of Historic Places website. The California Inventory of Historic Resources (State of California 1976) and the California Historical Landmarks (State of California 1992) were also checked for historic resources.

Historic map research indicated that the project area contained a structure in the past. The 1928 series of aerial photographs available at the County of San Diego Cartographic Department shows the project area as open grassland, but does not show any structures in the area. The 1942 edition of the Ramona 15' USGS Quadrangle also does not show any structures within the current project area. The 1954 edition of the San Pasqual 7.5' USGS Quadrangle shows a single structure within the project area halfway between the original alignment of Highland Valley Road and Dye Road on the western side of Highway 67. This map was based on an aerial photograph taken in 1949, suggesting the structure was built sometime between 1942 and 1949.

This structure also appears on the orthographic layer of the soil series maps made from aeriels taken in 1967-1968 (USDA 1973). The structure was still standing in April of 1984 based on the 1:200 scale County Topographic Survey maps, but it has since been demolished and no surface remains are present.

**Table 1. Archaeological Investigations within a One-Mile Radius of the Project Area**

| <b>Author</b>         | <b>Title</b>   | <b>Date</b> |
|-----------------------|--|-------------|
| Alter                 | Cultural Resources Report for the Historical Evaluation of the Proposed Juniper Street/Felicita Avenue CIP Widening Project, Escondido, CA 92025.  | 2002        |
| Alter and Gross       | Cultural Resources Survey for the Rancho Maria Lane Property, Ramona, San Diego County.  | 1992        |
| ASM, Inc              | An Archaeological Reconnaissance of the Duraznitos Lot Split TPM 16479.  | 1980        |
| Caltrans              | Negative Archaeological Survey Report First Addendum Improvement to the Intersection of Route 67 and Mussey Grade Road.  | 1989        |
| Carrico               | Archaeological Survey of Tentative Parcel Map 14361 Lot Split Ramona, California.  | 1978        |
| Corum                 | First Addendum Archaeological Survey and Extended Phase 1 Investigation Site CA-SDI-9609 San Diego County, California.   | 1983        |
| Crafts                | Historic Property Survey Report Dye Road and Highland Valley Road Intersection Route 67 Ramona, California, 11-SD-67, P.M. 21.1/21.7, 1121-161240.   | 1992        |
| Crafts                | Negative Archaeological Report Route 67 Dye Road.  | 1991        |
| Crafts                | Negative Archaeological Survey Report 11-SD-67 P.M. 21.1-21.7.   | 1992        |
| DeCosta               | A Report of an Extended Phase 1 Investigation at Sites CA-SDI-9151 and CA-SDI-9152; San Diego County, California, 11-SD-67, P.M. 19.6-20.2, 11212-186691.                                  | 1983        |
| DeCosta & Corum       | An Historical Property Survey Report for a Valle De Pamo Shoulder Widening Project 11-SD-67 P.M. 19.6-20.2 11212-186691 San Diego, CA.   | 1988        |
| Dominici              | Historic Property Survey 11-SD-67 P.M. 20.9 11359-190390.  | 1987        |
| Hector                | Archaeological Survey of the A.I.M. Churches Inc. Property.  | 1983        |
| Hector                | Archaeological Survey of the Stockton Property.  | 1983        |
| Hunt & Raven-Jennings | Results of a Data Recovery Program at Site CA-SDI-5493, The Holly Oaks Ranch Project, Ramona, California.  | 1998        |
| Joyner                | Addendum to Archaeological Investigations Conducted for the County of San Diego, Department of Public Works, Highland Valley Road Realignment Project-Reconnaissance and Test Excavations. | 1991        |
| Joyner                | Archaeological Investigations Conducted for the County of San Diego, Department of Public Works, Highland Valley Road Realignment Project-Reconnaissance and Test Excavations.             | 1991        |
| Joyner                | Cultural Resource Survey - Highland Valley Road.   | 1990        |
| Kelsay                | Improvement or Elimination of the Present Intersection of Route 67 and Mussey Grade Road.  | 1987        |
| Polan                 | An Archaeological Reconnaissance of Luelf Ranch.   | 1978        |
| PRC Toups Corp        | Draft Environmental Impact Report: Luelf Ranch Tentative Subdivision Map.  | 1919        |
| Smith                 | A Cultural Resource Assessment at the 400-Acre Luelf Ranch.  | 1990        |
| Smith                 | Results of an Archaeological Survey and the Evaluation of Cultural Resources at the Moen Lot Split Project.  | 1991        |
| TMI Environmental     | Cultural Resource Survey Report for Totem Enterprises.   | 1989        |

**Table 2. Cultural Resources within a One-Mile Radius of the Project Area**

| <b>Site Number</b>      | <b>Site Type</b>                    | <b>Site Dimensions</b> | <b>Report Reference</b> |
|-------------------------|-------------------------------------|------------------------|-------------------------|
| CA-SDI-5946             | Bedrock Milling Station             | 4m x 2m                | Berryman                |
| CA-SDI-5947             | Temporary camp with bedrock milling | 13.5m x 9.7m           | Berryman                |
| CA-SDI-6056/SDM-W-1896  | Bedrock Milling Station             | 10m x 9m               | Franklin & Rhodes       |
| CA-SDI-6057/SDM-W-1897  | Bedrock Milling Station             | 25m x 20m              | Franklin & Rhodes       |
| CA-SDI-6058/SDM-W-1898  | Bedrock Milling Station             | 40m x 15m              | Franklin & Rhodes       |
| CA-SDI-6059/SDM-W-1899  | Bedrock Milling Station             | 70m x 40m              | Franklin & Rhodes       |
| CA-SDI-6060/SDM-W-1900  | Bedrock Milling Station             | 30m x 15m              | Franklin & Rhodes       |
| CA-SDI-6061/SDM-W-1901  | Bedrock Milling Station             | 15m x 10m              | Franklin & Rhodes       |
| CA-SDI-6062/SDM-W-1902  | Bedrock Milling Station             | 15m x 40m              | Franklin & Rhodes       |
| CA-SDI-6063/SDM-W-1903  | Bedrock Milling Station             | 20m x 10m              | Franklin & Rhodes       |
| CA-SDI-6064/SDM-W-1904  | Bedrock Milling Station             | 20m x 10m              | Franklin & Rhodes       |
| CA-SDI-6065/SDM-W-1905  | Lithic scatter with bedrock milling | 70m x 45m              | Franklin & Rhodes       |
| CA-SDI-6066/SDM-W-1906  | Lithic scatter with bedrock milling | 40m x 35m              | Franklin & Rhodes       |
| CA-SDI-8022             | Temporary camp with bedrock milling | 150m x 100m            | Graham                  |
| CA-SDI-9151             | Temporary camp with bedrock milling | 30m x 150m             | Apple et al             |
| CA-SDI-9682             | Temporary camp with bedrock milling | 100m x 45m             | Alter & Gross           |
| CA-SDI-9709/SDM-W-3346  | Lithic Scatter                      | 10m x 5m               | Hector & Wade           |
| CA-SDI-12022/SDM-W-4593 | Bedrock Milling Station             | 332m x 142m            | Joyner et al.           |
| CA-SDI-12249            | Temporary camp with bedrock milling | 73m x 37m              | Smith                   |
| CA-SDI-12693/SDM-W-3331 | Bedrock milling station             | 5m x 3m                | Alter & Gross           |
| CA-SDI-17168            | Bedrock milling station             | 30m x 35m              | Giletti                 |
| CA-SDI-17169            | Bedrock milling station             | 57m x 30m              | Giletti                 |
| CA-SDI-17170            | Lithic scatter with bedrock milling | 108m x 180m            | Giletti                 |

**Table 2. Cultural Resources within a One-Mile Radius of the Project Area (Continued)**

| <b>Site Number</b> | <b>Site Type</b>                         | <b>Site Dimensions</b> | <b>Report Reference</b> |
|--------------------|--|------------------------|-------------------------|
| CA-SDI-17171       | Lithic scatter with bedrock milling      | 300m x 350m            | Giletti                 |
| CA-SDI-17172       | Bedrock milling station                  | 72m x 78m              | Giletti                 |
| CA-SDI-17174       | Bedrock milling station                  | 46m x 45m              | Giletti                 |
| CA-SDI-17176       | Bedrock milling station                  | 4m x 3m                | Giletti                 |
| CA-SDI-17177       | Lithic scatter with bedrock milling      | 150m x 400m            | Giletti                 |
| CA-SDI-17178       | Lithic scatter with bedrock milling      | 110m x 135m            | Giletti                 |
| CA-SDI-17179       | Bedrock milling station                  | 35m x 20m              | Giletti                 |
| CA-SDI-17180       | Bedrock milling station                  | 12m x 9m               | Giletti                 |
| CA-SDI-17181       | Bedrock milling station                  | 4m x 5m                | Giletti                 |
| CA-SDI-17182       | Bedrock milling station                  | 1.2m x 0.75m           | Giletti                 |
| CA-SDI-17185       | Bedrock milling station                  | 6m x 50m               | Giletti                 |
| CA-SDI-17186       | Lithic scatter with bedrock milling      | 75m x 105m             | Giletti et al           |
| CA-SDI-17187       | Bedrock milling station                  | 2m x 5m                | Giletti                 |
| CA-SDI-17188       | Bedrock milling station                  | 14m x 28m              | Giletti                 |
| CA-SDI-17190       | Lithic scatter with bedrock milling      | 50m x 35m              | Giletti                 |
| CA-SDI-17192       | Historic Privies/Dumps/Trash scatter     | 3m x 3m                | Giletti                 |
| SDM-W-206          | Habitation Site with Rock Features       | 1/2 acre               | Rogers                  |
| P-37-019215        | Historic road with associated structures | 18ft x 5mi             | Carrico                 |

## **1.3 Applicable Regulations**

Resource importance is assigned to districts, sites, buildings, structure, and objects that possess exceptional value or qualify illustrating or interpreting the heritage of San Diego County in history, architecture, archaeology, engineering, and culture. A number of criteria are used in demonstrating resource importance. Specifically, criteria outlined in CEQA and the San Diego County Local Register provide the guidance for making such a determination. The following sections(s) details the criteria that a resource must meet in order to be determined important.

