Appendix B Cultural Resource Inventory Report for The Osuna Trail (Confidential)

RESOURCE INVENTORY REPORT FOR THE OSUNA SEGMENT OF THE COAST TO CREST TRAIL PROJECT, SAN DIEGO, CALIFORNIA

Prepared for:

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AUGUST 2021

Printed on 30% post-consumer recycled material.

National Archaeological Database (NADB) Information

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Project Proponent:	San Dieguito River Park Joint Powers Authority 18372 Sycamore Creek Road Escondido, California 92025
Report Date:	July 2021
Report Title:	Resource Inventory Report for the Osuna Segment of the Coast to Crest Trail Project, San Diego, California
Type of Study:	Cultural Resource Inventory
New Resources:	N/A
Updated Sites:	P-37-038576
USGS Quads:	Del Mar, California 1:24,000 (2018)
Acreage:	1.3 acres
Permit Numbers:	State Clearinghouse No. TBD
Keywords:	Positive Cultural Resources Monitoring, Disturbed, CEQA, Utility Poles, Municipal Water, Pump Station, Wells, Sewer, P-37-038576, Morgan Run Golf Course, San Dieguito River, Bridge

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AB	Assembly Bill
APE	Area of Potential Effects
CEQA	California Environmental Quality Act
CRHR	California Register of Historical Resources
DPR	Department of Parks and Recreation
JPA	Joint Powers Authority
NAHC	Native American Heritage Commission
NRHP	National Register of Historic Places
PRC	Public Resources Code
Project	Positive Resource Inventory Report for the Osuna Segment of the Coast to Crest Trail Project
SCIC	South Coast Information Center
SWRF	Satellite Water Recycling Facility

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Executive Summary

San Dieguito River Park Joint Powers Authority (JPA) proposes construction of a new bridge and Coast to Crest (CTC) trail extension (Project). The CTC Trail ends at the east end of the Polo Fields on the north side of the San Dieguito River and must cross the river to continue east (upstream). A small existing golf cart bridge crosses the river at the terminus of the CTC trail within the Morgan Run golf course (private property), located in unincorporated County of San Diego (County) jurisdiction. The purpose of this Project is to provide a dedicated bridge for pedestrians, bicyclists, and equestrians to safely cross the San Dieguito River, and to construct new trail to connect the dedicated bridge to the existing western and eastern extensions of the CTC Trail. The identified need for the Project is to allow the CTC Trail users unbroken access through this segment of the trail. The Project is located in the unsectioned western portion of the Del Mar, CA 7.5-minute series United States Geological Survey quadrangle.

A records search at the South Coast Information Center indicated that one cultural resource has been previously identified within the Project area of potential effects (APE). P-37-038576 is a utility power line that intersects the Project APE (see Table 2). The record search included a one-mile buffer. The buffer contains a total of 38 registered resources, consisting of 5 historic resources, and 33 prehistoric resources. A search of the Historic Resources Inventory resulted in 2 historic addresses identified within the one-mile buffer (Confidential Appendix A).

A sacred lands file search with the Native American Heritage Commission (NAHC) was conducted yielding negative results. Outreach letters to the tribes on the NAHC contact list were sent out. To date, Dudek has only received one response from the San Pasqual Band of Mission Indians. As government to government correspondence, Assembly Bill 52 consultation is the responsibility of the JPA. Field survey of the Project APE yielded no new cultural resources.

One previously recorded resource was documented within the Project APE, consisting of an in-use utility power pole alignment. This resource was determined not eligible for the CRHP/NRHP by its recording report in 2018 (O'Connor). While the resource is within the Project APE it is not within the Project ADI and will be avoided by Project design. Therefore, no significant resources will be impacted by the Project.

The proposed work would involve a minimal amount of ground disturbance in areas that have been developed between the 1960s and heavily through the 1980s. No further cultural review or monitoring is recommended as construction efforts will be limited to recently disturbed contexts due to previous landscaping and construction efforts.

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1 Project Description and Location

San Dieguito River Park Joint Powers Authority (JPA) plans the development of a 1-mile segment of the Coast to Crests (CTC) trail and a bridge over the San Dieguito River (Project). The Project would also include the addition of imported trail base (i.e., decomposed granite) along the eastern half where the trail exists in good repair. The western portion of the trail will involve the grading of a new path through disturbed surface soils and the construction of the new pedestrian bridge over the San Dieguito River. Construction design and final location of the bridge have yet to be determined. The JPA contracted Dudek to initiate the processing of a Cultural Resource Inventory in preparation for the proposed Project. This inventory has been prepared in accordance with the California Environmental Quality Act (CEQA).

The Osuna Segment of the Coast to Crest Trail Project (Project) is located on the border between North City and Rancho Santa Fe, in San Diego County, California. The Project is located in the unsectioned western portion of the Del Mar, CA 7.5-minute series United States Geological Survey quadrangle (Figure 1, Location Map). The Project is situated south of the Morgan Run Golf Course, and begins at Surf Cup Sports, crossing over the San Dieguito River, on the northern side of the Fairbanks Ranch Country Club, and extending onto Evergate Stables property then finally connecting at San Dieguito Rd. (Figure 2, Project APE). The Project primarily consists of linear trail management, (smoothing/grading of the pedestrian path and depositing new trail base and surface material), and the installation of a new pedestrian/equestrian bridge spanning the San Dieguito River. The Project does not extend onto the Morgan Run Golf Course.

