



October 12, 2020

Pete Shearer
SD Riverwalk, LLC
4747 Executive Drive
Suite 410
San Diego, California 92121
Pete.Shearer@hines.com

RE: Revised Non-Confidential Addendum to the Class III Cultural Resource Inventory for the Riverwalk Project in Mission Valley, City of San Diego, California

1.0 INTRODUCTION

This report serves as an addendum to the report entitled *Cultural Resources Inventory Report for the Riverwalk Project, City of San Diego, County of San Diego, California* prepared by Spindrift Archaeological Consulting, LLC (Spindrift) for the proposed Riverwalk development project (Project) located in the neighborhood of Mission Valley West (Garcia-Herbst 2017). The Spindrift report is an archaeological resource management report (ARMR) that provides the results of a Class III Inventory for the Project that included a summary of the previously recorded cultural resources within 1 mile of the Project area, the results of a pedestrian survey of the proposed Project area, and cultural resource management recommendations for the next phase of the Project. The results of the pedestrian survey provided in the Spindrift report are thorough and provide valuable information on the archaeological resources previously identified within the Project area of potential effect (APE) and their current surficial condition. However, additional information regarding the sites' significance status under applicable local, State, and Federal regulations is needed along with additional mitigation measures for the cultural resources within the APE due to the sensitive nature of the known resources and the complex topography and construction history associated with the Riverwalk Golf Course (formerly the Stardust Golf Course) that currently occupies the proposed APE.

The Riverwalk project proposes an amendment to the existing Levi-Cushman Specific Plan to replace the 195-acre Riverwalk property with the Riverwalk Specific Plan and redevelop the existing golf course as a walkable, transit-centric, and modern live-work-play mixed-use neighborhood that features an expansive River Park along the San Diego River. The mix and quantity of land uses would change from what is approved in the existing Levi-Cushman Specific Plan to include 4,300 multi-family residential dwelling units; 152,000 square feet of commercial retail space; 1,000,000 square feet of office and non-retail commercial; approximately 95 acres of park, open space, and trails; adaptive reuse of the existing golf clubhouse into a community amenity; and a new Green Line Trolley stop within the development. Improvements to surrounding public infrastructure and roadways would be implemented as part of the Riverwalk project, including improvements to the Fashion Valley Road crossing of the San Diego River as a 10- to 15-year storm event crossing. The project would also include a habitat restoration effort on-

site to create and/or enhance 25.16 acres of native habitats along the San Diego River, within and adjacent to the MHPA, and setting aside area for establishing a future wetland habitat mitigation bank.

The project would establish Irrevocable Offers of Dedication (IODs) for two Community Plan Circulation Element roadways envisioned in the Mission Valley Community Plan Update: future Riverwalk Street “J,” which would cross the San Diego River in a north-south direction; and future Riverwalk Street “U,” which would travel approximately east-west along the southern project site boundary and connect to future Street “J.” Street “J” would be an elevated roadway crossing the river valley. Per the City’s Planning Department, these roads are regional facilities with uncertain funding, design, and construction timing. While these improvements would not be constructed as part of the project, the project would grant the City IODs for the required rights-of-way to construct these roads in the future.

This addendum serves to provide additional information on the significance of the archaeological sites within the Project APE and a set of modified cultural resource management recommendations for those sites. Spindrift identified a total of 11 archaeological sites and one prehistoric isolate that intersect the Project APE. Sites SDI-11767 and SDI-12220 were evaluated and recommended eligible for listing in the National Register of Historic Places (NRHP) and significant under the California Environmental Quality Act (CEQA) and City of San Diego guidelines (Kyle and Gallegos 1995a; Pignoli 1994; Pignoli and Huey 1991). A data recovery was later conducted at SDI-11767 to mitigate impacts to the site in association with the Mission Valley West Light Rail Transit (LRT) Project (Cooley and Mitchell 1996). Site SDI-12126 was tested and determined significant under City of San Diego guidelines and CEQA criteria (Kyle and Gallegos 1995b). Sites SDI-11722/H, SDI-11766/H (Pignoli and Huey 1991), SDI-12127 (Pignoli and Huey 1994), SDI-12128, SDI-12129, SDI-12132, and SDI-12862 (Kyle and Gallegos 1995) were all tested and identified as not significant cultural resources under City of San Diego guidelines and CEQA criteria. The isolate (P-31-014936) was a quartzite flake tool and has been collected. Isolates are considered de facto not significant and no further archaeological work is required for that resource. Based on available records, SDI-4675 has not been evaluated, but only a portion of the site intersects the Project area and will not likely be impacted as it is in an open space area.

This addendum is organized as follows. After this introduction, we provide a brief description of the local and State regulations for cultural resource management followed by a summary of the previous work conducted at each of the archaeological sites that intersect the APE that includes a clear statement regarding each site’s significance status in the context of state, local, and if applicable, federal designation criteria. Lastly, the findings and conclusions section will provide a discussion of the potential impacts of the proposed Project and whether they may be significant, mitigation measures to lower the impact to sites to below the level of significance, and a brief conclusion that summarizes the findings and recommendations.

2.0 EXISTING REGULATIONS AND POLICIES

This section is drawn directly from the City of San Diego's Land Development Code Historical Resources Guidelines (HRG 2001) and are used as a guide for the impacts discussion and recommended mitigation measures in the Findings and Conclusions section of this addendum.

2.1 City of San Diego Applicable Policies and Regulations

The public stewardship and management of historical resources are provided for in the local, state and federal policies and regulations that form the basis for the City of San Diego's development review process.

