

CULTURAL RESOURCES SURVEY REPORT – POSITIVE FINDINGS

**Vista II Residential Project
PDS2022-TM-5647/PDS2022-MUP-22-011**

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TM5647**

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Report Date: September 2024

Report Title: Cultural Resources Survey Report – Positive Findings for the Vista II Residential Project

Project Number: PDS2022-TM-5647/PDS2022-MUP-22-011

Type of Study: Intensive Pedestrian/Phase I

New Sites: P-37-039630 (Isolate)

Updated Sites: None

USGS Quad: San Marcos

Acreage: 5.41 acres

Key Words: Prehistoric, Potential Mano, Granitic

Acronyms

CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CHRIS	California Historic Resources Inventory System
CRHR	California Register of Historical Resources
DPR	Department of Parks & Recreation
m	Meter
MLD	Most Likely Descendant
NAHC	Native American Heritage Commission
NRHP	National Register of Historical Places
PRC	Public Resources Code
RPO	Resource Protection Ordinance
USGS	United States Geological Survey

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EXECUTIVE SUMMARY

The Vista II Residential Project (project) is a subdivision of 5.33 acres in northern San Diego County, adjacent to the City of Vista. The project is north of Hannalei Drive, west of South Santa Fe Avenue and the North County Transit District SPRINTER railroad tracks, east of the existing Stonebrooke Church, and south of undeveloped land. The project is at 145 Hannalei Drive in Section 32 of Township 11S, Range 03W, on the San Marcos U.S. Geological Survey quadrangle.

When fully developed, the project will be developed with 37 dwelling units. The units would be three- or four-bedroom, two-story, and detached. The project would include parking, common open space, and landscaping. Primary access would be off Hannalei Drive with a secondary emergency only access in the northwestern area of the site connecting to an adjacent church property to the west. Project grading includes 10,700 cubic yards of cut, 21,100 cubic yards of fill, and 10,400 cubic yards of import.

The cultural resources study consisted of a cultural resources survey of the project area, as well as documentation and evaluation of identified resources. Harris archaeologists coordinated with Native American monitors from Saving Sacred Sites (Luiseño).

One archaeological isolate (P-37-039630) was identified. The isolate, a potential mano, was documented in the field, recorded on Department of Parks & Recreation (DPR) forms, and left in place. The isolate was determined not to be a significant resource under the California Environmental Quality Act (CEQA) or the County of San Diego Resource Protection Ordinance (RPO). The research potential of this isolate has been fulfilled through documentation. No mitigation measures are required for this isolate which will be subject to direct impacts.

The project is in an area with archaeological and cultural sensitivity. Therefore, a monitoring program must be implemented for any grading or other ground-disturbing activities as detailed in this report.

No concerns were raised by the Native American monitor (Natane Mojado) during the survey.

1.0 INTRODUCTION

1.1 Project Description

The Vista II Residential Project (project) is a single-family development on 5.33 acres within northern San Diego County. The Project is adjacent to the City of Vista (Figure 1, Regional Location). The property is suburban with close access to highways, employment, services, and amenities.

The project is north of Hannalei Drive, west of South Santa Fe Avenue and the North County Transit District SPRINTER railroad tracks, east of the existing Stonebrooke Church, and south of undeveloped land. The existing parcel includes three existing baseball fields (to be removed), Stonebrooke Church (to be retained), a single-family residence (to be retained), and a drainage (Figure 2, Project Location). Primary access would be off Hannalei Drive with a secondary access in the northwestern area of the site connecting to the adjacent church property to the west. The project also includes a paved parking facility on the adjacent church property. Surrounding land uses include residential, civic, and undeveloped lands. The project site has an elevation ranging from 480 to 520 feet above mean sea level and is within the San Marcos U.S. Geological Survey Quadrangle, Section 32 of Township 11S, Range 03W.

The project is a Tentative Map and Major Use Permit to subdivide an 8.93-acre site into three lots. Lot 1 would contain an existing church and driveway that would be improved as a secondary access for Lot 2. Lot 2, which would be 5.33 acres, would be improved with 37 multi-family condominium units with associated parking and 14,800 square feet of private usable open space. The third lot, Lot A, which has not been approved for future development, would consist of an existing cellular facility. Access to the project site would be from Hannalei Drive, with secondary emergency access in the northwestern area of the site connecting to the adjacent church property to the west (on Lot 1). The project would be part of the North County Metro Community Planning Area. The Vista Fire Protection District would provide fire service, the Buena Sanitation District would provide sewer service, and the Vista Irrigation District would provide water to the project site. The site is subject to General Plan Designation VR-7.3. Zoning for the site is RS. In total, the project would include 111 parking spaces and 61,462 square feet of open space. Earthwork would consist of 10,700 cubic yards of cut, 22,500 cubic yards of fill, and 11,800 cubic yards of imported material. Currently, the project site contains a stockpile of approximately 3,500 cubic yards of soil spread over a 1-acre area, which violates the County's Grading Ordinance. The stockpile would remain on site and be considered part of the project. Final mapping for the project would occur in phases. The first unit would create Lots 1 and 2 and Lot A for finance and conveyance purposes only, not for development. Once the first unit is recorded, Lot 2 would be transferred to the future developer. Lot 2 would then be developed per the conditions of approval for Tentative Tract Map 5647.