### **1.3.1 California Environmental Quality Act (CEQA)**

According to CEQA (§15064.5a), the term “historical resource” includes the following:

- (1) A resource listed in, or determine to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code SS5024.1, Title 14 CCR. Section 4850 et seq.).
- (2) A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements of section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resources as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- (3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code §5024.1, Title 14, Section 4852) including the following:
  - (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 person important in our past;
  - (C) Embodies the distinctive characteristics of a type, period, region, or individual, or possesses high artistic value; or
  - (D) Has yielded, or may be likely to yield, information important in prehistory or history.
- (4) The fact that a resource is not listed in, or determined eligible for listing the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in sections 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code section 5020.1(j) or 5024.1.

According to CEQA (§15064.5b), a project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. CEQA defines a substantial adverse change as:

- (1) Substantial adverse change in the significance of an historical resource means 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.
- (2) The significance of an historical resource is materially impaired when a project:
  - (A) 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 of Historical Resources; or
  - (B) 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 historical or culturally significant; or
  - (C) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

Section 15064.5(c) of CEQA applies to effects on archaeological sites and contains the following additional provisions regarding archaeological sites:

- (1) When a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource, as defined in subsection (a).
- (2) If a lead agency determines that the archaeological site is an historical resource, it shall refer to the provisions of Section 21084.a of the Public Resources Code, and this section, Section 15126.4 of the Guidelines, and the limits contained in Section 21083.2 of the Public Resources Code do not apply.
- (3) If an archaeological site does not meet the criteria defined in subsection (a), but does meet the definition of a unique archaeological resource in Section 21083.2 of the Public Resources Code, the site shall be treated in accordance with the provisions of section 21083.2. The time and cost limitations described in Public Resources Code Section 21083.2 (c-f) do not apply to surveys and site evaluation activities to determine whether the project location contains unique archaeological resources.
- (4) If an archaeological resource is neither a unique archaeological nor an historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment. It shall be sufficient that both the resource and the effect on it are noted

in the Initial Study or EIR, if one is prepared to address impacts on other resources, but they need not be considered further in the CEQA process.

Section 1564.5 (d) & (e) contain additional provisions regarding human remains. Regarding Native American human remains, paragraph (d) provides:

- (d) When an initial study identifies the existence of, or the probably likelihood, of Native American human remains within the project, a lead agency shall work with the appropriate Native Americans as identified by the Native American Heritage Commission as provided in Public Resources Code §5097398. The applicant may develop an agreement for treating or disposing of, with appropriate dignity, the human remains and any items associated with Native American burials with the appropriate Native Americans as identified by the Native American Heritage Commission. Action implementing such an agreement is exempt from:
  - (1) The general prohibition on disinterring, disturbing, or removing human remains from any location other than a dedicated cemetery (Health and Safety Code Section 7050.5).
  - (2) The requirement of CEQA and the Coastal Act.

### **1.3.2 San Diego County Local Register of Historical Resources (Local Register)**

The County requires that resource importance be assessed not only at the State level as required by CEQA, but at the local level as well. If a resource meets any one of the following criteria as outlined in the Local Register, it will be considered an important resource.

- (1) Is associated with events that have made a significant contribution to the broad patterns of San Diego County's history and cultural heritage;
- (2) Is associated with the lives of persons important to the history of San Diego County or its communities;
- (3) Embodies the distinctive characteristics of a type, period, San Diego County region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- (4) Has yielded, or may be likely to yield, information important in prehistory or history.

### **1.3.3 San Diego County Resource Protection Ordinance (RPO)**

The County of San Diego's RPO protects significant cultural resource. The RPO defines "Significant Prehistoric or Historic Sites" as follows:

Sites that provide information regarding important scientific research questions about prehistoric or historic activities that have scientific, religious, or other ethnic value of local, regional, State, or Federal importance.

Such locations shall include, but not be limited to:

- (1) Any prehistoric or historic district, site, interrelated collection of features or artifacts, building, structure, or object either:

- (aa) Formally determined eligible or listed in the National Register of Historic Placed by the Keeper of the National Register; or
- (bb) To which the Historic Resource (“H” Designator) Special Area Regulations have been applied; or
- (2) One-of-a-kind, locally unique, or regionally unique cultural resources which contain a significant volume and range of data and materials; and
- (3) Any location of past or current sacred religious or ceremonial observances which is either:
  - (aa) Protected under Public Law 95-341, the American Indian Religious Freedom Act or Public Resources Code Section 5097.9, such as burial(s), pictographs, petroglyphs, solstice observatory sites, sacred shrines, religious ground figures or,
  - (bb) Other formally designated and recognized sites which are of ritual, ceremonial, or sacred value to any prehistoric or historic ethnic group.

The RPO does not allow non-exempt activities or uses damaging to significant prehistoric or historic lands on properties under County jurisdiction. This includes development, trenching, grading, clearing and grubbing, or any other activity or use damaging to significant prehistoric or historic lands. The only exempt activity is scientific investigation with an approved research design prepared by an archaeologist certified by the Society of Professional Archaeologists. All discretionary projects are required to be in conformance with applicable County Standards related to cultural resources, including the noted RPO criteria on prehistoric and historic sites. Non-compliance would result in a project that is inconsistent with County standards.

## **2.0 GUIDELINES FOR DETERMINING SIGNIFICANCE**

Determining resource importance is a two-step process. First, the cultural environment must be defined. Then the criteria for determining importance must be applied to the resource. The following subchapters provide guidance on this process and detail the cultural environment and criteria that is typically used in evaluating resources.

### **2.1 Defining The Cultural Environment**

San Diego County has more than 23,000 recorded sites as of September 2006 and this number continues to grow. The cultural environment consists of the remains of prehistoric and historic human behaviors. When cultural resources have been identified, the cultural environment has been defined and the baseline condition set. Cultural resources include archaeological and historic sites, structures, and objects, as well as traditional cultural properties. The following is a list of components that can make up the cultural environment.

#### **2.1.1 Building**

A building is a resource, such as a house, barn, church, factory, hotel, or similar structure created principally to shelter or assist in carrying out any form of human activity. “Building” may also be used to refer to a historically and functionally related unit, such as a courthouse and jail or a house and barn. The Somers-Linden Farmstead (Victorian), the McRae/Albright Ranch House (Victorian), the Holmgren House (Moderne), and the County Administration Center (Spanish Colonial Revival) are examples of buildings in the County of San Diego.

Special consideration should be given to moved buildings, structures, or objects, cultural resources achieving significance within the past fifty (50) years, and reconstructed buildings. Context, time, and original form are integral to historic preservation. However, it is important to recognize resources outside of the required characteristics for the history that they embody.

#### **Moved Buildings, Structures, or Objects**

The retention of historical resources on site should be encouraged and the non-historic grouping of historic buildings into parks or districts would be discouraged. However, it is recognized that moving an historic building, structure, or object is sometimes necessary to prevent its destruction, and is appropriate in some instances. An historical resource should retain its historic features and compatibility in orientation, setting, and general environment.

#### **Cultural Resources Achieving Significance within the Past Fifty (50) Years**

In order to understand the historical importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than fifty (50) years old may be considered if it can be determined that sufficient time has passed to understand its historical importance.

## **Reconstructed Buildings**

A reconstructed building less than fifty (50) years old may be eligible if it embodies traditional building methods and techniques that play an important role in a community's historically rooted beliefs, customs, and practices. An example of a reconstructed building is an American Indian sweat lodge.

### **2.1.2 Site**

A site is the location of a significant event, a prehistoric or historic occupation or activity, or a building or structure, whether standing, ruined, or vanished, where the location itself possessed historical, cultural, or archaeological value regardless of the value of any existing building, structure, or object. A site need not be marked by physical remains if it is the location of a prehistoric or historic event, and if no buildings, structures, or objects marked it at that time. Examples of such sites are trails, designed and traditional landscapes, battlefields (San Pasqual Battlefield), homestead sites, habitation sites (Village of Pamo), American Indian ceremonial areas (Gregory Mountain), petroglyphs, pictographs, and traditional cultural places.

### **2.1.3 Structure**

The term "structure" is used to describe a construction made for a functional purpose rather than creating human shelter. Examples of structures include mines, flumes, roads, bridges, dams, and tunnels.

### **2.1.4 Object**

The term "object" is used to describe those constructions that are primarily artistic in nature or are relatively small in scale and simply constructed, as opposed to a building or structure. Although it may be moveable by nature or design, an object is associated with a specific setting or environment. Objects should be in a setting appropriate to their significant historic use, role, or character. Objects that are relocated to a museum are not eligible for listing in the Local Register. Examples of objects include fountains, monuments, maritime resources, sculptures, and boundary markers.

### **2.1.5 Landscapes and Traditional Cultural Properties**

"Landscapes" vary in size from small gardens to national parks. In character, they range from designed to vernacular, rural to urban, and agricultural to industrial. A cultural landscape is a geographic area which, because of a unique and integral relationship between the natural and cultural environments, has been used by people; shaped or modified by human activity, occupation or invention; or is infused with significant value in the belief system of a culture or society. Estate gardens, cemeteries, farms, quarries, mills, nuclear test sites, suburbs, and abandoned settlements, and prehistoric complexes, all may be considered under the broad category of cultural landscapes. Landscapes provide a distinct sense of time and place. Traditional cultural landscapes (Traditional Cultural Properties) can also consist of related archaeological and ethnographic features and places (see below for definition of a prehistoric district).