1. Progress Guide and General Plan

The Historical Preservation Element of the City of San Diego's *General Plan* was adopted in 2008. The stated goals of the Historic Preservation Element are:

- Identification of the historical resources of the City.
- Preservation of the City's important historical resources.
- Integration of historic preservation planning in the larger planning process.
- Public education about the importance of historical resources.
- Provision of incentives supporting historic preservation.
- Cultural heritage tourism promoted to the tourist industry.

To achieve these goals, the Historic Preservation Element provides nine policies to guide historical resources management activities. Among these are the following:

- HP-A.1. Strengthen historic preservation planning.
- HP-A.2. Fully integrate the consideration of historical and cultural resources in the larger land use planning process.
- HP-A.3. Foster government-to-government relationships with the Kumeyaay/Diegueño tribes of San Diego.
- HP-A.4. Actively pursue a program to identify, document and evaluate the historical and cultural resources in the City of San Diego.
- HP-A.5. Designate and preserve significant historical and cultural resources for current and future generations.
- HP-B.1. Foster greater public participation and education in historical and cultural resources.
- HP-B.2. Promote the maintenance, restoration, and rehabilitation of historical resources through a variety of financial and development incentives. Continue to use existing programs and develop new approaches as needed. Encourage continued private ownership and utilization of historic structures through a variety of incentives.
- HP-B.3. Develop a historic preservation sponsorship program.
- HP-B.4. Increase opportunities for cultural heritage tourism.

3. City Commitment to Native American Community

The City Manager has demonstrated a commitment to addressing Native American concerns regarding traditional cultural properties through establishment of a Native American Advisory Committee to solicit input on City projects and private projects involving City-owned land. The formation of the Native American Advisory Committee was approved by the City Council's Transportation and Land Use Committee in July 1990.

In 2015, additional regulations regarding Native American consultation were established under Assembly Bill 52 which introduces the Tribal Cultural Resource (TCR) as a class of cultural resource and additional considerations relating to Native American consultation into CEQA. As a general concept, a TCR is similar to the federally defined TCP; however, it incorporates consideration of local and state significance and required mitigation under CEQA. A TCR may be considered significant if included in a local or state register of historical resources; or determined by the lead agency to be significant pursuant to criteria set forth in PRC §5024.1; or is a geographically defined cultural landscape that meets one or more of these criteria; or is a historical resource as described in PRC §21084.1, a unique archaeological resource as described in PRC §21083.2, or is a non-unique archaeological resource if it conforms with the above criteria.

4. Land Development Code

The purpose and intent of the Historical Resources Regulations of the Land Development Code (Chapter 14, Division 3, Article 2) is to protect, preserve and, where damaged, restore the historical resources of San Diego. The regulations apply to all proposed development within the City of San Diego when historical resources are present on the premises regardless of the requirement to obtain a Neighborhood Development Permit or Site Development Permit. When any portion of a premises contains historical resources, as defined in the Land Development Code Chapter 11, Article 3, Division 1, the regulations apply to the entire premises.

Historical resources consist of designated historical resources, historical districts, historical buildings, structures, objects, and landscapes, important archaeological sites and traditional cultural properties. Only minor alteration of a designated historical resource or of a historical building or structure within a historical district may be allowed if the alteration does not affect the special character or special historical, architectural, archaeological, or cultural value of the resource. Traditional cultural properties are required to be protected and preserved as a condition of development approval. Development within an area containing an important archaeological site is permitted if necessary to achieve a reasonable development area with up to 25 percent encroachment into the site. Additional encroachment of 15 percent is allowed for essential public service projects.

Any loss of a historical resource through alteration or encroachment is required to be offset by mitigation in accordance with Section III of these Guidelines. Mitigation measures include preservation in whole or in part or avoidance as the preferred method of mitigation with other methods such as documentation and/or salvage of the resource prior to its disturbance allowed when preservation is not feasible.

The proposed regulations include a deviation process by which project approval could occur without compliance with the historical resources regulations to afford relief from the regulations when all feasible measures to mitigate for the loss of the resource have been provided by the applicant and when denial of the development would result in economic hardship.

A Construction Permit, Neighborhood Development Permit or Site Development Permit is required for the following types of development proposals:

- a. Process One Construction Permit:
Any development on a parcel that has historical resources on the site that will not adversely affect the historical resources and is consistent with one or more of the exemption criteria in accordance with section 143.0220 of the Land Development Code.
- b. Process Two Neighborhood Development Permit:
Any single dwelling unit residential development on a single dwelling unit lot of any size when a traditional cultural property or important archaeology site is present.
- c. Process Four Site Development Permit:
Any multiple dwelling unit residential, commercial or industrial development on any size lot, or any subdivision on any size lot, or any public works construction project or any project-specific land use plan when a designated historical resource or historical district is present and any development that deviates from the development regulations for historical resources as described in the Land Development Code.

5. City of San Diego Historical Resources Board

The Historical Resources Board is established by the City Council as an advisory board to identify, designate and preserve the historical resources of the City; to review and make a recommendation to the appropriate decision making authority on applications for permits and other matters relating to the demolition, destruction, substantial alteration, removal or relocation of designated historical resources; to establish criteria and provide for a Historical Resources Inventory of properties within the boundaries of the City; and to recommend to the City Council and Planning Commission procedures to facilitate the use of the Historical Resources Inventory results in the City's planning process in accordance with Section 111.0206 of the Land Development Code.

6. Public Resources Code and California Environmental Quality Act

The California Environmental Quality Act (CEQA) states that:

The Legislature further finds and declares that it is the policy of the state to ... preserve for future generations ... examples of the major periods of California history (Section 21001).