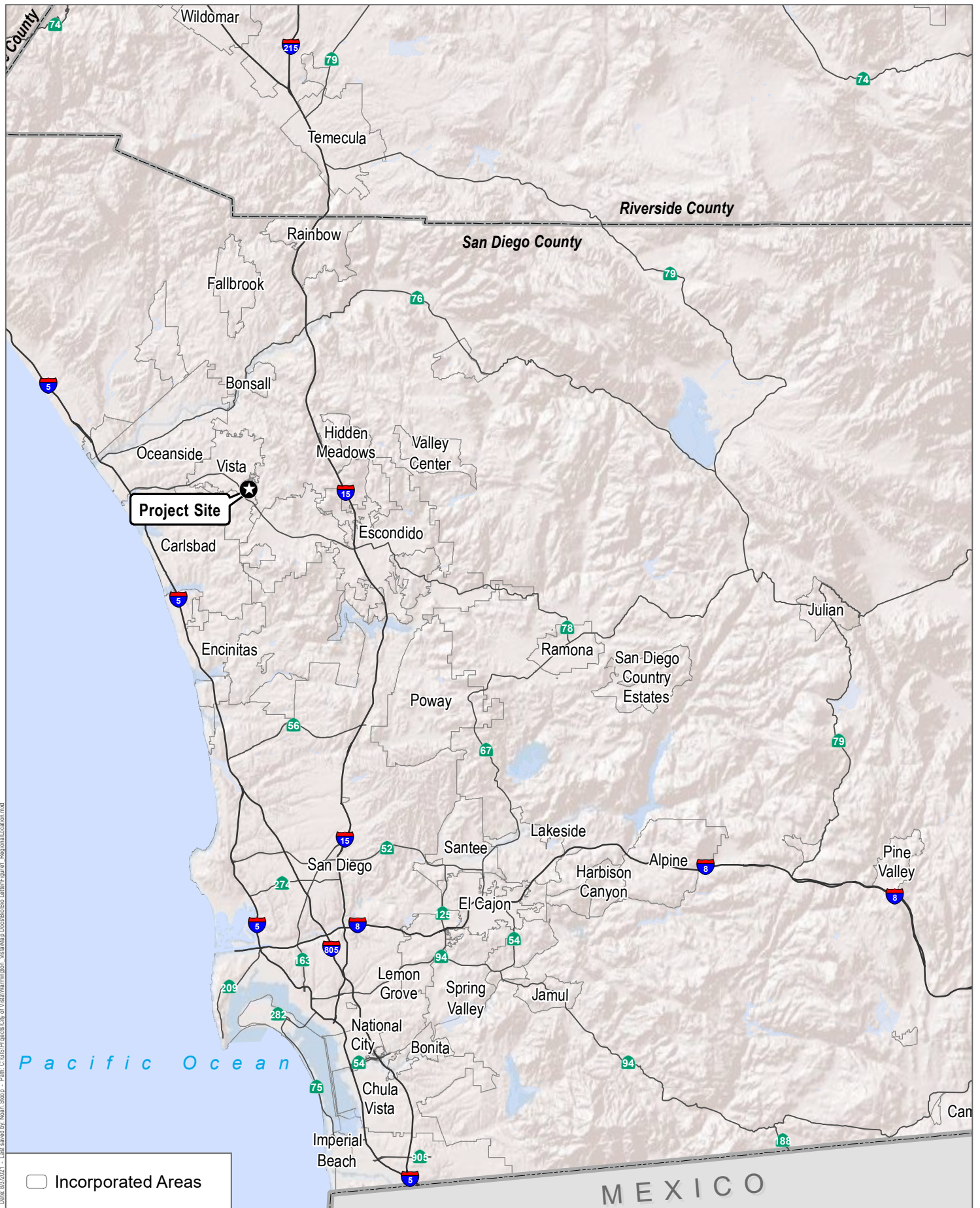
The cultural resources study consists of a field survey of the project area and evaluation of resources, as well as documentation and recordation. Harris, Senior Archaeologist, Donna Beddow, served as the Principal Investigator. Natane Mojado of Saving Sacred Sites served as the Luiseño Native American monitor during the survey.

1.2 Existing Conditions

1.2.1 Environmental Setting

Natural Environment

The project is in the northern valley ecological subregion and within the coastal climate zone. The area is characterized as “Mediterranean hot summer” (Griner and Pryde 1976) with average summer high temperatures ranging from high 70s to low 80s (June through September), and average winter low temperatures in the high 40s (December, January, February) (weather-us.com 2022). The majority of the project site is developed and includes three existing baseball fields, Stonebrooke Church, a single-family residence, and a drainage. Native vegetation is present within the onsite drainage and within the undeveloped area (north central) of the project site. The project site has an elevation ranging from 480 to 520 feet above mean sea level. The surrounding area is primarily single-family residential with some civic and commercial development. A small amount of undeveloped lands are located north of the project site.



Source: ESRI 2021.



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Figure 1

Regional Location
Vista II Residential Project



Source: SanGIS Imagery 2017.



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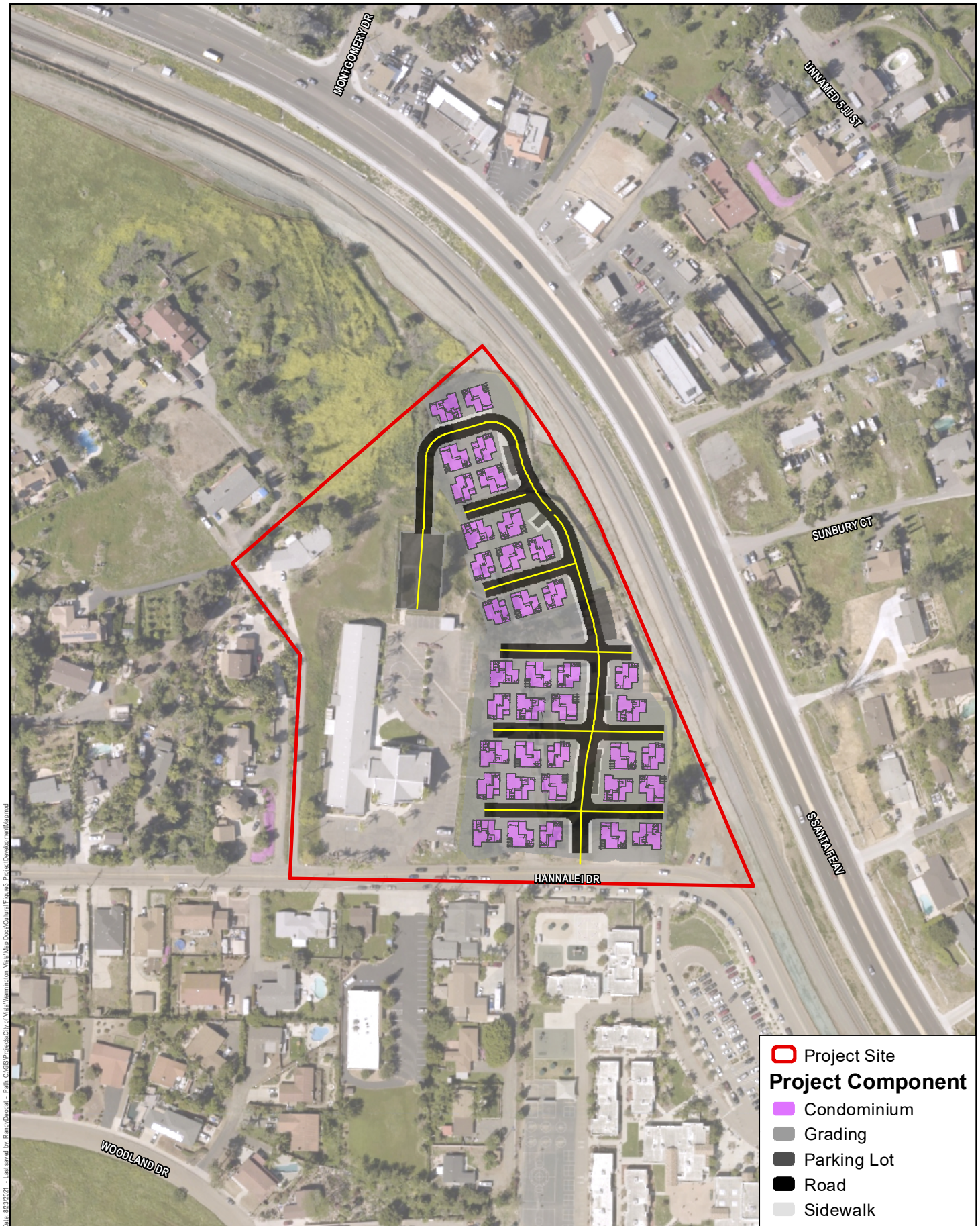