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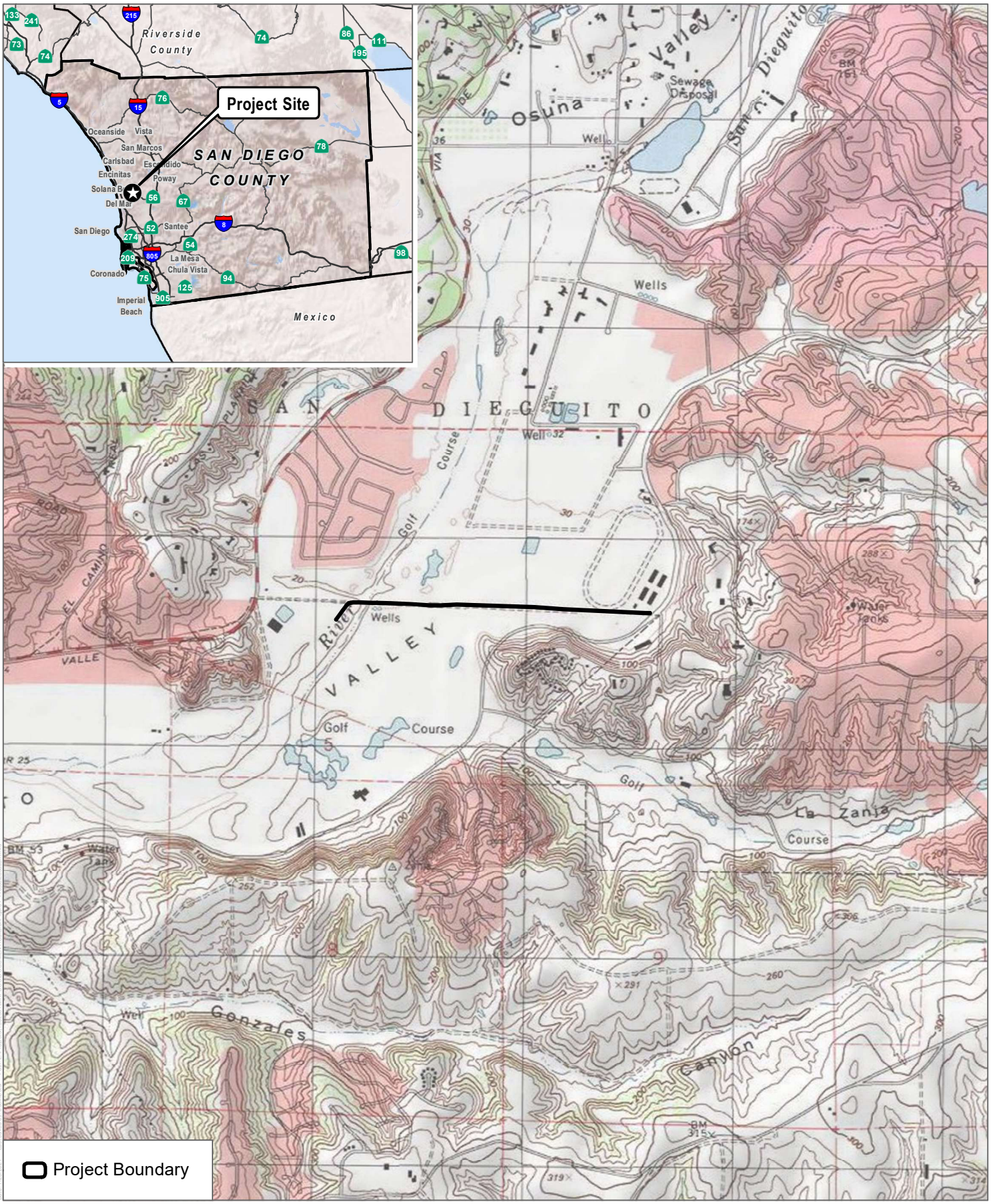

SOURCE: USGS 7.5-Minute Series Rancho Santa Fe & Del Mar Quadrangles

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0 1,000 2,000 Feet
0 285 570 Meters
1:24,000

FIGURE 1

Project Location

Osuna Trail Project

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SOURCE: USGS 7.5-Minute Series Rancho Santa Fe & Del Mar Quadrangles
Bing Maps 2021

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0 100 200 Feet

FIGURE 2-1

Project Area

Osuna Trail Project

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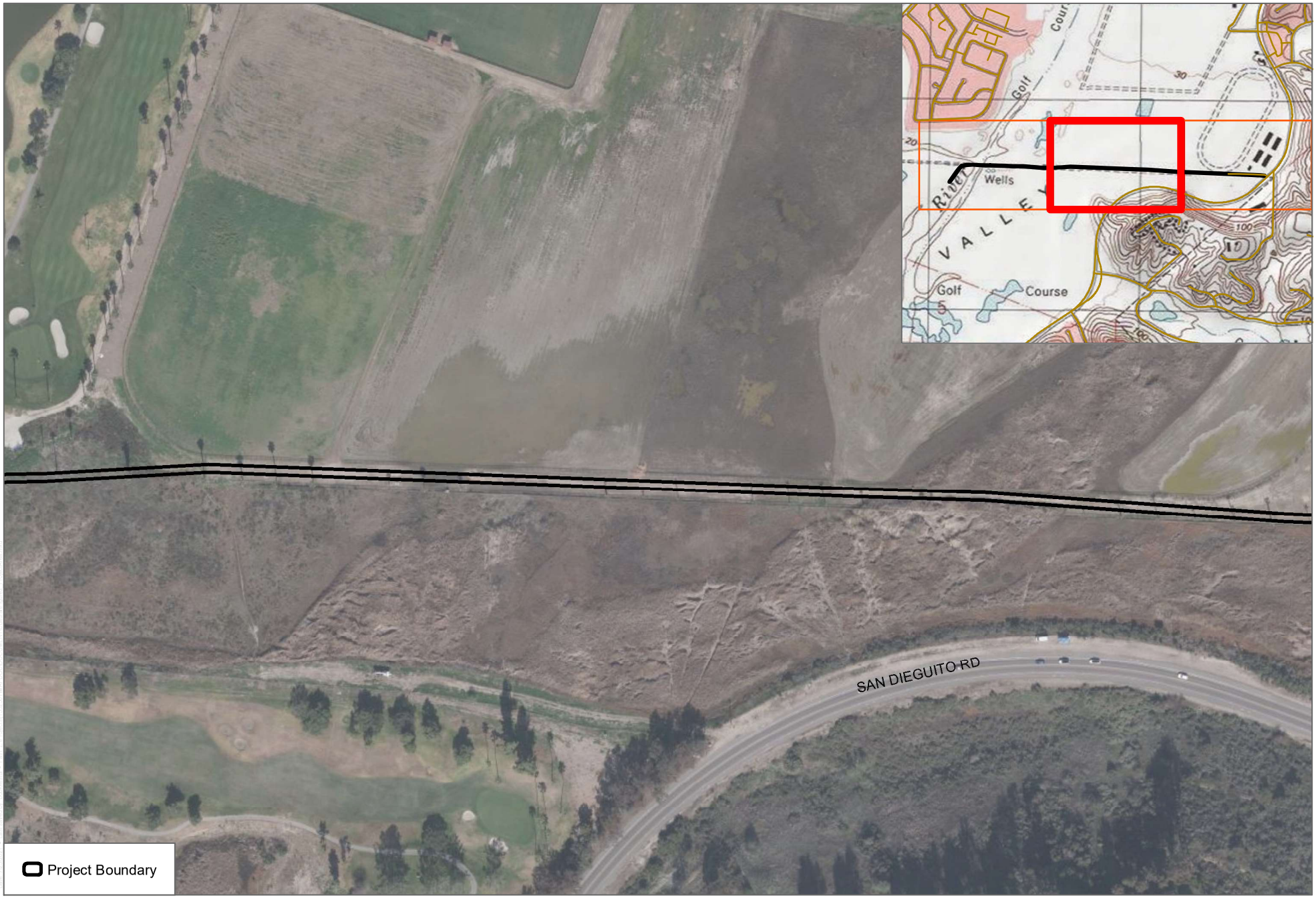