CEQA requires that before approving discretionary projects the Lead Agency must identify and examine the significant adverse environmental effects which may result from that project. A project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment (Sections 15064.5(b) and 21084). A substantial adverse change is defined as demolition, destruction, relocation, or alteration activities

which would impair historical significance (Sections 15064.5(b)(1) and 5020.1). Any historical resource listed in or eligible to be listed in the California Register of Historical Resources (CRHR), including archaeological resources, is considered to be historically or culturally significant. Resources which are listed in a local historic register or deemed significant in a historical resource survey as provided under Section 5024.1(g) are presumed historically or culturally significant unless "the preponderance of evidence" demonstrates they are not. Finally, a resource that is not listed in, or determined to be eligible for listing in, the CRHR, not included in a local register of historic resources, or not deemed significant in a historical resource survey may nonetheless be historically significant, pursuant to Section 21084.1.

7. National Historic Preservation Act

Section 106 of the National Historic Preservation Act establishes a consultation process which is intended to accommodate historic preservation concerns with the needs of federal undertakings. The Section 106 process only applies to projects involving federal land, funds or permits. Section 106 of the Act requires a federal agency head with jurisdiction over a federal, federally assisted, or federally licensed undertaking to take into account the effects of the agency's undertaking on properties included in or eligible for the NRHP and, prior to approval of an undertaking, to afford the Advisory Council on Historic Preservation a reasonable opportunity to comment on the project. Consulting parties are the primary participants in the Section 106 process, and may include a federal agency official, the State Historic Preservation Officer, the Advisory Council on Historic Preservation (ACHP) and other interested persons. Interested persons may include local governments, applicants, the Native American community, and the public.

Section 110(f) of the Act requires that federal agency heads, to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to any National Historic Landmark that may be directly and adversely affected by an undertaking and, prior to approval of such undertaking, afford the ACHP a reasonable opportunity to comment.

2.2 How Are Impacts Assessed?

The impact assessment is based on the Area of Potential Effect (APE) which includes the area of both the direct and indirect impacts of a proposed project on a historical resource. The potential for cumulative impacts to historical resources must also be assessed for significance. In order to identify the extent and degree of the impacts, the APE must be established on the proposed project site plan or map. Once the boundaries of the APE have been defined and the resources have been evaluated for significance, the project impacts will be addressed by the City Manager based on the project design. If a historical resource is not significant, both the resource and the effect on it must be noted in the Initial Study or the EIR but will not be considered further in the CEQA process.

1. Direct Impacts

Any part of a development that will have a potential effect on historical resources is considered a direct impact. Direct impacts are generally those that will cause damage to the resource, such as:

- Mass grading;
- Road construction;
- Pipelines for sewer and water;

- Staging areas;
- Access roads;
- Destruction of all or part of a property;
- Deterioration due to neglect;
- Alteration;
- Inappropriate repair;
- New addition;
- Relocation from original site; and
- Isolation of a historic resource from its setting, when the setting contributes to its significance.

2. Indirect Impacts

Indirect impacts are included within the APE. In the built environment, indirect impacts include the introduction of visual, audible or atmospheric effects that are out of character with the historic property or alter its setting, when the setting contributes to the property's significance. Examples include, but are not limited to, the construction of a large-scale building, structure, object, or public works project that has the potential to cast shadow patterns on the historic property, intrude into its viewshed, generate substantial noise, or substantially increase air pollution or wind patterns.

For archaeological resources and traditional cultural properties, indirect impacts are often the result of increased public accessibility to resources not otherwise subject to impacts which may result in an increased potential for vandalism and site destruction. Placing sites into open space does not always mean that there will not be the potential for indirect impacts to the resource. Since open space boundaries can change during the project review as a result of environmental design and/or community constraints, resources placed into open space need to be evaluated for indirect impacts.

3. Cumulative Impacts

Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time. The loss of a historical resource data base due to mitigation by data recovery may be considered a cumulative impact. In the built environment, cumulative impacts most often occur to districts, where several minor changes to contributing properties, their landscaping, or to their setting, over time result in a significant loss of integrity. If it is determined that significant resources will be impacted by the proposed project, there are several mitigation strategies that can be utilized. These are discussed below.

2.3 What Criteria Are Used to Evaluate Significance?

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

1. National Register of Historic Places

The National Register criteria, contained in *National Register Bulletin 16* (U.S. Department of the Interior 1986:1), state that: The quality of significance in American history, architecture, archaeology, engineering and culture is present in districts, sites, buildings, structures and objects that possess integrity of location, design, setting, materials, workmanship, feeling and association, and:

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

Criteria Considerations (Exceptions): Ordinarily cemeteries, birthplaces, or graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings, properties primarily commemorative in nature, and properties that have achieved significance within the past 50 years shall not be considered eligible for the NRHP. However, such properties will qualify if they are integral parts of districts that do meet the criteria or if they fall within the following categories:

- a. A religious property deriving primary significance from architectural or artistic distinction or historical importance; or
- b. A building or structure removed from its original location, but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or
- c. A birthplace or grave of a historical figure of outstanding importance if there is no other appropriate site or building directly associated with his or her productive life; or
- d. A cemetery which derives its primary significance from graves of persons of transcendent importance, from distinctive design features, or from association with historic events; or
- e. A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
- f. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own historical significance; or
- g. A property achieving significance within the past 50 years if it is of exceptional importance.

2. California Environmental Quality Act

For the purposes of CEQA, a significant historical resource is one which qualifies for the CRHR or is listed in a local historic register or deemed significant in a historical resource survey, as provided under Section 5024.1(g) of the Public Resources Code. A resource that is not listed in, or determined to be eligible for listing in, the CRHR, not included in a local register of historic resources, or not deemed significant in a historical resource survey may nonetheless be historically significant for purposes of CEQA.