0 100 200
Feet

Figure 2

Project Location

Vista II Residential Project



Date: 8/3/2021 - Last saved by: Randi Doudal - Path: C:\GIS\Projects\City of Vista\Wilmington_Vista Map Doc\Map\Project Development Map.mxd



Harris & Associates



0 100 200
Feet

Figure 3

Project Development

Vista II Residential Project

Cultural Environment

Prehistoric

Cultural resources are found throughout San Diego County and are reminders of the county's 10,000-year-old historical record. Cultural resources are the tangible or intangible remains or traces left by prehistoric or historical people who inhabited the San Diego region. They encompass both the built (post-1769) and the archaeological environments, as well as Traditional Cultural Properties. They are typically in protected areas near water sources and multiple ecoregions and can include Traditional Cultural Places, such as gathering areas, landmarks, and ethnographic locations.

The following provides a brief cultural background for San Diego County.

Paleoindian Period (pre-5500 BC)

Several terms are used for the early occupation of the San Diego region and include Paleoindian period, Early Archaic period, Initial period, and Scraper Maker period (Moratto 1984). This period dates from 9000 to 5500 BC (Chartkoff and Chartkoff 1984; Moratto 1984; Rogers 1966; Taylor and Meighan 1978; Warren and True 1961). Early humans have been characterized as an early nomadic, hunting culture whose settlements were located on mesas and ridge tops and in deserts (Erlandson and Colton 1991; Rogers 1966; Wallace 1978; Warren et al. 1961). During this period, inhabitants relied on large game for subsistence (Rogers 1966; Warren et al. 1961) and produced “finely worked blades, spear points, choppers, and scrapers out of fine-grained volcanics” (Carrico 1977). In addition, leaf-shaped knives, foliate to ovoid bifaces, foliate to short-bladed shoulder points, crescents, engraving tools, core hammers, pebble hammers, and cores were part of the tool assemblage (Moratto 1984; Wahoff and Dolan 2000). Pottery and milling stones were missing from the assemblage, confirming the assumption that hunting was an economic focus for the culture (Moriarty 1967; Warren and True 1961). Because the tool assemblage was similar to desert cultures of the Mojave Desert, it is believed that this culture migrated west from the desert into California (Gallegos 1995; Rogers 1939). However, no single hypothesis is universally accepted. Other hypotheses identify the movement of people into California from the south and north down the coast (Taylor and Meighan 1978; Chartkoff and Chartkoff 1984).

Archaic Period (8000 BC–AD 500)

According to Hale et al. (2018), “the more than 1500-year overlap between the presumed age of Paleoindian occupations and the Archaic period highlights the difficulty in defining a cultural chronology in the San Diego region.” The Archaic period is also known as La Jollan, Millingstone Horizon, and Encinitas Tradition. This period is characterized by the presence of dart points, milling equipment, scattered hearths, shell middens, and flexed burials (Carrico 1977). Subsistence strategies placed an emphasis on gathering, possibly as a result of environmental change (Wahoff and Dolan 2000; Wallace 1978). The assemblage was composed of milling implements and cobble/core-based tools. The flaked tools do not appear to be as refined as those of the Paleoindian period. Mortuary goods included shell beads and ornaments, projectile points, and milling implements. Wallace (1978) interpreted archaeological sites of this period as an indication of an increase in population and permanence. Site types included coastal shell habitation bases, quarries, resource exploitation, and milling (Gallegos 1995). The sites are typified by an abundance of shellfish remains and are situated near sloughs and lagoons and on the open coast (Carrico 1977; Masters and Gallegos 1997; Moratto 1984; Wallace 1978). An inland manifestation

identified as the Pauma complex is known to have existed (True 1958). Unlike the coastal people, this complex occupied “transverse valleys and sheltered canyons of inland San Diego county, ha[d] an emphasis on hunting and gathering, had a greater diversity of tool types, and lacked shellfish remains” (Masters and Gallegos 1997:12).

Similar to the Paleoindian period, controversy surrounds the origins of the Archaic culture. Several hypotheses have been postulated. Kaldenberg (1976) and Moriarty (1967) proposed that the transition from the Paleoindian to the Archaic culture was an *in situ* adaption. In contrast, Warren (1961) viewed this transition as a migration from the desert to the coast due to the adverse environmental condition of the Altithermal. Taylor and Meighan (1978:36) did not take a single position regarding the transition to the Archaic culture but, rather, incorporated all of the hypotheses as identified below:

The artifact inventory and cultural activities argue strongly that this stage began in the desert inland and spread toward the Pacific Coast, reaching it about 8500 years ago. There is no evidence to show whether the Milling Stone Stage involved movement of the people or a conquest of earlier residents; perhaps the early hunters simply adopted this way of life as game animals became scarce.

The population of this period focused on lagoonal resources and moved up and down the river valleys exploiting a variety of inland and coastal resources (Masters and Gallegos 1997).

Late Prehistoric (AD 500-1769)

The Late Prehistoric period is an antecedent to Spanish contact (AD 1000–1769). It was a “time of cultural transformations brought about by trait diffusion, immigration, and *in-situ* adaptation to environmental changes” (Moratto 1984:153). Subsistence strategies involved a focus on terrestrial collection and hunting (Christenson 1992); however, shellfish and other maritime resources were also used. Settlement included large villages near permanent water sources, temporary campsites, quarries, and resource exploitation sites. Small triangular points, pottery, and Obsidian Butte obsidian are characteristic of this period (Christenson 1992; Masters and Gallegos 1997; True 1966, 1970). Cremations replaced flexed inhumations, and mortuary goods became more elaborate (Wallace 1955). Cremations are believed to have been introduced into the area during the Late Prehistoric period and are the result of Shoshonean intrusion (1500 BP) from the deserts (True 1966) into northern San Diego County. However, in the southern part of the County, this practice has been attributed to a “Colorado River origin that may have had an influence as far reaching as the Hohokam [current day Pima people and Tohono O’odham Nation] in southwestern Arizona” (True 1970:58). Kaldenberg (1976:67) had a different opinion on the origin and timing of the entrance of cremation practices into the region. He noted that the practice of cremation was introduced at the terminus of the Archaic culture (3000 BP) with the “migration of Yuman people into the San Diego coastal region.” By 2000 BP, inhumations were replaced by cremations (Kaldenberg 1976).

Two complexes (San Luis Rey and Cuyamaca) are identified with the Late Prehistoric period. True (1966) believed that the San Luis Rey complex was a precursor to the ethnographic Luiseño. Similarly, he suggested that the Cuyamaca complex was the predecessor to the ethnographic Kumeyaay. Through the examination of both geographic regions, True identified specific

characteristics unique to each; however, he noted that, although geographically similar, these two cultures were distinctly different.