SOURCE: USGS 7.5-Minute Series Rancho Santa Fe & Del Mar Quadrangles
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FIGURE 2-2

Project Area

Osuna Trail Project

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SOURCE: USGS 7.5-Minute Series Rancho Santa Fe & Del Mar Quadrangles
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0 100 200 Feet

FIGURE 2-3
Project Area
Osuna Trail Project

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1.1 Regulatory Context

1.1.1 State Regulations

CEQA requires that all private and public activities not specifically exempted be evaluated for the potential to impact the environment, including effects to historical resources. Historical resources are recognized as part of the environment under CEQA. It defines historical resources as "any object, building, structure, site, area, or place, which is historically significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California" (Division I, Public Resources Code [PRC] Section 5021.1[b]).

Lead agencies have a responsibility to evaluate historical resources against the California Register criteria prior to making a finding as to a proposed Project's impacts to historical resources. Mitigation of adverse impacts is required if the proposed Project will cause substantial adverse change. Substantial adverse change includes demolition, destruction, relocation, or alteration such that the significance of an historical resource would be impaired. The CEQA Guidelines provide that a Project that demolishes or alters those physical characteristics of an historical resource that convey its historical significance (i.e., its character-defining features) can be considered to materially impair the resource's significance.

The California Register is used in the consideration of historic resources relative to significance for purposes of CEQA. The California Register includes resources listed in, or formally determined eligible for some California State Landmarks and Points of Historical Interest. Properties of local significance that have been designated under a local preservation ordinance (local landmarks or landmark districts), or that have been identified in a local historical resources inventory may be eligible for listing in the California Register and are presumed to be significant resources for purposes of CEQA unless a preponderance of evidence indicates otherwise.

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 (PRC SS5024.1, Title 14 CCR, Section 4852) consisting of the following:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or
2. It is associated with the lives of persons important to local, California, or national history; or
3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values; or
4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

CEQA was amended in 2014 through Assembly Bill (AB) 52, which created a new category of "tribal culture resources" that must be considered under CEQA, and applies to all Projects that file a Notice of Preparation or notice of negative declaration or mitigated negative declaration on or after July 1, 2015. AB 52 requires lead agencies to provide notice to and begin consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of a Project if that tribe has requested, in writing, to be kept informed of Projects by the lead agency prior to the determination whether a negative declaration, mitigated negative declaration, or environmental impact report will be prepared. If a tribe requests consultation within

30 days upon receipt of the notice, the lead agency must consult with the tribe. The bill also specifies mitigation measures that may be considered to avoid or minimize impacts on tribal cultural resources. Specifically, California PRC Section 21074 provides the following guidance:

(a) Tribal Cultural Resources are either of the following:

  (1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

    (A) Included or determined to be eligible for inclusion in the California Register of Cultural Resources.

    (B) Included in a local register of cultural resources as defined in subdivision (k) of §5020.1.

  (2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of §5024.1. In applying the criteria set forth in subdivision (c) of §5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

(b) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

(c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "nonunique archeological resource" as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

In the event that Native American human remains or related cultural material are encountered, Section 15064.5(e) of the state CEQA Guidelines (as incorporated from PRC Section 5097.98) and Health and Safety Code Section 7050.5 define the subsequent protocol. In the event of the accidental discovery or recognition of any human remains, excavation or other disturbances shall be suspended of the site or any nearby area reasonably suspected to overlie adjacent human remains or related material. Protocol requires that a county-approved coroner be contacted in order to determine if the remains are of Native American origin. Should the coroner determine the remains to be Native American, the coroner must contact the Native American Heritage Commission (NAHC) within 24 hours. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating, with appropriate dignity, the human remains and any associated grave goods as provided in PRC Section 5097.98 (California Code of Regulations, Title 14; Chapter 3; Article 5; Section 15064.5[e]).

1.2 Project Personnel

Dudek Archaeologist Adam Giacinto, M.A., RPA, acted as Principal Investigator for the Project, directed all archaeological survey, and co-authored the report. Archaeologists Jessica Colston co-authored the report. Archaeologist Scott Wolf and Native American Monitor, Shuluuk Linton, conducted the field survey. All archaeological personnel meet the Secretary of the Interior's Professional Qualifications Standards (PQS, 36 CFR Part 61) for archaeology.