A resource may be listed in the CRHR if it is significant at the local, state, or national level, under one or more of the following four criteria.

- a) It is associated with events or patterns of events that have made a significant contribution to the broad patterns of local or regional history and cultural heritage of California or the United States.
- b) It is associated with the lives of persons important to the nation or to California's past.
- c) 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.
- d) It has yielded, or has the potential to yield, information important to the prehistory or history of the state or nation.

CEQA Sections 15064.5 and 21083.2(g) defines the criteria for determining the significance of archaeological resources, which are now included in the definition of the term Historical Resources for the purposes of CEQA (Section 21084.1).

3. City of San Diego Progress Guide and General Plan

In 1979, City of San Diego Progress Guide and General Plan (General Plan) was adopted containing a Cultural Resources Management Element. San Diego was one of only a few cities to include a separate element addressing historic preservation at that time. The General Plan identified shortfalls within the existing ordinance and historic preservation program. These shortfalls included the lack of a comprehensive citywide survey of historic and cultural resources, the need for a written historic preservation plan to systematically guide historic preservation efforts, and the need for a stronger organizational framework with adequate personnel to adequately implement management activities in a comprehensive manner. The General Plan further stated as a major goal, the enactment of local regulations that would ensure effective protection and management of historical resources. Significance criteria as outlined in the *Progress Guide and General Plan* reflect a broad definition of historical, architectural and cultural importance; a perspective of local, rather than state or national significance; and the belief that all aspects of history are potentially of equal importance.

In 2008, a new General Plan was adopted to continue to guide the preservation, protection, restoration, and rehabilitation of historical and cultural resources and maintain a sense of the City. And, to improve the quality of the built environment, encourage appreciation for the City's history and culture, maintain the character and identity of communities, and contribute to the City's economic vitality through historic preservation.

4. City of San Diego Historical Resources Register

Any improvement, building, structure, sign, interior element and fixture, feature, site, place, district, area or object may be designated as historic by the City of San Diego Historical Resources Board if it meets any of the following criteria:

1. Exemplifies or reflects special elements of the City's, a community's or a neighborhood's historical, archaeological, cultural, social, economic, political, aesthetic, engineering, landscaping or architectural development;
2. Is identified with persons or events significant in local, state or national history;
3. Embodies distinctive characteristics of a style, type, period or method of construction or is a valuable example of the use of indigenous materials or craftsmanship;
4. Is representative of the notable work of a master builder, designer, architect, engineer, landscape architect, interior designer, artist or craftsman;
5. Is listed or has been determined eligible by National Park Service for listing on the NRHP or is listed or has been determined eligible by the State Historical Preservation Office for listing on the State Register of Historical Resources; or
6. Is a finite group of resources related to one another in a clearly distinguishable way or is a geographically definable area or neighborhood containing improvements which have a special character, historical interest or aesthetic value or which represent one or more architectural periods or styles in the history and development of the City.

5. City of San Diego CEQA Significance

As stated above, if a resource is not listed in, or determined eligible for listing in, the CRHR, not included in a local register, or not deemed significant in a historical resource survey, it may nonetheless be historically significant. If a proposed project has the potential to affect a historical resource, the significance of that resource must be determined. The significance of a historical resource is based on the potential for the resource to address important research questions as documented in a site specific technical report prepared as part of the environmental review process. Research priorities for the prehistoric, ethnohistoric, and historic periods of San Diego history are discussed in Appendix A (San Diego History) to these Guidelines and should be used in the determination of historical significance. As a baseline, the City of San Diego has established the following criteria to be used in the determination of significance under CEQA.

An archaeological site must consist of at least three associated artifacts/ecofacts (within a 50 square meter [m²] area) or a single feature and must be at least 45 years of age. Archaeological sites containing only a surface component are generally considered not significant, unless demonstrated otherwise. Such site types may include isolated finds, bedrock milling stations, sparse lithic scatters, and shellfish processing stations. All other archaeological sites are considered potentially significant. The determination of significance is based on a number of factors specific to a particular site including site size, type and integrity; presence or absence of a subsurface deposit, soil stratigraphy, features,

diagnostics, and datable material; artifact and ecofact density; assemblage complexity; cultural affiliation; association with an important person or event; and ethnic importance.

The determination of significance for historic buildings, structures, objects and landscapes is based on age, location, context, association with an important person or event, uniqueness, and integrity.

A site will be considered to possess ethnic significance if it is associated with a burial or cemetery; religious social or traditional activities of a discrete ethnic population; an important person or event as defined by a discrete ethnic population; or the mythology of a discrete ethnic population.

6. Non-Significant Resource Types

Archaeological sites containing only a surface component are generally considered not significant, unless demonstrated otherwise. (Testing is required to document the absence of a subsurface deposit.) Such sites may include:

- Isolates;
- Sparse Lithic Scatters;
- Isolated Bedrock Milling Stations; and
- Shellfish Processing Stations.

Sparse Lithic Scatters are identified and evaluated based on criteria from the OHP's California Archaeological Resource Identification and Data Acquisition Program: Sparse Lithic Scatters (February 1988). Isolated Bedrock Milling Stations are defined as having no associated site within a 50-meter (m) radius and lacking a subsurface component. Shellfish Processing Stations are defined as containing a minimal amount of lithics and no subsurface deposit.

Historic buildings, structures, objects and landscapes are generally not significant if they are less than 45 years old. A non-significant building or structure located within an historic district is by definition not significant.

Resources found to be non-significant as a result of the survey and assessment, will require no further work beyond documentation of the resources and inclusion in the survey and assessment report.