Ethnohistoric Period (post-AD 1769)

The Ethnohistoric period begins with the first permanent European settlements. Early Ethnohistoric accounts and mission documents have been used to reconstruct this period (Hale et al. 2018). Florence Shippek (1993) delineated the boundaries between the Luiseño and the Kumeyaay as follows:

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

The Kumeyaay (also known as Ipai, Tipai, Diegueño, and Kamia) lived in small villages, or rancherias, and would inhabit multiple locations throughout the year. According to Cline (1984), the typical settlement included two or more seasonal villages with temporary camps farther away from the main central villages. Hunting and gathering were the main economic focus, consisting of small game, acorns, grass seeds, and other plant resources. Similar to the Prehistoric period, a wide range of tools (chipped and ground stone) that were made from locally available materials were used. Exotic materials, such as obsidian and chert, were imported from the deserts to the north and east. In addition to lithic tools, the Kumeyaay produced baskets and pottery.

Historical Period (post-AD 1542)

The Historical period can be divided into three phases (Spanish, Mexican, and American). Each phase is identified with a change in political power. Common goals in each phase included land gain, assimilation of the native population, and the attainment of wealth. However, these periods were dissimilar in the rationale behind these goals. Rationale included defense (Spain), independence and secularization (Mexico), and expansion and economics (United States). Assimilation of Native Californians was a desire of each government that came to power; however, the greatest misfortune of this period was the large decline in Native American populations (Phillips 1981).

Spanish Period (AD 1769–1821)

Although the first Spanish contact occurred in 1542, it was not until 1769 that the first permanent settlement was established. The Spanish period was a time of European expansionism and is typically identified with the mission system. In addition, presidios (military defense) and pueblos (city government) played an important role in the structuring of the community (Campbell 1977). The mission system was the institution designated for the assimilation and exploitation of native people (Campbell 1977; Cline 1979; Jackson and Castillo 1995; Phillips 1981). Jackson and Castillo (1995:6) identified this exploitation as an extension of the “sixteenth-century policy of *congregacion/reduction*.” In contrast, Costo (1987) noted that the transference of the Spanish Inquisition (originally established in 1478) to the New World that was the mechanism for this exploitation because the Inquisition contained economic and religious incentives. The Spanish

stronghold in California declined with Spain's loss of the Napoleonic Wars (1803–1815), which eliminated funding to the mission.

Mexican Period (AD 1821–1859)

Mexican independence from Spain occurred in 1821, and in 1833, Mexico secularized the missions. After secularization, large tracts of land were granted to private citizens. “The secularization of the missions during the Mexican period is usually regarded as a watershed in California History because it resulted in the replacement of one Hispanic institution by another – the rancho for the mission” (Phillips 1981:33). Like the mission, the rancho became the institution of native exploitation. This period experienced an increase in cattle ranching and the hide and tallow trade (Gallegos 1995; Wahoff and Dolan 2000). The passage of the Treaty of Guadalupe Hidalgo that ended the Mexican-American War in 1848 was the final event that culminated the Mexican period in California.

American Period (Post-AD 1850)

The concept of a two-ocean economy and the California Gold Rush were the impetus that brought about the annexation of California (1850) to the United States. A large number of immigrants entered California with the discovery of gold and the availability of free land with the passage of the Homestead Act (1863). This population increase caused the displacement of Native Californians and brought about a deterioration in their rituals and traditions (Carrico 1986; Gallegos 1995). During this period, the ranchos experienced a decline primarily in response to their inability to validate land ownership as a result of the California Land Claims Act of 1851. “With the discovery of gold, the building of the transcontinental railroad, and the development of crops and cities, people in massive numbers from all parts of the world began to inhabit the region” (Phillips 1981: editors’ introduction).

1.2.2 Records Search Results

Staff conducted a records search of the surrounding area using the California Historic Resources Inventory System (CHRIS) (Confidential Appendix B). Nineteen studies have been conducted within a half-mile radius (Table 1, Previous Studies within a 0.5-Mile Radius), and 23 sites were identified (Table 2, Previously Recorded Cultural Resources within a 0.5-Mile Radius). Thirty historic addresses, which are also identified as previous resources, were identified (Table 2 and Table 3, Previously Recorded Historic Addresses within a 0.5-Mile Radius). Of the previously recorded sites, one is prehistoric (CA-SDI-12522/P-37-012522) and 22 are historic (P-37-018184, -018185, -018207, -018208, -018209, -018210, -018211, -018212, -018213, -018214, -018215, -018216, -018217, -018218, -018219, -018220, -018221, -018222, -018223, -027643, -027644, -033557); however, none are within or adjacent to the project site. The nearest resources (historic buildings) are less than 0.10 mile east (P-37-018184) and southeast (P-37-018185) of the project site.

Four studies (Guerrero et al. 2001; Rosenberg et al. 2007; Robbins-Wade and Falvey 2015; Robbins-Wade and Turner 2020) have been conducted for the project site or portion thereof. All four studies were negative for resources. The most recent study, an update to the 2015 Helix Environmental study (Robbins-Wade and Falvey 2015), was conducted in 2020 by Helix Environmental (Robbins-Wade and Turner 2020) and was negative for resources.

Table 1. Previous Studies within a 0.5-Mile Radius

Report ID	Title	Author	Year
SD-00696	Archaeological Survey For The Proposed Widening Of South Santa Fe Avenue, Vista, California	Fink, Gary R.	1974
SD-02424	Archaeological Survey, Testing, And Evaluation Program For The North Countysquare II Project	Clevenger, Joyce, Delman James, And Kathleen Crawford	1992
SD-02548	Revised Archaeological Survey, Testing, And Evaluation Program For The North County Square II Project, City Of Vista, San Diego County, California	Clevenger, Joyce, Delman James, And Kathleen Crawford	1992
SD-02916	Cultural Resources Assessment Of AT&T'S Proposed San Bernardino To San Diego Fiber Optic Cable, San Bernardino, Riverside And San Diego Counties, California	Peak & Associates, Inc	1990
SD-07274	Historic Property Survey Report For The State Route 78 Corridor Enhancement Project 11-SD-78, P.M. 5.3-9.8, 965100 City Of Vista, California	Carrico, Richard	1995
SD-07991	Cultural Resource Study For The Hannalei Elementary School Project	Nighablain, Sinead	2002
SD-08113	Cultural Resource Assessment Cingular Wireless Facility No. Sd 922-01, San Diego County, CA	Duke, Curt	2002
SD-08546	First Supplemental Historic Property Survey Report: South Santa Fe Avenue Reconstruction Project	Dolan, Christy	2003
SD-09546	Cultural Resource Test Report For Oceanside-Escondido Rail Project Oceanside, California	Guerrero, Monica, Gallegos, Dennis, Stropes, Tracy, Bouscaren, Steve, Bugbee, Susan, And Cerreto, Richard	2001
SD-10383	Cultural Resources Inventory Of A 2.59-Acre Parcel And The Evaluation Of Two Historic Structures At 1365 And 1367 Clarence Drive, Tentative Parcel Map 20993, Near Vista, San Diego County, California	De Barros, Philip	2006
SD-10551	Cultural Resources Final Report Of Monitoring And Findings For The Qwest Network Construction Project, State Of California	Arrington, Cindy	2006
SD-11228	Historic Resource Survey, A Project Of The City Of Vista, California	Marben-Laird Associates	1987
SD-11524	A Cultural Resources Evaluation For The Vista And Buena Sanitation District 2007 Sewer Master Plan Update	Rosenberg, Seth A., Adriane Dorler, And Brian F. Smith	2007
SD-12008	Vista Inland Rail Trail Archaeological Survey	Robbins-Wade, Mary	2008
SD-12039	Cultural Resources Monitoring Report For The North County Transit District (NCTD) Sprinter Rail Project Oceanside To Escondido, California	Guerrero, Monica And Dennis R. Gallegos	2007
SD-14491	Anna Lane Property (PC 2-104) Cultural Resources Survey (Affinis Job No. 2551)	Robbins-Wade, Mary	2013
SD-16640	Cultural Resources Survey: Phillips Street Tentative Subdivision Map, Vista, San Diego County, California PC6-059	Robbins-Wade, Mary And Falvey, Nicole	2015