1.3 Report Organization

Following this Project introduction, description, and definition of the Project's area of potential effects (APE), Section 2, Setting, describes the Project's physical setting and provides the relevant cultural/historic context. Section 3, Guidelines for Determining Significance, describes the guidelines for the determination of significance for cultural

resources. Section 4 contains the analysis of the Project effects, including the investigatory field methods and tribal correspondence. Section 5 provides the archival review and survey results and descriptions of resources. Section 6, Management Considerations, discusses the interpretation of the resources importance and the identification of impacts for management concerns. Finally, Section 7 provides a list of all references cited in this report. Several appendices accompany the report: Confidential Appendix A contains the Confidential SCIC Record Search Results, Appendix B with Tribal Outreach Correspondence, Appendix C with Project Personnel Resumes, and Confidential Appendix D with the Cultural Resources in APE Map.

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2 Setting

2.1 Natural Environment

The Project area is located in an open space zoned area of San Diego County and partially on City of San Diego lands. All existing vegetation consists of ornamental trees and shrubs and non-native grasses. A mix of native and ornamental plants appear to be present in the area.

Common animals within this area may include coyote (*Canis latrans*), California ground squirrel (*Spermophilus beecheyi*), striped skunk (*Mephitis mephitis*), Virginia opossum (*Didelphis virginica*), cottontail *(Sylvilagus audubonit),* black-tailed jackrabbit (*Lepus californicus bennettii*), deer mouse (*Peromyscus maniculatus*), sparrow (*Melospiza melodia*), lesser goldfinch (*Cardeulis psaltria*), common yellowthroat (*Geothlypis trichas*), as well as a number of other species of birds, mammals, reptiles and amphibians.

2.2 Cultural Context

Prehistoric and Ethnohistoric Periods

Evidence for continuous human occupation in the San Diego region spans the last 10,000 years. Various attempts to parse out variability in archaeological assemblages over this broad time frame have led to the development of several cultural chronologies; some of these are based on geologic time, most are based on temporal trends in archaeological assemblages, and others are interpretive reconstructions. Each of these reconstructions describes essentially similar trends in assemblage composition in more or less detail. This research employs a common set of generalized terms used to describe chronological trends in assemblage composition: Paleoindian (pre-5500 BC), Archaic (8000 BC.–AD 500), Late Prehistoric (AD 500–1750), and Ethnohistoric (post-AD 1750).

Paleoindian (pre-5500 BC)

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

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

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

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

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

If San Dieguito truly represents a distinct socioeconomic strategy from the non-San Dieguito Archaic processing regime, its rarity implies that it was not only short-lived, but that it was not as economically successful as the Archaic strategy. Such a conclusion would fit with other trends in southern California deserts, wherein hunting-related tools are replaced by processing tools during the early Holocene (Hall and Basgall 1993).

Archaic (8000 BC–AD 500)

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. If San Dieguito is the only recognized Paleoindian component in the San Diego region, then the dominance of hunting tools implies that it derives from Great Basin adaptive strategies and is not necessarily a local adaptation. Warren et al. (2004) admitted as much, citing strong desert connections with San Dieguito. Thus, the Archaic pattern is the earliest local socioeconomic adaptation in the San Diego region (Hale 2001, 2009).

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

Late Prehistoric (AD 500–1750)

The period of time following the Archaic and prior to Ethnohistoric times (AD 1750) is commonly referred to as the Late Prehistoric (Rogers 1945; Wallace 1955; Warren et al. 2004). However, several other subdivisions continue to be used to describe various shifts in assemblage composition, including the addition of ceramics and cremation practices. In northern San Diego County, the post-AD 1450 period is called the San Luis Rey Complex (Meighan and True 1977), while the same period in southern San Diego County is called the Cuyamaca Complex and is thought to extend from AD 500 until Ethnohistoric times (Meighan 1959). Rogers (1929) also subdivided the last 1,000 years into the Yuman II and III cultures, based on the distribution of ceramics. Despite these regional complexes, each is defined by the addition of arrow points and ceramics, and the widespread use of bedrock mortars. Vagaries in the appearance of the bow and arrow and ceramics make the temporal resolution of the San Luis Rey and Cuyamaca complexes difficult. For this reason, the term Late Prehistoric is well-suited to describe the last 1,500 years of prehistory in the San Diego region.

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

Ethnohistoric (post-AD 1750)

The history of the Native American communities prior to the mid-1700s has largely been reconstructed through later mission-period and early ethnographic accounts. The first records of the Native American inhabitants of the San Diego region come predominantly from European merchants, missionaries, military personnel, and explorers.

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

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

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

The traditional cultural boundaries between the Luiseño and Kumeyaay Native American tribal groups have been well defined by anthropologist Florence C. Shipek (1993; summarized by the San Diego County Board of Supervisors 2007:6]:

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

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

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

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

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

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

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

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

Historic Period (post-AD 1542)

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

Spanish colonial settlement was initiated in 1769, when multiple expeditions arrived in San Diego by land and sea, and then continued northward through the coastal plain toward Monterey. A military presidio and a mission were soon firmly established at San Diego, despite violent resistance to them from a coalition of native communities in 1776. Private ranchos subsequently established by Spanish and Mexican soldiers, as well as other non-natives, appropriated much of the remaining coastal or near-coastal locations (Pourade 1960–1967).

Mexico's separation from the Spanish empire in 1821 and the secularization of the California missions in the 1830s caused further disruptions to native populations in western San Diego County. Some former mission neophytes were absorbed into the work forces on the ranchos, while others drifted toward the urban centers at San Diego and Los Angeles or moved to the eastern portions of the county where they were able to join still largely autonomous native communities. United States conquest and annexation, together with the gold rush in Northern California, brought many additional outsiders into the region. Development during the following decades was fitful, undergoing cycles of boom and bust. With rising populations in the Nineteenth Century throughout the Southern California region, there were increased demands for important commodities such as salt.