2.4 What Mitigation Strategies Are Available?

When significant historical resources are present within the APE, mitigation is required prior to project implementation. The preferred alternative for mitigating impacts to historical resources is avoidance or preservation in place. If preservation is demonstrated to be infeasible, then alternative measures would be required.

1. Avoidance/Preservation of Archaeological Sites and Traditional Cultural Properties (preferred)

Areas containing sensitive archaeological and traditional cultural resources which are to be avoided by grading or construction should be identified on grading and building plans. Areas to be preserved should be staked or fenced and protective measures implemented prior to grading. Protective measures should also be identified on grading and building plans.

Preservation can be accomplished in a number of ways including:

- a) Planning construction to avoid significant resources;
- b) Planning parks, green space, or other open space to preserve historical resources;
- c) "Capping" or covering archaeological sites with a layer of soil before building tennis courts, parking lots, or similar facilities. Capping is an acceptable alternative when the following conditions are met:
 1. The soils to be covered will not suffer serious compaction;
 2. The covering materials are not chemically active;
 3. The site is one in which the natural processes of deterioration have effectively ceased; and
 4. The site has been recorded and an index of the contents of the site has been made.
- d) Deeding significant resources into permanent conservation easements.

2. Archaeological Data Recovery Program

When avoidance as a means of mitigation is not feasible, it is necessary to implement a research design and data recovery program. The data recovery program involves the scientific excavation of a representative sample of the features and artifacts contained within that part of the site which will be destroyed by project development. The excavation shall extend to the full depth of the archaeological deposit. The data recovery program should be based on a written research design and is subject to the provisions as outlined in CEQA Section 21083.2. This section provides further guidance for the treatment of unique archaeological resources. The data recovery program must be reviewed and approved by the Director of the City Development Services Department.

The research design should identify important research questions, link research topics to the data already known to be present in the site and explain procedures that will be used in the collection, analysis and curation of recovered materials. The sample size to be excavated will vary with the nature and size of the site.

2.5 Determining the Need for Monitoring

Monitoring may be required when significant resources are known or suspected to be present on a project site but cannot be recovered prior to grading due to obstructions such as, existing

development or dense vegetation. The project archaeologist may suggest or recommend monitoring the site as a result of their own previous research of the surrounding area. Monitoring may also be required to mitigate for potentially significant indirect impacts to an archaeological site. An archaeological monitor is defined as an individual having expertise in the collection and salvage of cultural resources and working under the direction of a qualified archaeologist.

The Applicant shall provide verification that a qualified archaeologist and/or monitor has been retained to implement the monitoring program. All persons involved in archaeological monitoring must be approved by the City's Environmental Analysis Section (EAS) staff prior to the preconstruction meeting. The archaeologist must attend any preconstruction meetings for the purpose of making comments and/or suggestions in regard to the monitoring program. Discussion at this time with the contractors regarding excavation plans may help to avoid any unnecessary complications later in the construction process.

1. Native American Observer

A Native American observer must be retained for all subsurface investigations and disturbances whenever a Native American Traditional Cultural Property or any archaeological site located on City property or within the APE of a City project is the subject of destruction. The observer should be consulted during the preparation of the written report, at which time they may express concerns about the treatment of sensitive resources. If the Native American community requests participation of an observer for subsurface investigations on private property, the request should be honored.

2. Demolition

Monitoring during demolition will be required in order to recover buried archaeological or historic materials known to exist below grade. Demolition would be temporarily halted if the monitor determines that salvage to above ground resources is necessary, and damage to the subsurface deposit may occur.

3. Construction/Grading

When significant resources are known or suspected to be present on a project site, but cannot be recovered prior to grading due to existing development, monitoring of grading activities by a qualified archaeologist is required. The archaeologist would be empowered to temporarily halt or divert grading activities to recover cultural resources. These requirements must be noted on the grading plans. The investigator is also required to prepare a report on the results of the monitoring activities.

2.6 Discovering Unexpected Historical Resources During Construction

1. Cessation of Work

If previously unknown historical resources are discovered during construction, the archaeological monitor shall have the authority to divert or temporarily halt ground disturbance operations in the immediate area of the discovery until the project analyst from EAS has been notified.

2. Evaluation of Resource

Once notified, EAS staff will, in consultation with the archaeologist, take responsibility for meeting the requirements of CEQA and other state statutes concerning the discovery of human remains and other previously unknown resources. Evaluation of the resource will be necessary and EAS must concur with the evaluation procedures before construction activities may continue on other portions of the project.

Burials need not be evaluated further, as they are always significant and must be treated accordingly. State law must be followed if burials are encountered during construction. In addition, CEQA Section 15064.5 provides guidance to the Lead Agency, as well as to the consultant, for the evaluation of unexpected discoveries during construction.

3. Research Design and Data Recovery

For significant historical resources that are discovered during construction, a Research Design and Data Recovery Program shall be prepared and carried out in order to mitigate project impacts. All collected cultural remains shall be cleaned, catalogued, and permanently curated with an appropriate institution. Artifacts shall be analyzed to identify function and chronology as they relate to the history of the area. Faunal material shall be identified as to species, and specialty studies shall be completed as appropriate. In addition, any sites or features encountered as a result of the above program, must be recorded on the appropriate site forms and submitted to the SCIC and the San Diego Museum of Man.

3.0 PREVIOUSLY RECORDED RESOURCES INTERSECTING THE RIVERWALK PROJECT BOUNDARY

The Class III inventory conducted by Spindrift for the proposed Project identified 12 previously recorded cultural resources that are within or intersect the Project APE (Confidential Figure 1). This section provides a chronological summary of the archaeological investigations conducted at each site locations. The sites are grouped by their status of recommended eligibility for the California Register of Historical Resources (CRHR) or National Register of Historic Places (NRHP). Four of the 12 cultural resources intersecting the Project boundaries have been tested, evaluated, and recommended eligible for listing in the NRHP and/or the CRHR. Six of the sites were evaluated and determined not significant under CEQA criteria. One site has not yet been evaluated, but it is in a portion of the Project area that will not be impacted. One resource is an isolate find that was collected and no further work is necessary.