### **2.1.6 Prehistoric and Historic Districts**

Districts are united geographic entities that contain a concentration of historic buildings, structures, objects, and/or sites united historically, culturally, or architecturally. Districts are defined by precise geographic boundaries; therefore, districts with unusual boundaries require a description of what lies immediately outside the area, in order to define the edge of the district and to explain the exclusion of adjoining areas. Camp Lockett in Campo is an example of a historic district. The Village of Pamo is an example of a prehistoric Indian rancheria that represents a traditional cultural landscape that could be a district, consisting of the places used and inhabited by a traditional culture. A traditional cultural landscape defined as a district could include a village site, related milling features, stone quarries and lithic tool process areas, ceremonial locations and landmarks, and temporary or seasonal camps. Together, these represent a traditional cultural landscape.

## **2.2 Criteria for the Determination of Resource Importance**

A number of criteria are used in identifying significant historic/archaeological resources and are based upon the criteria for inclusion in the San Diego County Local Register. Significance is assigned to districts, sites, buildings, structures, and objects that possess exceptional value or quality illustrating or interpreting the heritage of San Diego County in history, architecture, archaeology, engineering, and culture.

The San Diego County Register was modeled after the California Register. As such, a cultural resource is determined significant if the resource is listed in, or determined to be eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, or the San Diego County Register of Historical Resources. Any resource that is significant at the National or State level is by definition significant at the local level.

The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources; or is not included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code), or is not identified in an historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that a resource may be historical as defined in Public Resources Code section 5020.1(j) or 5024.1.

The following criteria must be considered when evaluating a resource's importance. The first four criteria were derived from the significance criteria found in the California Environmental Quality Act and the San Diego County Register of Historical Resources (Ordinance No.9493; San Diego County Administrative Code §396.7). The San Diego County Register is similar to both the National Register and California Register but is different in that significance is evaluated at the local level.

1. Resources associated with events that have made a significant contribution to the broad patterns of California or San Diego County's history and cultural heritage. Examples include resources associated with the Battle of San Pasqual (Mexican-American War, 1846) or gold mining in the Julian area (1870s), or a Kumeyaay settlement in the Cuyamaca Valley. Each of these resources would be considered significant because it is

associated with an event that has made a significant contribution to the broad patterns of San Diego County's history and cultural heritage.

2. Resources associated with the lives of persons important to our past, including the history of San Diego County or its communities. Resources that are associated with the life of George W. Marston (Benefactor/Merchant/Civic Leader), Kate Sessions (Horticulturalist), John D. Spreckels (Investor/Developer), Ellen Browning Scripps (Philanthropist), Ah Quin (Chinese Merchant/Labor Contractor), Manuel O. Medina (Pioneer of the Tuna Industry), Jose Manuel Polton (Hatam [Kumeyaay Captain of the Florida Canyon Village]), or Jose Pedro Panto (Kumeyaay Captain of the San Pasqual Pueblo) illustrates this criteria because this list identifies examples of individuals that are important to the history of San Diego County or its communities.
3. Resources that embody the distinctive characteristics of a type, period, region (San Diego County), or method of construction, or represents the work of an important creative individual, or possesses high artistic values. Resources representing the work of William Templeton Johnson (Architect – Balboa Park, Serra Museum), Irving Gill (Architect – Bishop's School), Lilian Rice (Rancho Santa Fe), or Hazel Waterman (Designer – Estudillo Adobe Restoration) would be considered significant because they represent the work of an important creative individual; or if a resource is identified as a Queen Anne, Mission Revival, Craftsman, Spanish Colonial, or Western Ranch Style structure, it would be significant because it embodies the distinctive characteristics of a type or period.
4. Resources that have yielded or may be likely to yield, information important in prehistory or history. Most archaeological resources contain information; however the amount of information varies from resource to resource. For example, a small lithic scatter will contain information, but it will be on a much more limited basis than that of a village or camp site. The information may be captured during initial recordation and testing of the site or may require a full data recovery program or additional treatment/mitigation. **Any site that yields information or has the potential to yield information is considered a significant site.** Most resources will be considered significant because they contain some information that contributes to our knowledge of history or prehistory. The criteria used to evaluate a single resource is the same criteria used to evaluate cumulative impacts to multiple resources outside the boundary of a project.
5. Although districts typically will fall into one of the above four categories, because they are not specifically identified, the following criterion is included which was obtained from the National Register:

Districts are significant resources if they are composed of integral parts of the environment not sufficiently significant by reason of historical association or artistic merit to warrant individual recognition, but collectively compose an entity of exceptional historical or artistic significance, or outstandingly commemorate or illustrate a way of life or culture. A traditional cultural landscape is an example of a prehistoric district because individual sites must be considered within the broader context of their association with one another.

6. Resource Protection Ordinance. Cultural resources must be evaluated for both the California Environmental Quality Act as outlined in criteria 1-4 above and the Resource Protection Ordinance pursuant to Article III of the ordinance. Under the Resource Protection Ordinance, cultural resources are considered “RPO” significant if they meet the definition of a RPO "Significant Prehistoric or Historic Site", as set forth in Section 3.1 above.
7. Human remains are considered “highly sensitive” by the County. As such, human remains require special consideration and treatment. Regulations require that if human remains are discovered, the County Coroner shall be contacted. In the event that 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 in order to determine proper treatment and disposition of the remains. The following criterion was included pursuant to the California Environmental Quality Act (§15064.5) and California State Code (PRC5097.98 and HSC7050.5). As such, a resource shall be considered significant if it contains any human remains interred outside of a formal cemetery. Mitigation measures will be developed on a case by case basis by the County archaeologist and the archaeological consultant. In addition, it is of the utmost importance to tribes that human remains be avoided whenever feasible.
8. Integrity is the authenticity of a resource’s physical identity evidenced by the survival of characteristics that existed during the resource’s period of significance. The evaluation of integrity is somewhat of a subjective judgment, but it must always be grounded in an understanding of a property’s physical features and how they relate to its historical associations or attributes and context. Resources must retain enough of their historical character or appearance to be recognizable as historical resources and to convey the reasons for their significance. An evaluation of integrity is an essential part of determining significance for historical resources such as building, structures, and districts.

Integrity is evaluated through the assessment of a cultural resource’s attributes, and may include location, design, setting, materials, workmanship, feeling, and association. It must be judged with reference to the particular criteria under which a resource is proposed for eligibility (structural, architectural, artistic, historic location, archaeological site, historic district). Alterations over time to a resource or historic changes in its use may themselves have historical, cultural, or architectural significance.

Attributes - Attributes are those distinctive features that characterize a resource. They should be evaluated and compared to other properties of its type, period, or method of construction.

Location - Location is the place where the property was constructed or the place where the historical event occurred. The actual location of an historical property, complemented by its setting, is particularly important in recapturing the sense of historical events and persons.

**Design** - Design is the combination of elements that create the historical form, plan, space, structure, and style of a property. This includes such elements as organization of space, proportion, scale, technology, ornamentation, and materials. Design can also apply to districts and to the historical way in which the buildings, sites, or structures are related. Examples include spatial relationships between major features; visual rhythms in a streetscape or landscape plantings; the layout and materials of walkways and roads; and the relationship of other features, such as statues, water fountains, and archaeological sites.

**Setting** - Setting is the physical environment of an historical property. It refers to the historical character of the place in which the property played its historical role. It involves how, not just where, the property is situated and its historical relationship to surrounding features and open space. The physical features that constitute the historical setting of an historical property can be either natural or manmade and include such elements as topographical features, vegetation, simple manmade paths or fences and the relationships between buildings and other features or open spaces.

**Materials** - Materials are the physical elements that were present during the development period and are still present or, if materials have been replaced, the replacement(s) must have been based on the original. The property must be an actual historical resource, not a re-creation. For example, a Victorian style wood-frame dwelling that has been covered with reconstructed stucco has lost its integrity of materials. Conversely, an adobe wall that has been reconstructed with similar adobe mud, as opposed to adobe-simulate concrete, would retain its integrity of materials.

**Workmanship** - Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history. It is the evidence of the artisans' labor and skill in constructing or altering a building, structure, object, or site. It may be expressed in vernacular methods of construction and plain finishes or in highly sophisticated configurations and ornamental detailing. Examples of workmanship in historic buildings include tooling, carving, painting, graining, turning, and joinery. Examples of workmanship in precontact contexts include pottery, stone tools, basketry, rock art, bedrock milling, and stone structures.

To assess integrity one must:

- (1) Define essential physical features that must be present to a high degree for a property to represent its significance;
- (2) Determine whether the essential physical features are apparent enough to convey the property's significance; and
- (3) Compare the property with similar properties in the locally significant theme.

A property that is significant for its historical association should retain the essential physical features that made up its character or appearance during the period of its association with the important event, historical pattern, or person(s). If the property is a site where there are no material cultural remains, such as a battlefield, the setting must be

intact. If the historical building associated with the event, pattern, or person no longer exists, the property has lost its historical integrity.

A property important for illustrating a particular architectural style or construction technique must retain the physical features that constitute that style or technique. A property that has lost some historical materials or details can be considered if it retains the majority of the features that illustrate its style in terms of the massing, spatial relationships, proportion, pattern of windows and doors, texture of materials, and ornamentation. A property should not be considered if it retains some basic features conveying massing, but has lost the majority of the features that once characterized its style. Normally changes to a structure that are reversible will not affect integrity because they will be less than significant.