Table 1. Previous Studies within a 0.5-Mile Radius

Report ID	Title	Author	Year
SD-17647	Cultural Resources Monitoring Report For The Sierra Vista Townhomes Project, City Of Vista, San Diego County, California.	Smith, Brian F.	2018
SD-18244	Cultural Resources Survey, South Santa Fe Heights, City Of Vista, San Diego County, California	Robbins-Wade, Mary And Catherine A. Wright	2019

Table 2. Previously Recorded Cultural Resources within a 0.5-Mile Radius

Primary Number	Trinomial	Chronological Placement	Site Type	Size	Recorder, Date
P-37-012522	CA-SDI-12522	Prehistoric	BRM	50x110 meters	D.James, S.Campbell & S.Briggs 1991
P-37-018184	N/A	Historic	Single family Residence – Constructed 1935	—	P.S. Preservation Services 1999
P-37-018185	N/A	Historic	Single-family Residence – Constructed 1939	—	P.S. Preservation Services 1999
P-37-018207	N/A	Historic	Commercial Building – Constructed 1950-1955	—	P.S. Preservation Services 1999
P-37-018208	N/A	Historic	Commercial Building – Constructed ca. 1950	—	P.S. Preservation Services 1999
P-37-018209	N/A	Historic	Commercial Building – Constructed ca. 1950	—	P.S. Preservation Services 1999
P-37-018210	N/A	Historic	Commercial Building – Constructed ca. 1946	—	P.S. Preservation Services 1999
P-37-018211	N/A	Historic	Commercial Building – Constructed ca. 1945	—	P.S. Preservation Services 1999
P-37-018212	N/A	Historic	Commercial Building – Constructed ca. 1943	—	P.S. Preservation Services 1999
P-37-018213	N/A	Historic	Commercial Building – Constructed ca. 1946	—	P.S. Preservation Services 1999

Table 2. Previously Recorded Cultural Resources within a 0.5-Mile Radius

Primary Number	Trinomial	Chronological Placement	Site Type	Size	Recorder, Date
P-37-018214	N/A	Historic	Commercial Building – Constructed ca. 1950	—	P.S. Preservation Services 1999
P-37-018215	N/A	Historic	Single-family Residence – Constructed 1940	—	P.S. Preservation Services 1999
P-37-018216	N/A	Historic	Multi-family Residential (Duplex) – Constructed ca. 1955	—	P.S. Preservation Services 1999
P-37-018217	N/A	Historic	Single-family Residence – Constructed ca. 1950	—	P.S. Preservation Services 1999
P-37-018218	N/A	Historic	Single-family Residence – Constructed 1946 Church Building – Constructed 1985	—	P.S. Preservation Services 1999
P-37-018219	N/A	Historic	Single-family Residence – Constructed 1946	—	P.S. Preservation Services 1999
P-37-018220	N/A	Historic	Single-family Residence – Constructed 1946	—	P.S. Preservation Services 1999
P-37-018221	N/A	Historic	Single-family Residence – Constructed ca. 1950	—	P.S. Preservation Services 1999
P-37-018222	N/A	Historic	Commercial Building – Constructed ca. 1950	—	P.S. Preservation Services 1999
P-37-018223	N/A	Historic	Single-family Residence – Constructed 1952	—	P.S. Preservation Services 1999
P-37-027643	N/A	Historic	Single-family Residence – Constructed 1947	—	Philip de Barros 2006
P-37-027644	N/A	Historic	Single-family Residence – Constructed 1933	—	Philip de Barros 2006

Table 2. Previously Recorded Cultural Resources within a 0.5-Mile Radius

Primary Number	Trinomial	Chronological Placement	Site Type	Size	Recorder, Date
P-37-033557	N/A	Historic	Hwy 395 – abandoned	190x20 feet	Sarah Stringer-Bowsher 2018 A.Foglia & K.Keckeisen 2017 Haley Chasteene 2017 Kent Manchen & Matt DeCarlo 2015 Larry Tift 2013

Notes: — = Unknown; BRM = bedrock milling; N/A = not applicable

Table 3. Previously Recorded Historic Addresses within a 0.5-Mile Radius

Primary Number	Address	Historic Name	Common Name
P-37-018218	1812 Anna Lane	—	—
P-37-018218	1814 Anna Lane		
P-37-018218	1816 Anna Lane		
P-37-018218	1818 Anna Lane		
P-37-018218	1820 Anna Lane		
P-37-018218	1822 Anna Lane		
P-37-018219	1823 Anna Lane	—	—
P-37-018218	1824 Anna Lane		
P-37-018218	1826 Anna Lane		
P-37-018218	1828 Anna Lane		
P-37-018218	1830 Anna Lane	—	—
P-37-027643	1364 Clarence Drive	None	None
P-37-027644	1367 Clarence Drive	None	None
P-37-018223	116 Hannalei Drive	—	—
P-37-018216	138 Hesmay Drive	—	—
P-37-018185	1750 South Santa Fe Avenue	—	—
P-37-018215	1904 South Santa Fe Avenue	—	—
P-37-018214	1922 South Santa Fe Avenue	—	—
P-37-018213	1964 South Santa Fe Avenue	—	—
P-37-018212	1968 South Santa Fe Avenue	—	—
P-37-018211	1972 South Santa Fe Avenue	—	—
P-37-018210	1974 South Santa Fe Avenue	—	—

Table 3. Previously Recorded Historic Addresses within a 0.5-Mile Radius

Primary Number	Address	Historic Name	Common Name
P-37-018209	1984 South Santa Fe Avenue	—	—
P-37-018208	1988 South Santa Fe Avenue	—	—
P-37-018207	1990 South Santa Fe Avenue	—	—
P-37-018184	1547 Sunbury Court	—	—
P-37-018222	101 Woodland Drive	—	—
P-37-018220	109 Woodland Drive	—	—
P-37-018221	111 Woodland Drive	—	—
P-37-018217	114 Woodland Drive	—	—

Notes: — = Unknown

1.3 Applicable Regulations

Cultural resource regulations that apply to the project site are CEQA, California Health and Safety Code, provisions of the California Register of Historic Resources, and County Local Register. Historic and archaeological districts, sites, buildings, structures, and objects are assigned significance based on their exceptional value or quality in 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.