San Diego during the American Period (1846–Present)

The American Period began in 1846 when United States military forces occupied San Diego; this period continues today. When United States military forces occupied San Diego in July 1846, the town's residents split on their course of action. Many of the town's leaders sided with the Americans, but other prominent families opposed the United States' invasion. In December 1846, a group of Californios under Andres Pico engaged United States Army forces under General Stephen Kearney at the Battle of San Pasqual and inflicted many casualties. However, the Californio resistance was defeated in two small battles near Los Angeles, and effectively ended the resistance by January 1847. The Americans assumed formal control with the Treaty of Guadalupe-Hidalgo in 1848, and introduced Anglo culture and society, American political institutions, and American commerce. In 1850, the Americanization of San Diego began to develop rapidly.

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

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

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

San Ysidro began to be developed around the turn of the 20th century. The early settlers were followers of the Littlelanders colonies movement. There, the pattern of development was designed to accommodate small plots of land for each homeowner to farm as part of a farming/residential cooperative community. Nearby Otay Mesa-Nestor

began to be developed by farmers of Germanic and Swiss background. Some of the prime citrus groves in California were in the Otay Mesa-Nestor area. In addition, there were grape growers of Italian heritage who settled in the Otay River Valley and tributary canyons who produced wine for commercial purposes.

San Diego State University was established in the 1920s, and development of the State College area began, including development of the Navajo community as outgrowth from the college area and from the west. There was farming and ranching in Mission Valley until the middle portion of the 20th century when the uses were converted to commercial and residential. There were dairy farms and chicken ranches adjacent to the San Diego River where now there are motels, restaurants, office complexes, and regional shopping malls. There was little development north of the San Diego River until Linda Vista was developed as military housing in the 1940s, when the federal government improved public facilities and extended water and sewer pipelines to the area. From Linda Vista, development spread north of Mission Valley to the Clairemont Mesa and Kearny Mesa areas. Development in these communities was mixed-use and residential on moderate-sized lots.

Tierrasanta, previously owned by the U.S. Navy, was developed in the 1970s. It was one of the first planned developments in the area with segregation of uses. Tierrasanta and many of the communities that have developed since, such as Rancho Penasquitos and Rancho Bernardo, represent the typical development pattern in San Diego in the last 25 to 30 years: uses are well segregated, with commercial uses located along the main thoroughfares and residential uses located beyond that. Industrial uses are located in planned industrial parks.

3 Guidelines for Determining Significance

According to CEQA (Section 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:

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.

The significance of an historical resource is materially impaired when a Project:

- 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 (CRHR); or
- demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the Project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- 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 CRHR 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:

- 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).
- If a lead agency determines that the archaeological site is an historical resource, it shall refer to the provisions of Section 21084.1 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.
- 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 intended to determine whether the Project location contains unique archaeological resources. 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 15064.5 (d) and (e) contain additional provisions regarding human remains. Regarding Native American human remains, paragraph (d) provides:

- When an initial study identifies the existence of, or the probable 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 SS5097.98. 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: 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); and the requirement of CEQA and the Coastal Act.

4 Analysis of Project Effects

4.1 Methods

4.1.1 Archival Methods

Dudek requested a California Historical Resources Information System records search at the South Coast Information Center (SCIC) on May 28, 2021 and received a response on June 9, 2021, for the Project and a one-mile radius surrounding the Project. This search included their collection of mapped prehistoric, historical and built-environment resources, Department of Parks and Recreation (DPR) Site Records, technical reports, archival resources, and ethnographic references. Additional consulted sources included the NRHP, California Inventory of Historical Resources/CRHR and listed Office of Historic Preservation Archaeological Determinations of Eligibility, California Points of Historical Interest, California Historical Landmarks, and Caltrans Bridge Survey information. Confidential Appendix A provides the confidential results of the records search and a bibliography of prior cultural resources studies.

4.1.2 Field Methods

Dudek Archaeologist Scott Wolf conducted an intensive pedestrian cultural survey of the proposed Project area on July 6, 2021. Shuluuk Linton, Native American monitor with RedTail Environmental Consulting, was present during survey of Project APE. Areas throughout the Project area were inspected at 10- and 15-meter transects. Archaeological survey exceeded the applicable Secretary of Interior Professional Qualifications Standards for archaeological survey and evaluation. The Project APE was subject to a 100% survey with transects spaced no more than 5 meters apart wherever possible and oriented in cardinal directions. Survey crew was equipped with a GPS receiver. Location-specific photographs were taken using an Apple 3rd Generation IPAD equipped with 8 MP resolution and georeferenced PDF maps of the Project area. Accuracy of this device ranged between 3 meters and 10 meters. Evidence for buried cultural deposits was sought through inspection of natural or artificial erosion exposures and the spoils from rodent burrows.

Documentation of cultural resources complied with the Office of Historic Preservation and Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation (48 FR 44716-44740) and the California Office of Historic Preservation Planning Bulletin Number 4(a). All sites identified during this inventory were recorded on California Department of Parks and Recreation Form DPR 523 (Series 1/95), using the Instructions for Recording Historical Resources (Office of Historic Preservation 1995).

4.1.3 Native American Participation/Consultation

As part of the process of identifying cultural resources within or near the Project, Dudek contacted the NAHC to request a review of the Sacred Lands Filed. Included in this report are the results of the request for the on-site impacts, the results of which are negative.

A NAHC search of the Sacred Lands File was requested on June 3, 2021, with results provided on June 25, 2021 and resulted in a negative finding for Traditional Cultural Properties (TCPs) or Sacred Sites that have been identified to be within the Project area, or a surrounding one-mile radius (Confidential Appendix A). Tribal outreach letters were sent to those representatives provided on the NAHC Contact List (Appendix B). One response from Angelina

Gutierrez of the San Pasqual Band of Mission Indians on July 17, 2021, indicating that the Project area has cultural significance to the San Pasqual Band of Mission Indians and requests to engage in the government-to-government consultation. Access to any cultural resource reports resulting from this Project are also requested. A copy of the letter is enclosed in Appendix B. If any more responses are forthcoming, they will be forwarded to the JPA.

The proposed Project is also subject to compliance with AB 52 (PRC 21074) which requires consideration of impacts to "tribal cultural resources" as part of the CEQA process. AB 52 requires the JPA, lead agency responsible for CEQA compliance for the proposed Project, to notify any groups (who have requested notification) of the proposed Project who are traditionally or culturally affiliated with the geographic area of the Project. Because AB 52 is a government-to-government process, all records of correspondence related to AB 52 notification and any subsequent consultation are on file with the JPA.