Properties being considered for the first five criteria above must not only retain the essential physical features, but the features must be visible enough to convey their significance and historical identity. This means that even if a property is physically intact, its integrity is questionable if its significant features are concealed under modern construction. Archaeological properties are the exception to this – by nature they may not require visible features to convey their significance.

Note: Unless a resource is determined to be “not significant” based on the above criteria, it will be considered a significant resource. If it is agreed to forego significance testing on cultural sites, the sites will be treated as significant resources and must be preserved through project design. In addition, a treatment plan must be prepared that will include preservation of cultural resources.

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## **3.0 RESEARCH DESIGN**

### **3.1 Survey Research Design**

The goal of this study is to identify any cultural resources located within the project area so that the effects of the project on these resources can be assessed. To accomplish this goal, background information was examined and assessed, and a field survey was conducted to identify cultural remains. Based on the records search and historic map check, the cultural resources within the project could include both historic and prehistoric resources. A historic-age structure appears in the project area on early maps of the area. Prehistoric cultural resources could include bedrock milling and associated cultural material associated with the bedrock outcrops in the area.

### **3.2 Testing Research Design**

The goal of the testing program was to assess the potential effects of the project on site CA-SDI-17299. To accomplish this goal, background information was examined and assessed, and a testing program was conducted to identify the extent and integrity of the site.

### **3.3 Integrity**

Resource integrity is a critical part of evaluation. For archaeological purposes, integrity usually refers to the preservation of artifact associations and stratigraphy. Bioturbation and other natural factors affecting artifact associations are common in the San Diego region, and much of the region area has also been affected by agriculture and urban development.

### **3.4 Native American Heritage Concerns**

Native American heritage concerns need to be included in significance evaluations as part of State and County policy. Native American concerns particularly focus on religious sites, sites that contain human remains, and sites with items used for religious purposes.

### **3.5 Research Potential**

Research potential is the most applicable of the California Register criteria for archaeological resources. To establish a framework to evaluate if a site may be likely to yield information important in prehistory or history, important research questions are established along with data needs. These research criteria are established below.

### **3.6 Theoretical Orientation**

As a social science, archaeology seeks to understand human behavior. Because of the nature of the archaeological record, archaeologists look at behavior in terms of cultural patterns, and environmentally oriented archaeologists attempt to explain these patterns in the context of various and changing natural and social environments. While much of the past archaeological research in San Diego County has focused on reconstructing culture change over time or “culture

history,” new theoretical ideas in the 1960s and 1970s highlighted the importance of the environment and shifted the emphasis of archaeology from reconstructing history to understanding culture (Binford 1989).

The fundamental theoretical orientation that underlies this study, and much of the work that has been conducted in San Diego County to date, is cultural materialism. “Cultural materialism” as used here essentially holds that practical, survival, and economic aspects of culture ultimately determine the success or the spread of specific behavior patterns (Hayden 1993). Cultural ecology and environmental archaeology are forms of cultural materialism, emphasizing the role of the environment as a practical controlling factor on culture and human behavior. The perspectives of cultural materialism and cultural ecology are appropriate for the study area because of the direct relationship between hunter-gatherer economy and the environment and because these concepts represent a continuation of recent thinking in the region. Cultural materialism is also appropriate for study of the historical archaeological resources because it focuses on relationships within systems.

### **3.7 Research Topics, Implications, and Data Requirements**

#### **3.7.1 Prehistoric Subsistence**

Reconstructing the subsistence economy of prehistoric hunter-gatherers is a key question for cultural ecology. Historic period hunter-gatherers typically occupied extreme environments and/or had been heavily impacted by European colonial expansion. As a consequence, understanding the cultural adaptations of hunter-gatherers in more productive environments is heavily reliant on archaeological data.

For the most part, subsistence during the Late Prehistoric in San Diego County is fairly well understood through the ethnographic record. Ethnographic information has provided a level of detail beyond the archaeological record, but certain aspects are poorly known.

Based on the presence of groundstone and an arrow point at site CA-SDI-17299, it is likely that subsistence was focused on inland terrestrial resources. This site is located well beyond the 10-kilometer coastal foraging radius suggested by Jones (1992).

- How does site subsistence pattern relate to resource availability?

Hypothesis: The general pattern is one of using available resources: Acorn processing subsistence technologies and small mammal procurement should dominate the assemblage. Marine resources, if present, will represent a minimal component of the assemblage.

Data Needs:

- Stratigraphic contexts that indicate the sites contain interpretable cultural strata that can be taken to represent the results of relatively short-term occupations or a single occupation that can be compared to other single occupation sites.
- Material suitable for establishing chronology from these contexts.

- Vertebrate and invertebrate faunal material, along with tools that reflect subsistence focus and activities such as projectile points, bifaces, and milling tools.
- Sufficient quantities of ecofactual material to allow patterns to be defined. To obtain a statistically valid sample, quantities of 50 items per m<sup>3</sup> are required.

### 3.7.2 Prehistoric Chronology

Chronology and aspects of culture history have long been the subjects of archaeological research in the San Diego region. Late Prehistoric period sites are common in the region, and are relatively easily identified through the presence of bedrock milling, ceramics, and bow and arrow technology. Early Archaic period sites are more difficult to recognize and perhaps less common in the area. Furthermore, while Archaic period sites have been scrutinized in coastal regions, few have been studied in depth in inland areas.

- Is the Archaic period represented at site CA-SDI-17299 and if so, how does this component compare to Late Prehistoric assemblages at the same location?

Hypothesis: Due to the arrow point associated with this prehistoric site, it is unlikely the site represents Paleoindian occupation. If present, Archaic Period evidence will be represented by dart points, differences in lithic material selection and reduction technology, and flaked lithic tool types.

Data Needs:

- Stratigraphic contexts that indicate the sites contain interpretable cultural strata that can be taken to represent the results of relatively short-term occupations or a single occupation that can be compared to other single occupation sites.
- Material suitable for radiocarbon dating from these contexts.
- Biface tools and artifacts representative of activities carried out at the site. To obtain a statistically valid sample, quantities of 50 items per m<sup>3</sup> are required.

### 3.7.3 Prehistoric Mobility and Settlement

Settlement Patterns have been the subject of considerable research in San Diego County. This topic contributes to the definition of settlement systems and the study of their change through time, both elements important to local prehistoric studies. The interaction of cultural groups and the natural landscape is an important aspect of human behavior. Just as cultural geographers study current land use patterns to aid in urban planning, the study of prehistoric settlement patterns can provide insight into past strategies of interaction with the environment.

Most settlement pattern studies focus on the relationship between natural resources and areas of human occupation. A general assumption is that important resources for subsistence create a draw for settlement, and that people will tend to locate near important water and food resources. Other types of sites may also be located near resources, but may not be related to habitation.

These special task sites, such as isolated bedrock milling stations and lithic procurement/reduction areas, also provide important evidence on how people used the natural landscape.

An examination of resources used at a site and their source provenience is a means of examining mobility. Direct procurement, or travel over relatively large distances to procure resources is one aspect of mobility. Another aspect relates to territoriality. A seasonal round type of mobility strategy with bipolar village locations is often the model for Late Prehistoric mobility.

- How does CA-SDI-17299 fit into the regional settlement system through time?

Hypothesis: Site patterning in relation to water, landform, and lithic resources is expected. Exchange played a very minor role in resource procurement and, although mobility provided a range of available resources at different time intervals, the sites reflect foraging and processing behavior and the local resources of the area. Roughly 90% of the assemblage will represent local materials within a 10-km foraging radius.

#### Data Needs:

- Stratigraphic contexts that indicate the sites contain interpretable cultural strata that can be taken to represent the results of relatively short-term occupations or a single occupation that can be compared to other single occupation sites.
- Material suitable for chronological control from these contexts.
- Artifacts representative of activities carried out at the sites. To obtain a statistically valid sample, quantities of 50 items per m<sup>3</sup> are required.
- Sufficient quantities of source specific lithic material to allow patterns to be defined. To obtain a statistically valid sample, quantities of 50 items per m<sup>3</sup> are required.

## **4.0 ANALYSIS OF PROJECT EFFECTS**

### **4.1 Methods**

#### **4.1.1 Survey Methods**

The records and literature search for the project was conducted at the South Coastal Information Center of the California Archaeological Inventory at San Diego State University and the San Diego Museum of Man. This records search included site records and reports for the project area and a one- mile radius of the project along with information on potential historic resources.

The survey of the project area was conducted on January 13, 2005 by Mr. Andrew R. Pignolo, RPA. The project was surveyed on foot using 10 to 15 meter transect intervals. The project area is dominated by non-native grasses. Surface visibility was approximately 50% over most of the property, but rodent burrows and other clearings provided visibility in grass covered areas. No other constraints to the survey were present and the survey adequately served to identify cultural resources within the project area.

Cultural resources identified during the survey were recorded on State of California, Department of Parks and Recreation forms and are included in Appendix E.

#### **4.1.2 Test Methods**

The goal of the testing and evaluation program was to assess the integrity and content of the prehistoric site CA-SDI-17299 within the project area. Testing at CA-SDI-17299 included site mapping, surface collection, and subsurface excavation to determine if a subsurface component is present.

Ms. Elizabeth Davidson, RPA, and Mr. Spencer Bietz conducted the testing program on March 15, 2010. Mr. Justin Linton of Red Tail Monitoring & Research, Inc. served as Native American Monitor. During the inventory phase, the site was initially surveyed using 10-15m parallel transects. The testing and evaluation phase began with a re-survey of the site area using 2-3 m interval parallel transects. Surface artifacts marked with pin flags and mapped using a GPS unit. All surface artifacts were assigned a collection number and bagged and collected during the testing program.