Some of the information presented here is redundant to information presented in the Spindrift report. However, the Spindrift report did not indicate that four of the 12 previously identified sites (SDI-12128, SDI-12132, SDI-12220, and SDI-12220) within the Project area were evaluated and determined not to meet the criteria for listing in the CRHR. In addition, an evaluation report by Gallegos and Associates (Kyle and Gallegos 1995) for the evaluation of seven sites within a similar Project footprint as the current Project was omitted in the Spindrift report. The information from that report is included in the summaries presented below.

Significant Resources

SDI-11767

Malcolm Rogers recorded SDI-11767 as a habitation site with evidence of San Dieguito, La Jollan, and predominantly Late Period prehistoric occupation (Rogers n.d.). Cultural materials identified by Rogers include cobble hearths, a steatite tube, and midden deposits up to 3 feet (ft.) deep with shell most abundant on the west end of the site. Rogers noted long plowing, grading, and erosion as impacts affecting the site.

Kaldenberg (1975) tested an area southwest of SDI-11767 and did not locate any prehistoric archaeological material. Based on available records, the site was not revisited again until 1990 when ERCE Environmental and Energy Services, Inc. (ERCE) relocated the site during a survey for the Mission Valley Water Reclamation Project (Carrico et al. 1990). The only cultural material they identified was a concentration of shell. ERCE did recommend a testing program to determine site significance.

ERCE tested the site for significance under CEQA criteria in 1991 for the Mission Valley West LRT Project (Pigniolo and Huey 1991). The testing program included the excavation of 29 shovel test pits (STPs) and two 1-x-1-m test units. The distribution of the subsurface archaeological deposit was determined to be approximately 134 m north-south by 311 m east-west. The artifact assemblage recovered included four flaked tools, one utilized flake, one core tool, five cores, one hammerstone fragment, 12 handstone fragments, two millstone fragments, two beads, one potsherd, 392 pieces of debitage, 752 pieces of shatter, 11 otoliths, 14,7189.9 grams (g) of shell, 181.4 g of faunal bone, 3.2 g of charcoal, 29.7 g of historic materials, and 24,591.1 g of fire-affected rock (FAR). A possible hearth was also identified in one of the test units. A sample of shell from the site returned a radiocarbon date of 2,070 ±80 years before present (B.P.). Pigniolo and Huey (1991:5-33 – 5-35) suggest that the site represents a large habitation area occupied during the transition between the Early and Late Periods where food preparation activities and consumption of plants, mammals, fish, and shellfish took place along with secondary tool reduction and finishing. They remark that disturbance to the site was limited to the upper 10 cm of deposit except in areas of utilities. Pigniolo and Huey (1991:6-2) conclude that SDI-11767 qualifies as significant pursuant to CEQA criteria and is thus eligible for listing in the CRHR.

Gallegos and Associates (Gallegos) revisited the site in 1992 for the Chevron Riverwalk Project and identified the site as a prehistoric artifact and shell scatter consisting of flakes, angular waste fragments, one scraper, one sherd, and *Chione* and *Argopecten* shell fragments (Gallegos and Huey 1992). They noted disturbance to the site from the construction of the golf course.

Ogden Environmental and Energy Services Co., Inc. (Ogden) conducted a second evaluation effort at SDI-11767 for the North Mission Valley Interceptor Sewer Phase II Project to determine site significance under criteria for the NHPA and CEQA (Pigniolo 1994). The evaluation was conducted during the months of November and December 1993 and January 1994 and consisted of the excavation of 10 STPs and 10 test units. The portion of the site on the terrace was found to have a denser concentration of cultural material than the alluvial plain below where the deposits appeared to be recently deposited secondary material. The artifact assemblage recovered included

five cores, six core tools, eight utilized flakes, four retouched flakes, eight hammerstones, seven handstones, 10 millingstone fragments, one potsherd, one modified bone, four shell beads, one piece of ochre, one piece of daub, 675 flakes, 362 pieces of angular waste, six otoliths, 442 g of faunal bone, 21,859.8 g of shell, 0.1 g of charcoal, 131,576.5 g of FAR, and 158.7 g of historic artifacts. A sample of *Chione* shell was radiocarbon dated and returned a calibrated date of 2140 ±60 cal. B.P. Based on the analysis of the artifact assemblage and context in which it was found, Pignoli (1994) concludes that SDI-11767 contains important information that can be used to address significant regional research topics and thus qualifies as eligible for listing in the NRHP under Criterion D and is significant pursuant to CEQA criteria.

Gallegos conducted an additional testing program at the site between the months of December 1994 and May 1995 for the Stardust Golf Course Realignment Project (Kyle and Gallegos 1995). The additional testing was conducted in an effort delineate the western and northern boundaries of SDI-11767 and SDI-12220. The testing effort for these two sites consisted of the excavation of 22 STPs and 10 1-x-1-m test units. The STPs and test units were excavated within, north of, and between the boundaries originally defined for SDI-11767 and SDI-12220. The archaeological deposit associated with these sites reached a maximum depth of 110 cm. The artifact assemblage recovered included 289 flakes, 209 angular waste fragments, three biface fragments, three bone tools, one core fragment, one core tool, one hammerstone, one hammerstone fragment, one chopper, three modified flakes, two handstones, five handstone fragments, one millingstone fragment, one otolith, 368.5 g of bone, 201.5 g of saw-cut bone, 7,814.4 g of shell, charcoal, FAR, and non-diagnostic and recent historic debris.