Shuluuk Linton, a Native American monitor with RedTail Environmental Consulting, visited all identified cultural sites and assisted in the pedestrian field inventory of the Project site. Mr. Linton did not express any specific concerns relating to the Project.

5 Results

5.1 Archival Review

An SCIC records search conducted on June 9, 2021, resulted in 11 reports that intersect with the Project area (Table 1), with 79 in the one-mile buffer (Confidential Appendix A). One report provides directly relevant and recent information for this Project: SD-00672 and SD-17891.

Report SD-00672 is an overview for the entire area surrounding the proposed Project was conducted by Gallegos in 1988.

Report SD-17891 was produced in 2018 by ECORP Consulting, INC. and authored by John O'Connor. The report consists of a cultural assessment of the alignment for a water pipeline extension. This report surveyed and evaluated the golf course for NRHP status, and concludes that the property does not retain any significance conveying features, and therefore is non-significant under the Section 106 guidelines.

Table 1. Reports Within the Project APE

Report #	Year	Title	Publisher
SD-00074	1981	ARCHAEOLOGICAL RECONNAISSANCE OF THE FAIRBANKS COUNTRY CLUB.	AMERICAN PACIFIC ENVIRONMENTAL CONSULTANTS, INC.
SD-00672	1988	A CULTURAL RESOURCE OVERVIEW FOR THE SAN DIEGUITO RIVER VALLEY SAN DIEGO, CALIFORNIA.	GALLEGOS, DENNIS, ROXANA PHILLIPS, AND ANDREW PIGNIOLO
SD-01891	1983	NATIONAL REGISTER ASSESSMENT OF SDI-8225	MOONEY-LETTIERI AND ASSOCIATES, INC.
SD-02148	1984	DRAFT ENVIRONMENTAL IMPACT REPORT RANCHO DEL RAYO ESTATES (TM 4413) LOG#83-13-20	A.D. HINSHAW ASSOCIATES
SD-02149	1984	DRAFT ENVIRONMENTAL IMPACT REPORT WHISPERING PALMS SANITATION DISTRICT EXPANSION PLAN LOG#84-13-18	A.D. HINSHAW ASSOCIATES
SD-02725	1981	APPENDIX C ARCHAEOLOGICAL RECONNAISSANCE OF THE FAIRBANKS COUNTRY CLUB, SAN DIEGO COUNTY	COOK, JOHN
SD-04235	1983	NATIONAL REGISTER ASSESSMENT OF SDI-8225	MOONEY-LETTIERI AND ASSOCIATES
SD-04236	1981	ENVIRONMENTAL IMPACT REPORT FOR SAN DIEGUITO RIVER STUDY DRAFT CONCEPTUAL MASTER PLAN	APEC (AMERICAN PACIFIC ENVIRONMENTAL CONSULTANTS, INC.)
SD-11623	2002	SAN DIEGUITO RIVER VALLEY INVENTORY OF ARCHAEOLOGICAL RESOURCES	HECTOR, SUSAN M. and ALICE BREWSTER
SD-16881	2016	NEGATIVE CULTURAL RESOURCES PHASE I SURVEY FOR THE EL APAJO DRAINAGE PROJECT, RANCHO RASEANA, RANCHO SANTA FE, CALIFORNIA	PHAM, ANGELA and COMEAU, BRAD
SD-17891	2018	CULTURAL RESOURCES SURVEY REPORT FOR THE 153A RECYCLED WATER PIPELINE EXTENSION PROJECT, CITY OF SAN DIEGO, SAN DIEGO	O'CONNOR, JOHN T.

The record search indicated that one cultural resource has been previously identified within the Project APE. P-37-038576 is a utility power alignment (Table 2). The record search identified 38 additional registered resources within one mile of the Project APE. The resources include four historic resources (an isolate, water conveyance system, trash scatter, cultural landscape). Prehistoric resources in the buffer consist of one multicomponent site, 15 temporary camps, four artifact scatters, five isolates, one habitation site, and one unknown period hearth feature. A search of the Historic Resources Inventory resulted in two historic addresses (15770 Via De La Valle, and 0 Las Planideras) identified within the one-mile buffer (Confidential Appendix A).