All site records were updated with the testing results on State of California, Department of Parks and Recreation forms. These forms are included in Appendix E. Photographs and project records for the testing program will be temporarily curated at Laguna Mountain until final curation arrangements can be made at the San Diego Archaeological Center or another appropriate regional repository.

A total of nine shovel test pits (STPs) were excavated at CA-SDI-17299 to determine if a subsurface deposit was present and to establish the boundary of the site. STPs were set out in cardinal directions across the site area. STPs were manually excavated circular test pits measuring 30 cm in diameter. STPs were excavated in 10 cm arbitrary, contour levels. The goal of STP placement was to test the areas within the site most likely to contain subsurface artifacts. All excavated soil was passed through 1/8-inch mesh hardware cloth and dry-screened in the field. The STP data indicated there was no subsurface deposit at CA-SDI-17299.

#### **4.1.3 Curation**

Photographs, artifacts, and project records for this inventory will be temporarily curated at Laguna Mountain until final curation arrangements can be made at the San Diego Archaeological Center or another appropriate regional repository.

#### **4.1.4 Native American Participation**

The survey was conducted in 2005 before Native American participation in the survey was required by the County. Mr. Linton, a Native American from the Santa Ysabel Band of Mission Indians, participated in this study as an archaeologist, assisted with the report preparation, and was aware of the survey results.

Native American involvement during the testing phase included contacting Red Tail Monitoring and Research, Inc. who provided Mr. Justin Linton as the Native American Monitor during the testing phase.

## **4.2 Survey Results**

One archaeological site CA-SDI-17299 (SJ-S-1) was identified within the project area during the survey (Figure 4). The cultural resources observed included 1 bifacial mano, 1 milky quartz Cottonwood Triangle projectile point, and three Santiago Peak Volcanic interior flakes. Site CA-SDI-12022 is located west and well outside the current project area. A seasonal drainage separates the project area from this site area. Based on previous testing by Joyner (1991a and 1991b), lack of cultural material identified during the current survey, and the separation of the natural drainage, there is no reason to anticipate material from CA-SDI-12022 within the current project area.

### **4.2.1 Survey Results**

CA-SDI-17299 consists of a prehistoric temporary camp with associated surface artifacts. The site is just south and southwest of a cul-de-sac along the old alignment of Highland Valley Road. The site is on a slight rise near a standing cross in the northeastern portion of the project area. It is approximately 20 m north/south by 30 m east/west. Depth is unknown, but the alluvial soils and the concentration of artifacts indicate potential for a subsurface deposit. Surface artifacts include 1 bifacial mano fragment, 1 milky quartz Cottonwood Triangle projectile point (Figure 5), and three Santiago Peak Volcanic interior flakes. Site integrity is only fair due to the disturbance associated with past intensive agricultural use of the project area. Grading related to

**Figure 4**

**Project Location and Associated Cultural Resources**

**(Confidential figure located in Appendix F)**

the old alignment of Highland Valley Road has also impacted the site area. Site CA-SDI-17186 is located to the north and additional bedrock outcrops are located to the northeast of the site. There is a possibility that CA-SDI-17299 is a portion of a larger site extending off project to the north.

**Figure 5. Projectile Point from the Surface of Site CA-SDI-17299**



The location of the structure of the historic age was identified. Landscaping in the area is limited, appears young, and does not reflect a historic resource. The structure has been completely removed and a pile of dirt with almost no building debris is present in the area. Based on the relatively recent age of the structure, the fact that both septic systems and trash removal would have been likely by the mid 1940s, and the fact that the structure has been completely removed, there appears to be little chance that material of historic age remains subsurface.

## 4.3 Testing Results

### 4.3.1 Site Structure and Surface Collection Results

Testing at CA-SDI-17299 included surface collection, site mapping, and the excavation of nine STPs (Figure 6). The site area was relocated during the testing program as previously recorded. The area was covered by low annual grass and surface visibility was approximately 60 percent (Figure 7). The surface walkover resulted in the identification of eight surface artifacts and a slight expansion of the site area. The previously recorded mano fragment was not relocated during the resurvey. The final site size based on the distribution of surface artifacts was 90 m north/south by 30 m east/west.

All of the artifacts recovered during surface collection were flaked lithic debitage fragments. The previously recorded mano fragment was not relocated during the resurvey and the projectile point had previously been collected. Table 3 provides a summary of the surface collection results. Artifacts were sparsely distributed over the large site area, but were slightly concentrated near the top of a very low rise within the site (See Figure 6).

**Table 3. Surface Collection Results**

| <b>Catalog #</b> | <b>Location Shot#</b> | <b>Artifact Type</b> |
|------------------|-----------------------|----------------------|
| CA-SDI-17299-2   | Shot #1               | 1 Flake              |
| CA-SDI-17299-3   | Shot #2               | 1 Flake              |
| CA-SDI-17299-4   | Shot #3               | 1 Flake              |
| CA-SDI-17299-5   | Shot #4               | 2 Angular Waste      |
| CA-SDI-17299-6   | Shot #5               | 1 Angular Waste      |
| CA-SDI-17299-7   | Shot #6               | 1 Angular Waste      |
| CA-SDI-17299-8   | Shot #7               | 1 Flake              |

In addition to the surface collection, the excavation of 9 STPs over the site area resulted in the recovery of a single flake from the 0-10 cm level of STP 30S/0E. This flake was recovered within the sod/grass from the surface of the STP and was essentially a surface artifact concealed by grass. No subsurface artifacts were recovered from the STPs. Because the STPs did not indicate the presence of a subsurface deposit at site CA-SDI-17299, no further subsurface testing was conducted.

### 4.3.2 Artifact Analysis

The projectile point and mano identified during the survey work are described in that section of the report. During the testing phase, a total of nine pieces of debitage were collected. These included eight debitage (See Table 3) recovered from the surface area as well as one debitage piece collected from the surface of an STP.

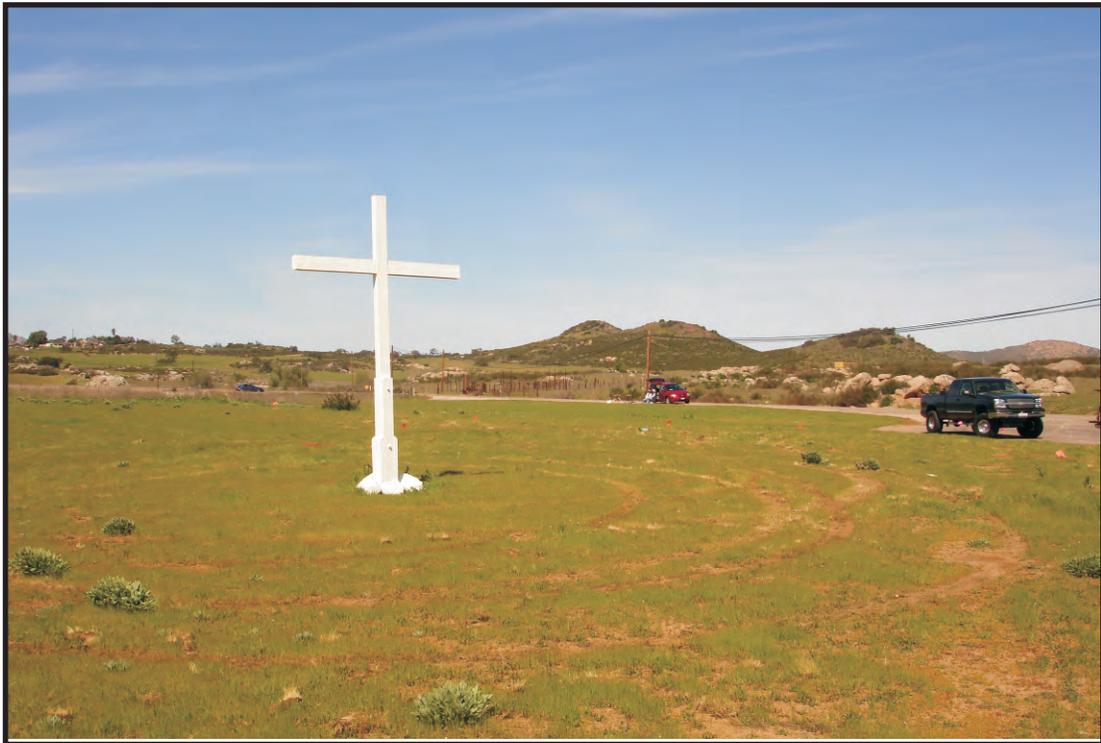
**Figure 6**

**CA-SDI-17299 Testing Map**

**(Confidential figure located in Appendix F)**



CA-SDI-17299 Overview, View to Southeast, PR-02896-002



CA-SDI-17299 Overview, View to Northwest, PR-02896-008

Figure 7  
CA-SDI-17299 Overview Photographs



**Laguna Mountain Environmental, Inc.**

Table 4 provides a summary of the debitage by material and reduction type. The majority of the debitage was made from Santiago Peak Volcanic material. Six of the nine debitage fragments were made from Santiago Peak Volcanic material which would have been available in the Black Mountain area approximately 17 kilometers west of the project area. The remaining three debitage fragments in the assemblage are made from milky quartz that is available from pegmatite dikes in the foothills on the northern margin or the Santa Maria Valley and/or in other areas to the east of the project. The use of materials suggests both a seasonal connection to the west as well as interaction with the local environment and use of local materials.