Kyle and Gallegos (1995:3-27) suggest the results of their testing program for SDI-11767 along with SDI-11766/H, SDI-12128, and SDI-12220 indicate that these sites are all portions of a single large habitation site situated on a low terrace above the San Diego River Valley floodplain. They suggest that the small gully previously identified by Pignoli (1994) as the boundary between SDI-11767 and SDI-12220 may be a manufactured drainage for the golf course and does not appear to divide the deposit. Kyle and Gallegos (1995:4-35) subsumed SDI-11766/H, SDI-11767 Loci 1 and 2, SDI-12128, and SDI-12220 under the single trinomial of SDI-11767. The redefined site boundary was not on file in the SCIC's geodatabase of cultural resources nor was the confidential appendices for the report available on file at the SCIC.¹ However, topographic maps from the evaluation work conducted by Ogden Environmental and Gallegos and Associates in the mid-90s available in the archaeological data recovery report on the Mission Valley West LRT Project provide information on the extent of subsurface cultural deposits associated with these sites, the excavations conducted by both Gallegos and Ogden, and portions of the site and loci boundaries as redefined by Gallegos (Cooley and Mitchell 1996). ASM used the maps in the Ogden report (Cooley and Mitchell 1996, Figures 4-1 and 5-1) to digitize the locations of previous excavations conducted at SDI-11767 and SDI-12220 by both Gallegos and Ogden and the boundaries, as defined by Gallegos, for SDI-11767 Loci 1 and 2 (Revised Confidential Figure 2). These boundaries have now been submitted to the SCIC.

¹ ASM contacted Dennis Gallegos and left him a voicemail to obtain the confidential appendices for the 1995 report by Kyle and Gallegos. Mr. Gallegos is in the process of searching his archives for the requested maps and confidential appendices.

Kyle and Gallegos (1995) suggest that SDI-11767 Loci 1 and 2 may have been associated with the prehistoric village of Cosoy. According to Kyle and Gallegos (1995), Locus 1 corresponds roughly to the previous boundary of SDI-11767 and Locus 2 corresponds roughly to the previous boundary of SDI-12220. They recommend that these two loci are the only portions of the site that are significant and that the portions of the site outside the boundaries of Loci 1 and 2 are not significant. The mitigation recommendations they provided included capping, avoidance of excavation in sensitive archaeological areas, not removing tree roots within sensitive archaeological areas, and placement of utility and irrigation lines outside of sensitive archaeological areas or within fill capping.

In 1995, Ogden conducted limited data recovery at SDI-11767 for the Mission Valley West LRT Project as part of compliance under Section 106 of the NHPA, for the issuance of a 404 permit (No. 94-20625) by the Army Corps of Engineers (Cooley and Mitchell 1996). The results of the study were published in *Proceedings of the Society for California Archaeology* (Cooley 2011). The data recovery program included the excavation of 11 1-x-1-m units or 23.5 m² (a total of 12.97 cubic meters of soil). A flexed burial was encountered during the data recovery program. The burial was found in association with a rock feature (Feature A) and 47 shell beads and 15 stone beads. The artifact assemblage recovered from the site included six cores, 22 scraper planes, 16 chopping tools, 25 hammerstones, 11 scrapers, two biface fragments, 33 worked/retouched flake scrapers, 17 utilized flakes or chunks, 1,877 pieces of chipped stone tool working debitage, one millingstone fragment, 16 handstone and handstone fragments, one rubbing stone, one possible pestle, 15 stone beads, seven bone tool fragments, 52 whole shell beads and bead fragments, 45,621.6 g of shell, 4,380 bone fragments and six otoliths (weighing approximately 1,070 g), and over 1,004 kg of FAR.

Based on five radiocarbon dates, Cooley and Mitchell (1996:ii) suggest that the site was occupied between 180 B.C. and A.D. 505. They argue the site provides an important comparative example of late La Jolla complex occupation with some possible indication of a limited early Yuman occupation. The data recovery was to mitigate the impacts of the Mission Valley West LRT Project and was only conducted within the project corridor. While they suggest that the data recovery mitigated the potential impacts within the right of way (ROW) for the LRT, they recommended capping of the site. The human bone and associated grave goods recovered during the data recovery were reburied, on-site, on October 5, 1995, following analysis, according to the Pre-excavation Agreement for the project entered between MTDB and the Most Likely Descended Native American Parties of Interest (likely descendants) representative, Fern Southcott.

Regional Environmental Consultants (RECON) conducted archaeological monitoring for the reconstruction of the Stardust Golf Course Project between November 27, 1996 and July 11, 1997 (Gilmer and Cheever 1997). They monitored the removal of vegetation, scraping of sod, and tree removal within the boundaries of SDI-11767. The site was then covered with protective sheeting and capped with 12 inches (in.) of fill.

The site was revisited by ASM Affiliates (ASM) in 2012 in conjunction with a survey of an existing power line for San Diego Gas and Electric. The site was noted to have been capped during previous construction of a nearby housing project. There was no evidence of cultural materials on

the surface. Only a small portion of the site was surveyed for the ASM project (northern half of the site), and it was noted that cultural materials may still be present on the southern half of the site.