1.3.1 State Level Regulations

California Environmental Quality Act

According to CEQA, 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 Historic Resources (California Public Resources Code, Section 5024.1; 14 CCR 4852) including the following:

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

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

California Register of Historic Resources (California Public Resources Code, Section 5020 et seq.)

In California, the term “historical resource” includes but is not limited to “any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California” (California Public Resources Code, Section 5020.1[j]). In 1992, the California legislature established the CRHR “to be used by state and local agencies, private groups, and citizens to identify the state’s historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change” (California Public Resources Code, Section 5024.1[a]). A resource is eligible for listing in the CRHR if the State Historical Resources Commission determines that it is a significant resource and that it meets any of the following National Register of Historic Places (NRHP) criteria (California Public Resources Code, Section 5024.1[c]):

1. Associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage
2. Associated with the lives of persons important in our past
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values
4. Has yielded, or may be likely to yield, information important in prehistory or history

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

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

California Health and Safety Code, Section 7050.5

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

1.3.2 County of San Diego Regulations

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.

San Diego County Resource Protection Ordinance (RPO)

The County of San Diego's RPO protects significant cultural resources. 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 Places 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. The only exempt activity is scientific investigation. 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 inconsistent with County standards.

1.3.3 Native American Traditional Cultural Properties

Native American Heritage Values

Federal and state laws mandate that consideration be given to the concerns of contemporary Native Americans with regard to potentially ancestral human remains associated funerary objects and items of cultural patrimony. Consequently, an important element in assessing the significance of the study site has been to evaluate the likelihood that these classes of items are present in areas that would be affected by the proposed project.

Also potentially relevant to prehistoric archaeological sites is the category termed Traditional Cultural Properties in discussions of cultural resources management performed under federal auspices. According to Patricia L. Parker and Thomas F. King (1998), “Traditional” in this context refers to those beliefs, customs, and practices of a living community of people that have been passed down through the generations, usually orally or through practice. The traditional cultural significance of a historic property, then, is significance derived from the role the property plays in a community’s historically rooted beliefs, customs, and practices. Examples of properties possessing such significance include the following:

1. A location associated with the traditional beliefs of a Native American group about its origins, its cultural history, or the nature of the world;
2. A rural community whose organization, buildings and structures, or patterns of land use reflect the cultural traditions valued by its long-term residents;
3. An urban neighborhood that is the traditional home of a particular cultural group, and that reflects its beliefs and practices;
4. A location where Native American religious practitioners have historically gone, and are known or thought to go today, to perform ceremonial activities in accordance with traditional cultural rules of practice; and
5. A location where a community has traditionally carried out economic, artistic, or other cultural practices important in maintaining its historic identity.

A Traditional Cultural Property, then, can be defined generally as one that is eligible for inclusion in the NRHP because of its association with cultural practices or beliefs of a living community that (a) are rooted in that community’s history and (b) are important in maintaining the continuing cultural identity of the community.

2.0 GUIDELINES FOR DETERMINING IMPACT SIGNIFICANCE

For the purposes of this technical report, any of the following will be considered a potentially significant environmental impact to cultural resources:

1. The project causes a substantial adverse change in the significance of a historical resource pursuant to §15064.5 of the State CEQA Guidelines. This shall include the destruction, disturbance or any alteration of characteristics or elements of a resource that cause it to be significant in a manner not consistent with the Secretary of Interior Standards.
2. The project causes a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the State CEQA Guidelines. This shall include the destruction or disturbance of an important archaeological site or any portion of an important archaeological site that contains or has the potential to contain information important to history or prehistory.
3. The project disturbs any human remains, including those interred outside of formal cemeteries.
4. The project proposes activities or uses damaging to significant cultural resources as defined by the Resource Protection Ordinance and fails to preserve those resources.
5. The project proposes activities or uses that would impact tribal cultural resources as defined by Public Resources Code (PRC) §21074 of the State CEQA Statute.

Guidelines 1 and 2 are derived directly from CEQA. Sections 21083.2 of CEQA and 15064.5 of the State CEQA Guidelines recommend evaluating historical and archaeological resources to determine whether or not a proposed action would have a significant effect on unique historical or archaeological resources. Guideline 3 is included because human remains must be treated with dignity and respect and CEQA requires consultation with the “Most Likely Descendant” as identified by the Native American Heritage Commission (NAHC) for any project in which human remains have been identified.

Guideline 4 was selected because the Resource Protection Ordinance requires that cultural resources be considered when assessing environmental impacts. Any project that would have an adverse impact (direct, indirect, and cumulative) on significant cultural resources as defined by this Guideline would be considered a significant impact. The only exemption is scientific investigation.

Guideline 5 was selected because tribal cultural resources are of cultural value to Native American tribes. Any project that would have an adverse impact (direct, indirect, and cumulative) on tribal cultural resources as defined by PRC §21074 would be considered a significant impact.

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, as well as requirements listed in the Zoning Ordinance, General Plan, and the Grading, Clearing, and Watercourses Ordinance. Non-compliance would result in a project that is inconsistent with County standards.

3.0 ANALYSIS OF PROJECT EFFECTS

3.1 Methods

3.1.1 Survey Methods

The goal of this survey was to provide a constraints-level survey to supplement the survey that was completed by Helix Environmental (Robbins-Wade and Turner 2020) and to identify the location of any cultural resource that may be present on site. Donna Beddow, Harris and Associates senior archaeologist, and Natane Mojado, Luiseño Native American monitor, conducted the survey on July 19, 2021. Records searches were conducted for the project site and a 0.5 mile buffer. In addition, the NAHC was contacted for a Sacred Lands File check.

The field survey was conducted using standard archaeological procedures and techniques. The survey area included the 5.41 acres of parcel 183-060-84-00. Continuous parallel transects (five-meter) were walked primarily in a west–east direction in the northern portion of the project site and a south–north direction in the southern portion of the project site. For the most part, the project site is developed and visibility was fair. Areas including rodent burrows, baseball fields, and cleared areas were opportunistically surveyed for the presence of resources. The northern portion of the parcel surveyed is vegetated with non-native grasses, and the southern portion is developed with three baseball fields and a drainage. The drainage contains non-native vegetation.

The survey area was photographed (Appendix A) to document the environmental setting. California Department of Parks and Recreation (DPR) site forms were completed for the one identified isolate (P-37-039630) (Confidential Appendix C). The DPR forms and maps were submitted to the South Coastal Information Center.