**Table 4. Debitage Summary**

| Reduction Stage | Material Type          |              | Total        | Percent      |
|-----------------|------------------------|--------------|--------------|--------------|
|                 | Santiago Peak Volcanic | Milky Quartz |              |              |
| Secondary       | 1                      | 0            | 1            | 11.0         |
| Interior        | 5                      | 3            | 8            | 89.0         |
| <b>Total</b>    | <b>6</b>               | <b>3</b>     | <b>9</b>     | <b>100.0</b> |
| <b>Percent</b>  | <b>67.0</b>            | <b>33.0</b>  | <b>100.0</b> |              |

Nearly all the debitage lacked cortex and only one piece of Santiago Peak Volcanic material has a single remnant of rounded cobble surface suggesting a secondary source. All of the debitage reflects core reduction and no pressure or bifacial thinning flakes are present.

### 4.3.3 Summary

The results of testing at CA-SDI-17299 indicate the site is a sparse surface scatter of artifacts that may be associated with brief prehistoric camping activity at the site and/or with other activities associated with bedrock milling outside the project area to the north. The artifact assemblage is dominated by flaked lithic debitage suggesting that lithic tool production was the major activity at the site. The presence of a mano fragment observed during the survey and the arrow point, indicated seed processing and hunting activities are also associated with the site. The absence of a subsurface deposit and the limited artifact assemblage recovered indicate that this site does not retain additional research potential.

## **5.0 INTERPRETATION OF RESOURCE IMPORTANCE AND IMPACT IDENTIFICATION**

### **5.1 Resource Importance**

The goal of the project was to identify resources that may be impacted by the project. The cultural resource survey identified one cultural resource (CA-SDI-17299) within the project area. Remains of the structure of historic age do not remain within the project area. Site CA-SDI-17299 consists of a temporary camp with associated surface artifacts. It is possibly a portion of a larger resource located off the project to the north. CA-SDI-17299 had not been previously evaluated for the California Register of Historical Resources (California Register) eligibility or significance under RPO.

The testing and evaluation program did not identify a subsurface component at site CA-SDI-17299. Surface artifact recovery was very limited. Testing and evaluation has resulted in the recovery of the archaeological material from the site. Under County Guidelines, site CA-SDI-17299 qualifies as important because it retains integrity and has archaeological information potential. Recovery of the surface artifacts from CA-SDI-17299 during testing and the absence of subsurface artifacts, indicates that the information potential from the site has been recovered. CA-SDI-17299 does not retain any additional information potential, due to an absence of additional artifacts and no subsurface deposit. CA-SDI-17299 is not recommended as eligible for nomination to the California Register or the County RPO. Curation of the cultural material from the site will result in the preservation of the material that made the site important under County Guidelines. In addition, grading monitoring consisting of a County approved archaeologist and Native American representative will ensure that buried cultural deposits are not disturbed during grading.

### **5.2 Impact Identification**

Project impacts include construction of a church and associated parking facilities (Figure 8). Site CA-SDI-17299 will be directly impacted by the proposed project parking facilities.

The potential for additional buried resources is present based on alluvial soils and survey results. The presence of site CA-SDI-17299 suggests the potential for further prehistoric material in the area. Impacts to undiscovered buried historic and prehistoric cultural resources could result from grading for construction or parking improvements and/or stormwater improvements.

**Figure 8**

**Proposed Impacts and Associated Cultural Resource**

**(Confidential figure located in Appendix F)**

## **6.0 MANAGEMENT CONSIDERATIONS, MITIGATION MEASURES, AND DESIGN CONSIDERATIONS**

The goal of the project was to identify and evaluate resources that may be impacted by the project. The cultural resource survey resulted in the identification of CA-SDI-17299 within the project area, along with the potential for buried cultural resources. The testing and evaluation program did not identify a subsurface component at site CA-SDI-17299. Surface artifact recovery was very limited. Artifacts and information was recovered from the site during testing. CA-SDI-17299 does not retain any additional information potential, due to an absence of additional artifacts and a subsurface deposit. CA-SDI-17299 is not recommended as eligible for nomination to the California Register or the County RPO.

### **6.1 Mitigable Impacts**

Archaeological site CA-SDI-17299 will be directly impacted by the proposed project. CA-SDI-17299 cannot be avoided and incorporated into an open-space easement. CA-SDI-17299 is not recommended as eligible for nomination to the California Register or the County RPO. Curation of the cultural material from the site will result in the preservation of the material that made the site important under County Guidelines.

The potential is present for buried cultural resources based on the alluvial nature of the area and survey results. Cultural resource monitoring by both an archaeological monitor and a Native American monitor is recommended during construction grading and improvements. The monitoring will ensure that any undiscovered buried archaeological resources are identified. If resources are identified, then data recovery excavation will be required if impacts cannot be avoided.

### **6.2 No Significant Adverse Effects**

With the implementation of the above mitigation measures, no significant adverse effects will result from project impacts.

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## **8.0 LIST OF PREPARERS AND PERSONS AND ORGANIZATIONS CONTACTED**

### **8.1 List of Preparers**

#### **Laguna Mountain Environmental, Inc.**

Andrew R. Pigniolo, RPA, Primary Author

Clinton J. Linton, Secondary Author

### **8.2 List of Persons and Organizations Contacted**

#### **South Coastal Information Center (SCIC)**

Seth Mallios

#### **Museum of Man**

Grace Johnson

#### **County of San Diego Cartographic Department**

#### **Laguna Mountain Environmental, Inc - Archival Maps and Records**

## 9.0 LIST OF MITIGATION MEASURES AND DESIGN CONSIDERATIONS

| <b>Mitigation Measures</b>   | <b>Design Considerations</b> |
|--|------------------------------|
| Implement an archaeological and Native American monitoring program to mitigate potential impacts to undiscovered buried archaeological resources.                            | None                         |
| Curation of the cultural material recovered during the testing program will result in the preservation of the material that made the site important under County Guidelines. | None                         |

## **APPENDICES**

- A. Resume of Principal Investigator
- B. Native American Consultation
- C. Artifact Catalogue
- D. Records Search Confirmations and Site Locations (Confidential)
- E. Site Record (Confidential)
- F. Confidential Figures (Confidential)

**APPENDIX A**

**RESUME OF PRINCIPAL INVESTIGATOR**

**ANDREW R. PIGNIOLO, M.A., RPA**  
**Principal Archaeologist**  
**Laguna Mountain Environmental, Inc.**

**Education**

San Diego State University, Master of Arts, Anthropology, 1992  
San Diego State University, Bachelor of Arts, Anthropology, 1985

**Professional Experience**

|              |   |
|--------------|---|
| 2002-Present | Principal Archaeologist/President, Laguna Mountain Environmental, Inc., San Diego, California                             |
| 1997-2002    | Senior Archaeologist, Tierra Environmental Services, San Diego, California  |
| 1994-1997    | Senior Archaeologist, KEA Environmental, Inc., San Diego, California  |
| 1985-1994    | Project Archaeologist, Ogden Environmental and Energy Services, San Diego, California                                     |
| 1982-1985    | Reports Archivist, Cultural Resource Management Center (now South Coastal Information Center), San Diego State University |
| 1980-1985    | Archaeological Consultant, San Diego, California  |

**Professional Affiliations**

Register of Professional Archaeologists (RPA; formerly called SOPA), 1992-present  
Society for American Archaeology  
Society for California Archaeology  
Pacific Coast Archaeology Society  
Certified Archaeology Consultant, San Diego County  
Certified Archaeology Consultant, Riverside County  
Certified Archaeology Consultant, City of San Diego  
Permitted for Bureau of Land Management lands in California

**Qualifications**

Mr. Andrew Pignuolo is RPA/SOPA certified (1992-present) and is a certified archaeology consultant for San Diego and Riverside Counties. Mr. Pignuolo has more than 29 years of experience as an archaeologist, and has conducted more than 650 projects throughout southern California and western Arizona. His archaeological investigations have been conducted for a wide variety of development and resource management projects including military installations, geothermal power projects, water resource facilities, transportation projects, commercial and residential developments, and projects involving Indian Reservation lands. He has conducted the complete range of technical studies including archaeological overviews, archaeological surveys, test excavations, historical research, evaluations of significance for National Register eligibility, data recovery programs, and monitoring projects.

## **Relevant Projects**

**Rancho San Vicente Project** (*Turrini & Brink Planning Consultants*) Mr. Pigniolo served as Project Archaeologist, Principal Author, and Field Manager of a testing program at 24 archaeological sites located within an 850-acre planned development near Ramona, San Diego County, California. The project was conducted for compliance with County of San Diego guidelines and CEQA.

**Los Coyotes Landfill Cultural Resources** (*Bureau of Indian Affairs*) Project Archaeologist and Field Manager of a cultural resources survey for a landfill and related facilities on Los Coyotes Indian Reservation in San Diego County, California. The project involved a literature search and field survey to identify the presence and location of archaeological sites within the project boundary in compliance with NEPA.

**Salt Creek Ranch Testing Program** (*City of Chula Vista*) Mr. Pigniolo served as Project Archaeologist, Principal Author, and Field Manager of a large testing program which included 27 archaeological sites that were evaluated under CEQA and City of Chula Vista guidelines.

**State Route 56 Transportation Alternatives Project** (*City of San Diego*) Mr. Pigniolo was Senior Archaeologist, Principal Author, and Field Manager for a large testing and evaluation program at 13 sites in northern San Diego. Six of these were significant pursuant to CEQA and NHPA criteria providing a variety of important data on the Archaic period.

**Imperial Project 2,500-Acre Survey and Evaluation** (*Bureau of Land Management*) Mr. Pigniolo served as the Senior Archaeologist, Author, and Field Manager for an intensive archaeological inventory of more than 2,500 acres in eastern Imperial County, California for a proposed gold mine project. The project included the involvement of Native American representatives. More than 90 sites, including eight very large multicomponent sites, were identified and evaluated for National Register eligibility. A Traditional Cultural Property was identified and evaluated in the main portion of the project area.