Table 2. Resources Within Project Research Area

Primary	Trinomial	Period	Description	CRHP Eligibility	Intersect?
P-37-038576	–	Historic	Utility line	Not Eligible	Yes
P-37-000194	CA-SDI-000194	Prehistoric	Habitation	Untested	No
P-37-000322	CA-SDI-000322	Prehistoric	Temporary Camp	Untested	No
P-37-005119	CA-SDI-005119	Prehistoric	Lithic Scatter	Untested	No
P-37-005154	CA-SDI-005154	Prehistoric	Temporary Camp	Untested	No
P-37-005155	CA-SDI-005155	Prehistoric	Temporary Camp	Untested	No
P-37-005373	CA-SDI-005373	Prehistoric	Temporary Camp	Untested	No
P-37-005593	CA-SDI-005593	Prehistoric	Temporary Camp	Untested	No
P-37-005612	CA-SDI-005612	Prehistoric	Artifact Scatter	Untested	No
P-37-006696	CA-SDI-006696	Prehistoric	Temporary Camp	Untested	No
P-37-006700	CA-SDI-006700	Prehistoric	Temporary Camp	Untested	No
P-37-006701	CA-SDI-006701	Prehistoric	Temporary Camp	Untested	No
P-37-006913	CA-SDI-006913	Prehistoric	Lithic Scatter	Untested	No
P-37-008023	CA-SDI-008023	Prehistoric	Temporary Camp	Untested	No
P-37-008226	CA-SDI-008226	Prehistoric	Lithic Scatter	Untested	No
P-37-008227	CA-SDI-008227	Prehistoric	Temporary camp	Untested	No
P-37-008228	CA-SDI-008228	Prehistoric	Lithic Scatter	Untested	No
P-37-008590	CA-SDI-008590	Dual	HPRD and Temp. Camp	Untested	No
P-37-008818	CA-SDI-008818	Prehistoric	Artifact scatter	Untested	No
P-37-009096	CA-SDI-009096	Prehistoric	Temporary Camp	Untested	No
P-37-009777	CA-SDI-009777	Prehistoric	Temporary Camp	Untested	No
P-37-009780	CA-SDI-009780	Prehistoric	Temporary Camp	Untested	No
P-37-010243	CA-SDI-010243	Prehistoric	Artifact Scatter	Untested	No
P-37-010749	CA-SDI-010749	Prehistoric	Artifact Scatter	Untested	No
P-37-013090	CA-SDI-013090	Historic	Trash Scatter	Untested	No
P-37-013091	CA-SDI-013091	Prehistoric	Lithic Scatter	Untested	No
P-37-013092	CA-SDI-013092	Prehistoric	Lithic Scatter	Untested	No
P-37-013093	CA-SDI-013093	Prehistoric	Lithic Scatter	Untested	No
P-37-014112	–	Prehistoric	Ceramic	Untested	No
P-37-015296	–	Prehistoric	Flake and flake tool	Untested	No
P-37-015297	–	Prehistoric	Flake	Untested	No
P-37-015825	CA-SDI-014434	Prehistoric	Temporary Camp	Not Eligible	No
P-37-025681	CA-SDI-017079	Unknown	Hearth Feature	Untested	No
P-37-029050	CA-SDI-018608	Prehistoric	Temporary Camp	Untested	No
P-37-029941	–	Prehistoric	Sandstone Bowl	Not Eligible	No

Table 2. Resources Within Project Research Area

Primary	Trinomial	Period	Description	CRHP Eligibility	Intersect?
P-37-032799	–	Prehistoric	Mano	Not Eligible	No
P-37-035277	–	Historic	Rancho Santa Fe - Cultural Landscape	Eligible	No
P-37-038575	–	Historic	Water Conveyance System	Untested	No
P-37-038924	–	Historic	Glass Bottle	Not Eligible	No

P-37-038576

This resource is a segment of the electric transmission line, currently in service, consisting of wooden poles along the southern border of the Morgan Run Golf Course property. The resource was originally recorded by John O'Connor of ECORP Consulting, Inc., in September of 2018. This resource was recorded as part of a cultural resource inventory for a reclaimed water line. This resource has been previously evaluated for NRHP/CRHP significance and was determined to be Not Eligible by O'Connor (2018).

5.2 Aerial Imagery Analysis

Historic aerial photographs for the Project site are available from 1947, 1953, 1964, 1966, 1967, 1978, 1980-1991, 1993-2000, 2002, 2003, 2005, 2009, 2010, 2012, 2014, 2016 and 2018 (NETR 2021). Historic topographic maps consulted were from 1903, 1909, 1913, 1920, 1927, 1929, 1934, 1940, 1942, 1943, 1954, 1955, 1959, 1960, 1966, 1970, 1976, 1978, 2000, 2012, 2015, and 2018. Topo maps show the area having only a road on the western side of the San Dieguito Valley and another on the eastern side. During the period between 1954 to 1970 the San Dieguito River through the project area is shown only as a dry drainage. Aerial imagery during this period confirms that the river valley was dry and disturbed. The aerial images show that the current Morgan Run Golf Course property line, on the western half of the Project site, was actively disturbed for agriculture as early as 1953, as seen in Figure 3. The eastern half of the alignment appears to also have been disturbed by agricultural activities during this time. In 1966 the preparation for the current golf course is visible. The western half of the Project area was intensely graded and landscaped during the installation of the golf cart bridge in 1978-1980. The following year, the entire western half of the Project area was graded to raise a large berm on the south side of the current Project site alignment. This berm clearly has vegetation planted on its southern side. The earthen berm is in the current Project APE.

5.3 Survey Results

The intensive pedestrian survey conducted July 7, 2021, identified no new cultural resources within the current APE limits. Visibility was moderate to good (50%-100%) overall. The western section had partial vegetation cover, whereas the entire eastern half of the alignment was completely visible in an existing trail. The western half of the Project area, including the future bridge location was obviously in an area of heavy disturbance. The alignment transitions from the dirt path to a sandy dune engineered berm along the southern border of the Morgan Run Golf Course.

Site relocation efforts for P-37-038576 was part of the intensive pedestrian survey. Resource P-37-038576, is a wood-pole utility power line alignment and wood power poles. This resource is located in a current built environment

that includes this electric utility alignment, the existing water alignment, associated elements and debris of the water department utilities, the surrounding golf course utilities and access routes and the northern end of the athletic park fields to the south. Dudek archaeologist Scott Wolf, with Redtail Environmental Inc., Native American Monitor, Shuuluk Linton, revisited the location of this power alignment on July 07, 2021, for the Osuna Valley Trail cultural survey. P-37-038576 was relocated and found to have no obvious changes since the previous recordation of the alignment. No additional elements and/or artifacts were identified in association with this utility resource.