Saving Sacred Sites provided the Native American (Luiseño) monitor, who participated in the field survey conducted by Harris. The Principal Investigator also discussed the project with Cami Mojado of the San Luis Rey Band of Mission Indians. Monitors are listed in Chapter 7.0, List of Preparers and Persons and Organizations Contacted.

3.1.2 Laboratory and Cataloging Procedures

All cultural material found during the survey was evaluated in the field and left in place. Only one potential artifact, a potential mano, was identified. Standard DPR forms were completed for the isolate that recorded provenience, artifact type, material, dimensions, and other attributes.

3.1.3 Artifact Conveyance

Only one artifact, a potential mano, was identified during the survey. It was left in place; therefore, artifact conveyance is not required.

3.1.4 Native American Participation/Consultation

The NAHC was contacted on July 13, 2021 for a Sacred Lands File check to determine whether sacred lands are present on site. The NAHC response was negative for resources and recommended that the list of Tribes provided be contacted for more information. All Tribal bands on the list provided by the NAHC were contacted for any information they may have regarding sacred sites that may be present on site.

The Jamul Band responded identifying that the project site is within their traditional use area. They requested to be informed as the project progresses and being maintained on the distribution list for project updates, report investigations, and any documentation related to discovered cultural resources. They stated that they may recommend monitoring pending the results of the cultural survey, and request that they be notified if the project boundaries extend beyond the current limits.

The San Pasqual Band also responded that the project site is within their traditional use area. They requested consultation so that they could help develop mitigation strategies to protect sites and mitigate adverse impacts.

The Rincon Band responded identifying that the project is within their specific Area of Historic Interest (AHI). They have concerns that the project may impact tangible Traditional Cultural Resources, Traditional Cultural Landscapes, and potential Traditional Cultural Properties. Rincon identifies that embedded within these resources and within the AHI are Rincon's history, culture, and continuing traditional identity. They recommend that an archaeological/cultural study be conducted and that a professional Tribal monitor from the Rincon Band be present during the survey.

The Luiseño Native American monitor, Natane Mojado, identified the area as sensitive and requested that the project be conditioned with an archaeological and Tribal monitoring program. In addition, Cami Mojado of the San Luis Rey Band also recommended the requirement of an archaeological and tribal monitoring program. Documentation related to Native American consultation is located in Confidential Appendix E.

3.2 Results

An isolate (P-37-039630) (Confidential Appendices C and D) was found by Natane Mojado during the survey of the project site. It is in the landscaped area just east of the church parking lot and south of the most westerly baseball field, and is out of context. The isolate is a potential mano fragment (mano fragment). The mano fragment was evaluated in the field, measures 8.5x9.0x5.5cm (lxwxh), and is of granitic material. Although smooth, it does not exhibit use wear. The isolate was recorded, photographed, and left in place.

4.0 INTERPRETATION OF RESOURCE IMPORTANCE AND IMPACT IDENTIFICATION

4.1 Resource Importance

4.1.1 Archaeological Resources

The isolate (P-37-039630) is, by definition, not a significant resource pursuant to CEQA or the RPO.

4.1.2 Historic Resources

No historic resources were identified during the survey.

4.1.3 Native American Heritage Resources/Traditional Cultural Properties

No information has been obtained from Native American outreach or communication with the Native American monitor during fieldwork that any of the evaluated resources are culturally or spiritually significant. No Traditional Cultural Properties that currently serve religious or other community practices are known to exist within the project area. During the current archaeological evaluation, no artifacts or remains were identified or recovered that could be reasonably associated with such practices. All prehistoric artifactual material consisted of a potential common ground stone tool, and in very limited quantity.

4.2 Impact Identification

One archaeological isolate has been identified within the project site. Isolate, P-37-039630 is within the project footprint and would be subject to direct impacts from project implementation. However, isolates are not significant by definition; therefore, mitigation is not required.

5.0 MANAGEMENT CONSIDERATIONS – MITIGATION MEASURES AND DESIGN CONSIDERATIONS

Impacts to cultural resources have been identified for the proposed project; however, as previously discussed the only resource identified was an archaeological isolate which is not significant by definition.

Due to the poor visibility and sensitivity of the area, it is recommended that both an archaeological monitor and a Luiseño Native American monitor be engaged to provide monitoring for earth-disturbing activities during project construction as described below.

Archaeological and Tribal Monitoring

Prior to approval of grading or improvement plans, the applicant shall:

- Pre-Construction
 - Contract with a County approved archaeologist to perform archaeological monitoring and a potential data recovery program during all earth-disturbing activities. The Project Archaeologist shall perform the monitoring duties before, during and after construction.
 - Pre-construction meeting to be attended by the Project Archaeologist and a Kumeyaay or Luiseño Native American monitor to explain the monitoring requirements.
- Construction
 - Monitoring. Both the Project Archaeologist and Kumeyaay or Luiseño Native American monitor are to be onsite during earth disturbing activities. The frequency and location of monitoring of native soils will be determined by the Project Archaeologist in consultation with the Kumeyaay or Luiseño Native American monitor. Both the Project Archaeologist and Kumeyaay or Luiseño Native American monitor will evaluate fill soils to ensure that they are negative for cultural resources
 - If cultural resources are identified:
 - Both the Project Archaeologist and Kumeyaay or Luiseño Native American monitor have the authority to divert or temporarily halt ground disturbance operations in the area of the discovery.
 - The Project Archaeologist shall contact the County Archaeologist, and culturally-affiliated tribes as identified in the Treatment Agreement and Preservation Plan at the time of discovery.
 - All ground disturbance activities within 100 feet of the discovered cultural resources shall be halted until a meeting is convened between the developer, the project archaeologist, tribal monitor(s), and the tribal representative(s) to discuss the significance of the find. Optionally, the County Archaeologist may attend the meeting to discuss the significance of the find.
 - Construction activities shall not resume in the area of discovery until an agreement has been reached by all parties as to appropriate mitigation. Work shall be allowed to continue outside of the buffer area and shall be monitored.

- Isolates and non-significant deposits shall be minimally documented in the field. The isolates and/or non-significant deposits shall be reburied onsite as identified in the Treatment Agreement and Preservation Plan.
- Treatment and avoidance of the newly discovered resources shall be consistent with the Treatment Agreement and Preservation Plan entered into with the appropriate tribes. This may include avoidance of the cultural resources through project design, in-place preservation of cultural resources located in native soils and/or re-burial on the Project property so they are not subject to further disturbance in perpetuity.
- If cultural resources are identified, one or more of the following treatments, in order of preference, shall be employed:
 - Preservation in place of the Cultural Resources, if feasible. Preservation in place means avoiding the resources, leaving them in place where they were found with no development affecting the integrity of the resources.
 - Reburial of the resources on the project property. The measures for reburial shall include, at least, the following:
 - Measures and provisions to protect the future reburial area from any impacts in perpetuity.
 - Reburial shall not occur until all legally required cataloging and basic recordation have been completed, with the exception that sacred items, burial goods, and Native American human remains are excluded.
 - Any reburial process shall be culturally appropriate.
 - Listing of contents and location of the reburial shall be included in the confidential appendix of the Monitoring Report.
 - The Monitoring Report shall be filed with the County under a confidential cover and is not subject to Public Records requests.
- If preservation in place or reburial is not feasible, a Research Design and Data Recovery Program (Program) shall be prepared by the Project Archaeologist in consultation with the Tribe, and the Kumeyaay or Luiseño Native American Monitor and approved by the County Archaeologist prior to implementation. There shall be no destructive or invasive testing on sacred items, burial goods, and Native American human remains. Results concerning finds of any inadvertent discoveries shall be included in the Monitoring Report.