**Daley Rock Quarry Cultural Resources Survey and Test** (*The Daley Corporation*) Project Archaeologist, Author, and Field Manager for the testing program and a series of associated surveys for a large prehistoric quarry (CA-SDi-10,027) located in southern San Diego County in compliance with County of San Diego guidelines and CEQA.

**MCAS Tustin Relocation, MCAGCC Twentynine Palms 5,000-Acre Survey Project** (*Commandant of the Marine Corps, COMCABWEST Base Realignment and Closure*) Mr. Pigniolo was Principal Investigator, Author, and Field Manager of a proposed base relocation project in San Bernardino County, California. The project included intensive inventory of an approximately 5,000 acre area and the recording of 137 archaeological sites and 207 isolated artifacts. The project was conducted under Section 106 of the national Historic Preservation Act (NHPA).

**Reconnaissance of Sky Oaks Ranch** (*Systems Ecology/Biology, San Diego State University*) Mr. Pigniolo participated in archaeological survey of more than 1,500 acres in the eastern portion of San Diego County.

**Olympic Training Center Boathouse Project** (*City of Chula Vista*) Project Archaeologist for an archaeological survey and testing program at two prehistoric archaeological sites adjacent to Lower Otay Lake.

**Otay Ranch 5,000-Acre Survey Project** (*City of Chula Vista*) Mr. Pigniolo served as Project Archaeologist for a survey of approximately 5,000 acres in southern San Diego County in compliance with County of San Diego guidelines, CEQA, and guidelines of the City of Chula Vista.

**Scripps Poway Parkway Alternatives Project** (*City of Poway*) Mr. Pigniolo was Principal Investigator, Author, and Field Manager of a survey of approximately 1,400 acres in the City of Poway. The survey resulted in the identification of 69 archaeological and historical resources within the area of potential effect. The survey was conducted under guidelines for the California Environmental Quality Act (CEQA) and the National Historic Preservation Act (NHPA).

**160-Acre Eastlake Parcel of Otay Ranch** (*City of Chula Vista/County of San Diego*) Project Archaeologist for an archaeological survey identifying three sites and ten isolates.

**Monofill Land Exchange Project** (*Magma Operating Company*) Mr. Pigniolo was Principal Investigator and Project Manager of an archaeological field survey of 1,280 acres to create a buffer zone around an existing landfill operation. The survey identified 92 prehistoric and historic sites and 42 isolated artifacts. The project was conducted in compliance with NEPA.

**Otay Mesa OHV Park Survey** (*County of San Diego*) Associate Archaeologist and Field Manager of a survey of the eastern portion of Otay Mesa in southern San Diego County pursuant to CEQA and County of San Diego guidelines.

**Viejas Indian Reservation 1,200-Acre Survey** (*Gold River Country*) Project Archaeologist for an archaeological survey of the entire Viejas Indian Reservation identifying more than 60 archaeological sites.

**Campo Indian Reservation Cultural Resource Inventory** (*U.S. Department of the Interior National Park Service*) Mr. Pigniolo participated in an archaeological survey of approximately 12,000 acres. The survey included working closely with local Native Americans in the identification and recordation of a variety of prehistoric and historic cultural resources.

**APPENDIX B**

**NATIVE AMERICAN CONSULTATION**



# County of San Diego

**ERIC GIBSON**  
DIRECTOR

## DEPARTMENT OF PLANNING AND LAND USE

5201 RUFFIN ROAD, SUITE B, SAN DIEGO, CALIFORNIA 92123-1666  
INFORMATION (858) 694-2960  
TOLL FREE (800) 411-0017

April 15, 2010

**TO:**

Barona Group of the Capitan Grande  
Edwin "Thorpe" Romero, Chairman  
Campo Kumeyaay Nation  
Ms. Monique LaChappa, Chairwoman  
Inaja Band of Mission Indians  
Ms. Rebecca Osuna, Chairperson  
Jamul Indian Village  
Mr. Kenneth Meza, Chairman  
Kwaaymii Band of Mission Indians  
Ms. Carmen Lucas  
La Posta Band of Mission Indians  
Ms. Gwendolyn Parada, Chairperson  
Manzanita Band of the Kumeyaay Nation  
Mr. Leroy J. Elliott, Chairman  
Mesa Grande Band of Mission Indians  
Mr. Mark Romero, Chairman  
San Pasqual Band of Mission Indians  
Mr. Allen E. Lawson Jr., Chairman  
Santa Ysabel Band of Diegueno Indians  
Mr. Johnny Hernandez, Spokesman  
Sycuan Band of the Kumeyaay Nation  
Mr. Daniel Tucker, Chairman  
Viejas Band of Kumeyaay Indians  
Mr. Bobby L. Barrett, Chairman  
Ms. Lisa Haws, Special Projects Manager  
Ewiaapaayp Tribal Office  
Mr. Robert Pinto, Chairman

RE: SACRED LANDS CHECK; Lutheran Church/Spirit of Joy; MUP 08-017;  
San Pasqual- Valle De Pamo or Santa Maria Landgrant;

The County of San Diego (County) requests your participation in the review process of the Lutheran Church/Spirit of Joy MUP 08-017. The project is a Major Use Permit for a Religious Complex (Zoning Ordinance Use Type Classification: Major Impact Services & Utilities). The project consists of construction of a 5,745 square-foot sanctuary, 5,500 square-foot fellowship hall, two 3,700 square-foot administrative/classroom buildings, 250 square-foot maintenance/utility building, 182 parking spaces, and associated

April 15, 2010

landscaping. It is located at APN# 283-054-11, 283-054-03, 283-054-07, and 283-054-08 in the community planning area of Ramona and is subject to the California Environmental Quality Act (CEQA), and the County of San Diego Resource Protection Ordinance (RPO). Staff contacted the Native American Heritage Commission (NAHC) who has requested that we contact you directly regarding the potential for the presence of Native American cultural resources that may be impacted by this project. The project is currently in the process of environmental review.

Any information you have regarding cultural places will be kept strictly confidential and will not be divulged to the public. Although we are providing to you for the purposes of your review this confidential information regarding the location of cultural places, this information is not available to the public.

The County of San Diego feels that your comments regarding decisions that may affect ancestral tribal sites are very important. Please forward any comments regarding this project to Diane Buell by May 15, 2010.

If you have any questions, you can reach me at (858) 694-3721; further contact information can be found below.

Sincerely,

*Diane Buell*

Diane Buell  
Staff Archaeologist

Department of Planning and Land Use  
5201 Ruffin Road, Suite B, MS 0650  
San Diego, CA 92123-1666  
(858) 694-3721  
(858) 694-3373 fax  
<mailto:diane.buell@sdcounty.ca.gov>

Attachment  
USGS San Pasqual Map

cc: Spirit of Joy Lutheran Church, 1735 Main St, Ramona, CA 92065  
Greg Danskin, 1543 Robyn Road, Escondido, CA 92025  
Teresa Brownyard, Tribal Liaison, Chief Administrative Office, M.S. 029

Email cc: Amber Griffith, Project Manager, DPLU

# LOCAL GOVERNMENT TRIBAL CONSULTATION LIST REQUEST

## NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364

SACRAMENTO, CA 95814

(916) 653-4082

(916) 657-5390 - Fax

April 7, 2010

**Project Title:** Spirit of Joy Lutheran Church; Log No; APN# 283-054-11, 283-054-03, 283-054-07, and 283-054-08

**Local Government/Lead Agency:** County of San Diego

**Contact Person:** Diane Shalom

**Street Address:** 5201 Ruffin Road, Suite B

**City:** San Diego

**Zip Code:** 92123-1666

**Phone Number:** (858) 694-3721

**Fax Number:** (858) 694-3373

### Specific Area Subject to Proposed Action:

**County:** San Diego

**City/Community:** Ramona

### Local Action Type:

General Plan                       General Plan Element                       General Plan Amendment

Specific Plan                       Specific Plan Amendment

Pre-Planning Outreach Activity

**Project Description:** The project is a Major Use Permit for a Religious Complex (Zoning Ordinance Use Type Classification: Major Impact Services & Utilities). The project consists of construction of a 5,745 square-foot sanctuary, 5,500 square-foot fellowship hall, two 3,700 square-foot administrative/classroom buildings, 250 square-foot maintenance/utility building, 182 parking spaces, and associated landscaping.

**Sacred Lands File Search and Native American Contacts List Request**  
Information Below is Required for a Sacred Lands File Search

**USGS Quadrangle Name:** San Pasqual- Valle De Pamo or Santa Maria Landgrant

**Township:** \_\_\_\_\_ **Range:** \_\_\_\_\_ **Section(s):** \_\_\_\_\_

STATE OF CALIFORNIA

Arnold Schwarzenegger, Governor

**NATIVE AMERICAN HERITAGE COMMISSION**

915 CAPITOL MALL, ROOM 354  
SACRAMENTO, CA 95814  
(916) 653-6251  
Fax (916) 657-5390  
Web Site [www.nahc.ca.gov](http://www.nahc.ca.gov)  
e-mail: [da\\_nahc@pacbell.net](mailto:da_nahc@pacbell.net)



April 14, 2010

Ms. Diane Shalom

**COUNTY OF SAN DIEGO**

5201 Ruffin Road, Suite B  
San Diego, CA 92123-1666

Sent by FAX to: 858-694-3373

No. Pages: 3

Re: Tribal Consultation Per SB 18 (California Government Code §§ 65352.3, 65352.4, 65562 and 65560, for Pre-planning Consultation for Spirit of Joy Luthern Church (054-03, 283-054-97, and 283-054-08) Project, located in the Ramona Area of San Diego County, California

Dear Ms. Shalom:

Government Code §65352.3 requires local governments to consult with California Native American tribes identified by the Native American Heritage Commission (NAHC) for the purpose of protecting, and/or mitigating impacts to cultural places. Attached is a Native American Tribal Consultation list of tribes with traditional lands or cultural places located within the requested plan boundaries. A tribe may be the only source of information regarding the existence of a cultural place. We suggest you consult with all of those on the accompanying Native American Contacts list, which is attached. If they cannot supply information, they might recommend others with specific knowledge about cultural resources in your plan area. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call in about two weeks to ensure that the project information has been received.