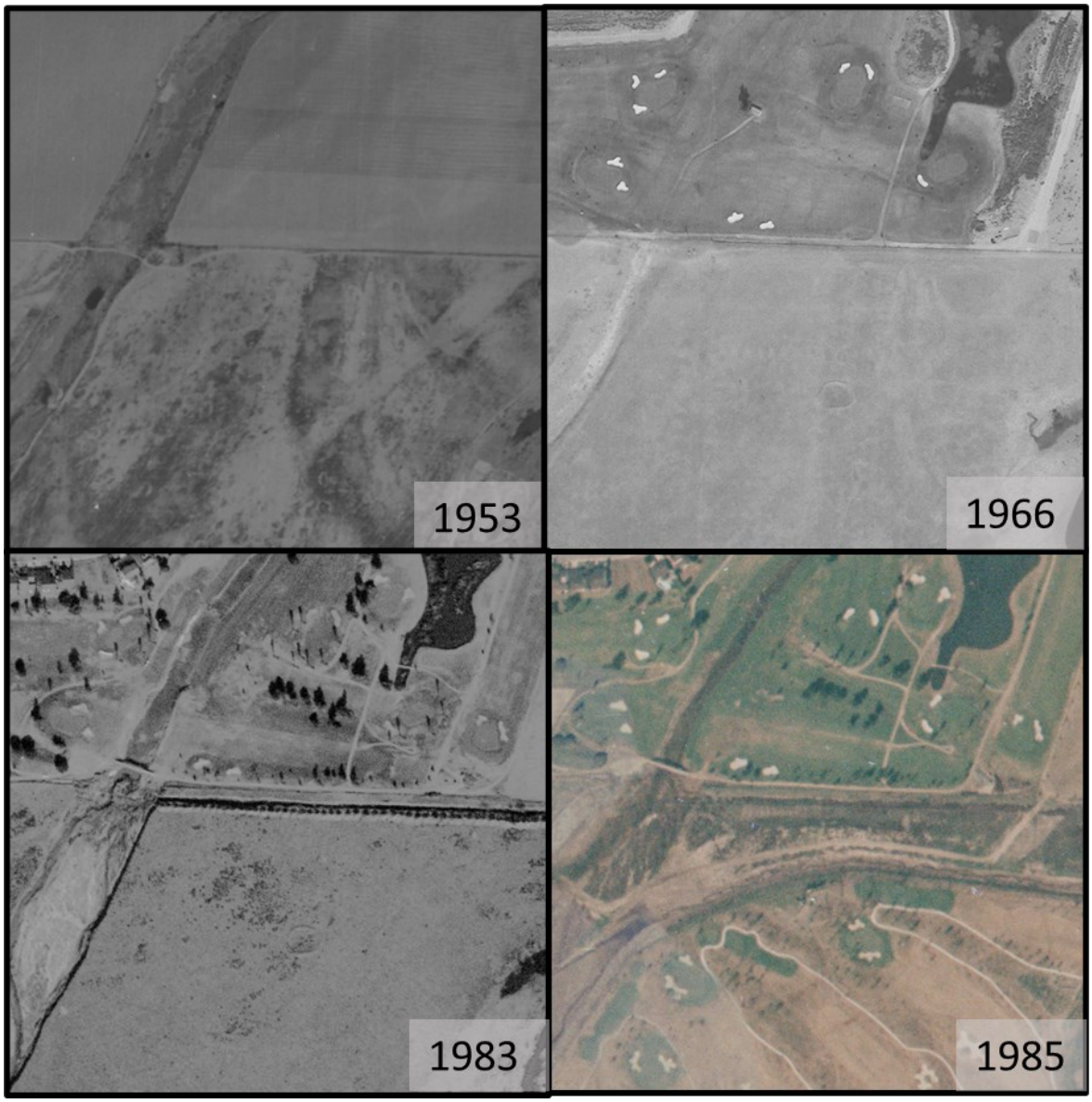

Figure 3. Aerial images of the western half of the Project, adjacent to the Morgan Run Golf Course.

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6 Management Considerations

6.1 Resource Importance

This inventory identified one cultural resource within the Project APE. P-37-038576, the utility power line, was evaluated under Section 106 due to its historic era construction and was determined to not be eligible for the CRHP/NRHP (O'Connor 2018). Because it is not eligible for listing, the resource does not warrant any further cultural review. However, because it is an active electrical distribution line, Project activities will avoid impacts to P-37-038576.

6.2 Impact Analysis

This inventory identified one not eligible cultural resource within Project APE. The historic age utility line P-37-038576 has been evaluated as not eligible for the CRHP/NRHP therefore no impacts will be made to significant resources.

6.3 Recommendations

Based on the current Project design, no known significant cultural resources will be impacted as a result of the proposed Project's ground disturbing activities. This cultural resource inventory identified one historical/built environment resources within the Project APE, P-37-038576. This resource has been previously recommended not significant under CEQA and requires no additional cultural review. However, this resource will be avoided by Project impacts as it is a currently functioning utility line.

The potential for unknown significant prehistoric and historic archaeological resources to exist within the Project site is low. The negative finding by the NAHC Sacred Lands File decreases the potential for archaeological resources. Tribal outreach correspondence indicates that the Project vicinity, San Dieguito River Valley, is an area of sensitivity for the San Pasqual Tribe of Mission Indians, however none of their recorded resources were within the Project APE. Given the highly disturbed nature of the Project site, and the superficial impacts of the Project design, no archaeological monitoring is recommended. The recommendation of no further archaeological work for the proposed Project is presumed pending the results of consultation between the JPA and Native American groups under AB 52. If tribal contacts identify cultural resources within the Project site, the JPA will work in cooperation with Native American tribal representatives to determine if monitoring or other treatment measures are necessary. As the lead agency under CEQA, the JPA is responsible for formal government-to-government consultation with the Tribes under AB 52. If requested, Dudek will assist the JPA in that process.

In the event that archaeological resources are exposed during construction, work in the immediate vicinity of the find should be halted or directed to another location until a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards can evaluate the significance of the find. Construction activities may continue in other areas but should be redirected a safe distance from the find. If the new discovery is evaluated and found to be significant under CEQA and avoidance is not feasible, additional work such as data recovery may be warranted.

In the event of the discovery of human remains during ground disturbing activities, the State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur in areas which could contain human remains until the County coroner has made a determination of origin and disposition pursuant to PRC

Section 5097.98. The County coroner must be notified of the find immediately. If the human remains are determined to be of Native American origin, the coroner will notify the NAHC within 24 hours. The NAHC will then determine and notify a MLD. The MLD shall complete the inspection of the site within 48 hours of notification and may recommend means of treating or disposing of, with appropriate dignity, the human remains and items associated with Native Americans.

7 Bibliography

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Appendix A (Confidential)

SCIC Record Search Results

Appendix B

NAHC Results and Tribal Correspondence

Appendix C

Personnel Resumes

Appendix D (Confidential)

Resources in APE Map