Pursuant to California PRC §21083.2(b) avoidance is the preferred method of preservation for archaeological resources and cultural resources. If the landowner and the Tribe(s) cannot agree on the significance or the mitigation for the archaeological or cultural resources, these issues will be presented to the Planning & Development Services Director for decision. The Planning & Development Services Director shall make the determination based on the provisions of the California Environmental Quality Act with respect to archaeological resources, recommendations of the project archeologist and shall take into account the cultural and religious principles and practices of the Tribe.

- Human Remains.
 - The Property Owner or their representative shall contact the County Coroner and the PDS Staff Archaeologist.
 - Upon identification of human remains, no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin. If the human remains are to be taken offsite for evaluation, they shall be accompanied by the Kumeyaay or Luiseño Native American monitor.
 - If the remains are determined to be of Native American origin, the NAHC shall immediately contact the Most Likely Descendant (MLD).
 - The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by PRC §5097.98 has been conducted.
 - The MLD may with the permission of the landowner, or their authorized representative, inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site.
 - Public Resources Code §5097.98, CEQA §15064.5 and Health & Safety Code §7050.5 shall be followed in the event that human remains are discovered.
- Tribal Cultural Resources
 - If tribal cultural resources are discovered, the Project Archaeologist shall conduct consultation with culturally-affiliated tribes to determine the most appropriate mitigation. Should the two parties not be able to reach consensus, then the County Archaeologist shall consider the concerns of the culturally-affiliated tribe and the Project Archaeologist, and the Director of Planning & Development Services shall make a final decision regarding appropriate mitigation.
- Fill Soils
 - The Project Archaeologist and Luiseño Native American monitor shall evaluate fill soils to determine that they are clean of cultural resources.
- Rough Grading
 - Monitoring Report. Upon completion of Rough Grading, a monitoring report shall be prepared identifying whether resources were encountered. A copy of the monitoring report shall be provided to the South Coastal Information Center and any culturally-affiliated tribe who requests a copy.
- Final Grading
 - Final Report. A final report shall be prepared substantiating that earth-disturbing activities are completed and whether cultural resources were encountered. A copy of the final report shall be submitted to the South Coastal Information Center, and any culturally-affiliated tribe who requests a copy.

- Cultural Material Conveyance
 - The final report shall include evidence that all Native American cultural materials in order of preference have been conveyed as follows:
 - Evidence that all prehistoric materials collected during the archaeological monitoring program have been reburied.

or

- Evidence that all prehistoric materials collected during the grading monitoring program have been repatriated to a Native American group of appropriate tribal affinity. Evidence shall be in the form of a letter from the Native American tribe to whom the cultural resources have been repatriated identifying that the archaeological materials have been received.
- The final report shall include evidence that all historic materials have been curated at a San Diego curation facility and shall not be curated at a Tribal curation facility or repatriated. The collections and associated records, including title, shall be transferred to the San Diego curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility stating that the historic materials have been received and that all fees have been paid.

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7.0 LIST OF PREPARERS AND PERSONS AND ORGANIZATIONS CONTACTED

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The following agencies and individuals were contacted:

Edwin Romero	Barona Group of Capitan Grande
Ralph Goff	Campo Band of Diegueno Mission Indians
Michael Garcia	Ewiiapaayp Band of Kumeyaay Indians
Robert Pinto	Ewiiapaayp Band of Kumeyaay Indians
Virgil Perez	Iipay Nation of Santa Ysabel
Rebecca Osuna	Inaja-Cosmit Band of Indians
Erica Pinto	Jamul Indian Village
Lisa Cumper	Jamul Indian Village
Carmen Lucas	Kwaaymii Laguna Band of Mission Indians
Norma Contreras	La Jolla Band of Luiseno Indians
Javaughn Miller	La Posta Band of Diegueno Mission Indians
Gwendolyn Parada	La Posta Band of Diegueno Mission Indians
Angela Elliott Santos	Manzanita Band of Kumeyaay Nation
Michael Linton	Mesa Grande Band of Diegueno Mission Indians
Shasta Gaughen, Ph.D.	Pala Band of Mission Indians
Temet Aguilar	Pauma Band of Luiseno Indians
Mark Macarro	Pechanga Band of Indians
Paul Macarro	Pechanga Band of Indians
Cheryl Madrigal	Rincon Band of Luiseno Indians
Bo Mazzetti	Rincon Band of Luiseno Indians
Cami Mojado	San Luis Rey Band of Mission Indians
Allen Lawson	San Pasqual Band of Diegueno Mission Indians
John Flores	San Pasqual Band of Diegueno Mission Indians
Joseph Ontiveros	Soboba Band of Luiseno Indians
Isaiah Vivanco	Soboba Band of Luiseno Indians
Cody Martinez	Sycuan Band of the Kumeyaay Nation
Charlene Worrell-Elliott	Sycuan Band of the Kumeyaay Nation
Jamie LaBrake	Sycuan Band of the Kumeyaay Nation
John Christman	Viejas Band of Kumeyaay Indians
Ernest Pingleton	Viejas Band of Kumeyaay Indians

8.0 LIST OF MITIGATION MEASURES AND DESIGN CONSIDERATIONS

The following mitigation measures and design considerations will serve to mitigate project impacts to below a level of significance.

Site No.	Direct Impacts	Mitigation Measures	Design Considerations
P-37-039630	Yes	None – Not a significant resource.	None – Not a significant resource.
Unidentified Buried Resources	Unknown	None	Archaeological and Tribal Monitoring

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Appendix A. Photographs

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Photograph 1: Southeastern corner of project site.



Photograph 2: Southern boundary of project site.



Photograph 3: Drainage – eastern side of project site.



Photograph 4: Drainage – eastern side of project site.



Photograph 5: Drainage – eastern side of project site.



Photograph 6: Northern side of project site.



Photograph 7: Western side of project site.



Photograph 8: Western side of project site.

Appendix B. CHRIS Data

Under Separate Cover – See Confidential Appendices

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Appendix C. DPR Forms

Under Separate Cover – See Confidential Appendices

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Appendix D. Confidential Maps

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Appendix E. Sacred Lands File Check

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