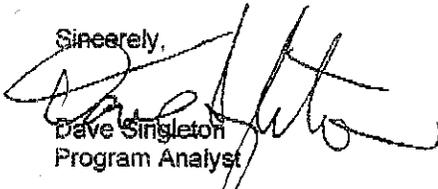
The NAHC did a Sacred Lands File search of the 'area of potential effect' (APE); and Native American cultural resources were identified. Additional information about the resources may be available from the Native American contacts attached.

Furthermore, we recommend that the South Coastal Information Center be contacted (San Diego State University (619) 594-4483 to determine if there are any recorded sites in the California Historical Resources Information System that might be affected by the proposed project.

If you receive notification of change of addresses and phone numbers from Tribes, please notify me. With your assistance we are able to assure that our consultation list contains current information.

If you have any questions, please contact me at (916) 653-6251.

Sincerely,



Dave Singleton  
Program Analyst

Attachment: Native American Tribal Consultation List (SB 18)

**Native American Tribal Consultation List**  
**San Diego County**  
**April 14, 2010**

|   |                          |  |                            |
|---|--------------------------|--|----------------------------|
| <p>Barona Group of the Capitan Grande<br/>           Edwin Romero, Chairperson<br/>           1095 Barona Road<br/>           Lakeside , CA 92040<br/>           sue@barona-nsn.gov<br/>           (619) 443-6612</p>         | <p>Diegueno</p>          | <p>Sycuan Band of the Kumeyaay Nation<br/>           Danny Tucker, Chairperson<br/>           5459 Sycuan Road<br/>           El Cajon , CA 92021<br/>           ssilva@sycuan-nsn.gov<br/>           619 445-2613</p>   | <p>Diegueno/Kumeyaay</p>   |
| <p>Ewilaapaayp Tribal Office<br/>           Robert Pinto, Chairperson<br/>           4054 Willows Road<br/>           Alpine , CA 91901<br/>           wmiclin@leaningrock.net<br/>           (619) 445-6315 - voice</p>      | <p>Diegueno/Kumeyaay</p> | <p>Viejas Band of Mission Indians<br/>           Bobby L. Barrett, Chairperson<br/>           PO Box 908<br/>           Alpine , CA 91903<br/>           jrothauff@viejas-nsn.gov<br/>           (619) 445-3810</p>      | <p>Diegueno/Kumeyaay</p>   |
| <p>La Posta Band of Mission Indians<br/>           Gwendolyn Parada, Chairperson<br/>           PO Box 1120<br/>           Boulevard , CA 91905<br/>           (619) 478-2113</p>   | <p>Diegueno/Kumeyaay</p> | <p>Jamul Indian Village<br/>           Kenneth Meza, Chairperson<br/>           P.O. Box 612<br/>           Jamul , CA 91935<br/>           jamulrez@sctdv.net<br/>           (619) 669-4785</p>                         | <p>Diegueno/Kumeyaay</p>   |
| <p>San Pasqual Band of Mission Indians<br/>           Allen E. Lawson, Chairperson<br/>           PO Box 365<br/>           Valley Center , CA 92082<br/>           (760) 749-3200</p>  | <p>Diegueno</p>          | <p>Mesa Grande Band of Mission Indians<br/>           Mark Romero, Chairperson<br/>           P.O Box 270<br/>           Santa Ysabel , CA 92070<br/>           mesagrandeband@msn.com<br/>           (760) 782-3818</p> | <p>Diegueno</p>            |
| <p>Santa Ysabel Band of Diegueno Indians<br/>           Johnny Hernandez, Spokesman<br/>           PO Box 130<br/>           Santa Ysabel , CA 92070<br/>           brandietaylor@yahoo.com<br/>           (760) 765-0845</p> | <p>Diegueno</p>          | <p>Kwaaymii Laguna Band of Mission Indians<br/>           Carmen Lucas<br/>           P.O. Box 775<br/>           Pine Valley , CA 91962<br/>           (619) 709-4207</p>   | <p>Diegueno - Kwaaymii</p> |

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable only for consultation with Native American tribes under Government Code Section 65352.3.

**Native American Tribal Consultation List**  
**San Diego County**  
**April 14, 2010**

**Inaja Band of Mission Indians**  
Rebecca Osuna, Spokesperson  
2005 S. Escondido Blvd. Diegueno  
Escondido , CA 92025  
(760) 737-7628

**Campo Kumeyaay Nation**  
Monique LaChappa, Chairwoman  
36190 Church Road  
Campo , CA 91906  
(619) 478-9046 Diegueno/Kumeyaay

**Manzanita Band of the Kumeyaay Nation**  
Leroy J. Elliott, Chairperson  
P.O. Box 1302  
Boulevard , CA 91905 Diegueno/Kumeyaay  
(619) 766-4930

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 7060.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable only for consultation with Native American tribes under Government Code Section 65352.3.

**APPENDIX C**  
**ARTIFACT CATALOGUE**

CA-SDI-17299 CATALOGUE

| Site         | Cat# | Provenience | Level   | Feature | Class       | Item/Order    | Type/Size      | Subtype/Age | Condition/Butcher Type | Burned/Patinated/Burn Type | Modification/Function/Fusion | Material/Species | Size/Shape/Element | Length(cm)/Shape Function/Portion | Width(cm)/Finish/Fragmentation | Thickness(cm)/Lip/Seasonality | Count | Weight (g) (>1.0=0.05) | Comments/ Maker                                   | Reference and Date | Location and Date | Curated/Repatriated When and Where? |
|--------------|------|-------------|---------|---------|-------------|---------------|----------------|-------------|------------------------|----------------------------|------------------------------|------------------|--------------------|-----------------------------------|--------------------------------|-------------------------------|-------|------------------------|---|--------------------|-------------------|-------------------------------------|
| CA-SDI-17299 | 1    | Surface #1  | Surface | -       | Debitage    | Flake         | Core Reduction | none        | Interior               | Patinated                  | Aphanitic                    | SPV              | 14-25 mm           | -                                 | -                              | -                             | 1     | 2.0                    | -   | Bietz (3/22/10)    | Office (3/22/10)  | -                                   |
| CA-SDI-17299 | 2    | Surface #2  | Surface | -       | Debitage    | Flake         | Core Reduction | none        | Interior               | Unpatinated                | Porphyritic, Fine-Grained    | SPV              | 8-13 mm            | -                                 | -                              | -                             | 1     | 0.1                    | -   | Bietz (3/22/10)    | Office (3/22/10)  | -                                   |
| CA-SDI-17299 | 3    | Surface #3  | Surface | -       | Debitage    | Flake         | Core Reduction | none        | Interior               | Unpatinated                | Aphanitic                    | SPV              | 14-25 mm           | -                                 | -                              | -                             | 1     | 1.0                    | -   | Bietz (3/22/10)    | Office (3/22/10)  | -                                   |
| CA-SDI-17299 | 4    | Surface #4  | Surface | -       | Debitage    | Flake         | Core Reduction | none        | Interior               | Unpatinated                | Aphanitic                    | MQ               | >25 mm             | -                                 | -                              | -                             | 2     | 3.4                    | Two fragments of 1 larger broken piece ofdebitage | Bietz (3/22/10)    | Office (3/22/10)  | -                                   |
| CA-SDI-17299 | 5    | Surface #5  | Surface | -       | Debitage    | Angular Waste | Core Reduction | none        | Interior               | Unpatinated                | Aphanitic                    | MQ               | 8-13 mm            | -                                 | -                              | -                             | 1     | 0.3                    | -   | Bietz (3/22/10)    | Office (3/22/10)  | -                                   |
| CA-SDI-17299 | 6    | Surface #6  | Surface | -       | Debitage    | Angular Waste | Core Reduction | none        | Interior               | Patinated                  | Aphanitic                    | SPV              | >25 mm             | -                                 | -                              | -                             | 1     | 4.4                    | -   | Bietz (3/22/10)    | Office (3/22/10)  | -                                   |
| CA-SDI-17299 | 7    | Surface #7  | Surface | -       | Debitage    | Angular Waste | Core Reduction | Rounded     | Secondary              | Patinated                  | Aphanitic                    | SPV              | 14-25 mm           | -                                 | -                              | -                             | 1     | 0.4                    | -   | Bietz (3/22/10)    | Office (3/22/10)  | -                                   |
| CA-SDI-17299 | 8    | STP 30S/0E  | 0-10 cm | -       | Debitage    | Flake         | Core Reduction | none        | Interior               | Patinated                  | Aphanitic                    | SPV              | 14-25 mm           | -                                 | -                              | -                             | 1     | 0.9                    | -   | Bietz (3/22/10)    | Office (3/22/10)  | -                                   |
| CA-SDI-17299 | 9    | -           | -       | -       | Soil Sample | -             | -              | -           | -                      | -                          | -                            | -                | -                  | -                                 | -                              | -                             | -     | 110.2                  | -   | Bietz (3/22/10)    | Office (3/22/10)  | -                                   |

**APPENDIX D**  
**RECORDS SEARCH CONFIRMATIONS**  
**AND**  
**SITE LOCATIONS**  
**(with Confidential Figures)**

**APPENDIX E**  
**SITE RECORD UPDATE**  
**(with Confidential Appendices)**

**APPENDIX F**  
**CONFIDENTIAL FIGURES**  
**(with Confidential Appendices)**