SDI-12126

Site SDI-12126 was originally recorded during a survey for the Stardust Golf Course for the Chevron Land development project in 1992 (Gallegos and Huey 1992) as a small shell scatter. The site is approximately 29,237 m² in size. The site was then evaluated for two separate projects in 1995 by Gallegos, the Stardust Golf Course Realignment (Kyle and Gallegos 1995a) and the North Valley Interceptor Sewer Phase II (NMVIS II) (Kyle and Gallegos 1995b). The two testing programs included the excavation of 12 mechanical soil borings, 61 STPs, and 10 1-x-1-m test units. The results of the testing program revealed a rich cultural deposit up to a depth of 160 cm below surface (cmbs) with a small amount of shell up to 210 cmbs. The artifact assemblage recovered consisted of 181 flakes including one obsidian flake, 152 angular waste fragments, four biface fragments, one core fragment, one flake tool, one modified hammerstone fragment, 133 potsherds, 10 handstone fragments, one non-diagnostic ground stone fragment, five bone tools, one shell tool, four *Olivella* sp. spire-lopped shell beads, one schist fragment, three otoliths, 3.6 g of burned cranium fragments, 612 g of bone, 2.2 g of saw-cut bone, 75,191.3 g of shell, ochre, charcoal, FAR, and historic debris. Four radiocarbon dates from shell samples place the occupation of the site in the transition period (ca. 1,000 years ago) between the Early and Late Periods.

Based on the results of the evaluation efforts, Kyle and Gallegos (1995b) argue that the wide range of cultural material recovered from the site provides an excellent database to answer important research questions regarding prehistoric occupation of the San Diego River Valley and that sites SDI-11767 and SDI-12126 may be remnants of the ethnographically documented prehistoric Village of Cosoy. They recommend the site significant pursuant CEQA.

The impacts of the NMVIS II alignment were mitigated by tunneling underneath the site for a length of 82 m. RECON monitored the pipe trenching associated with the NMVIS II project and during the monitoring for Station 21+28.14, a human cremation with associated grave goods was encountered approximately 1,000 ft. west of SDI-12126 (Gilmer and Cheever 1996). During the tunneling beneath the site for the NMVIS II alignment, a pocket of shell was encountered. A sample of the shell was submitted for radiocarbon dating, and the analysis returned a conventional date of 2510 ±70 B.P.

RECON also monitored the realignment of the Stardust Golf Course (Gilmer and Cheever 1997). During the monitoring effort, they observed the removal of 10 trees within or bordering SDI-12126. No cultural material was observed except for a small amount of shell. After vegetation removal, the site was covered with plastic sheeting and capped with 12 in. of fill.

SDI-12220

Site SDI-12220 was originally recorded by ERCE in 1991 as a temporary camp with shellfish remains, cobble lithics, and FAR (ERCE 1991). The site was recorded as containing more than 150 fragments of *Argopecten*, *Chione*, and *Ostrea* shell along with four fragments of lithic debitage

and three pieces of FAR. The site was again relocated by Gallegos and Huey (1992) and found to be in similar condition as reported by ERCE.

Ogden tested the site for the NMVIS II project (Pigniolo 1994). The testing program consisted of 10 STPs and four 1-x-1-m test units. Artifacts were recovered from depths up to 90 cmbs. The artifact assemblage included 141 flakes, 135 angular waste fragments, five cores, one hammerstone, two utilized flakes, one test core, one hammerstone/core, two utilized flakes, two flake tools, five handstone fragments, three modified bone fragments, 83.3 g of bone, 2,767.5 g of shell, charcoal, FAR, and historic debris. The testing effort identified intact cultural deposits dating to 1750 ±70 B.P. with varying density of cultural material within the site as seen at SDI-11767. The study did not define the northern and eastern boundaries of the site and identified a small gully east of the site as a separation from SDI-11767. The western and southern boundaries of the site correspond to the terrace edges. Pigniolo (1994) recommended the site as eligible for the NRHP under Criterion D and significant under CEQA criteria.

Gallegos conducted an additional testing program at the site between the months of December 1994 and May 1995 for the Stardust Golf Course Realignment Project (Kyle and Gallegos 1995). The additional testing was conducted in an effort delineate the western and northern boundaries of SDI-11767 and SDI-12220. Based on the results of the testing effort, Kyle and Gallegos (1995) expanded the site boundary for SDI-11767 to include SDI-12220 along with SDI-11766/H and SDI-12128. However, SDI-12220 would be considered the only important and contributing element to the significance of the site under CEQA criteria.

RECON indicated that the site was covered with fill and rip-rap before the construction of the Stardust Golf Course Project began and no construction grading was undertaken in native soil (Gilmer and Cheever 1997). RECON conducted archaeological monitoring at the site for the reconstruction of the golf course (Gilmer and Cheever 1997) and the NMVIS II (Gilmer and Cheever 1996).

Non-Significant Resources

SDI-11722/H

Site SDI-11722/H was first recorded by ERCE in 1990 as a prehistoric temporary camp and historic refuse scatter (Carrico et al. 1990). It was identified on a small significant knoll on the southern side of Friars Road near the intersection of Friars Road and Goshen Street. The prehistoric artifacts identified during the initial recordation included two quartzite flakes, one metavolcanic flake, and one possible hearth. The historic artifacts included two historic/modern trash pits with numerous bottles from the 1940s, glass fragments, ceramics, cans, and wood and metal fragments.

The site was tested by ERCE in September and October of 1991 to determine significance under CEQA for the Mission Valley West LRT Project (Pigniolo and Huey 1991). Testing of the site included the excavation of one 1-x-1-m test unit and eight STPs. The excavations yielded a total of 17 flakes, 29 angular waste fragments, two shell buttons, 39.6 g of shell, 3,332.7 g of faunal remains, 0.9 g of seeds, 29.0 g of charcoal, 1,769.8 g of historic material, and 2,663.4 g of FAR.

Pigniolo and Huey (1991) suggest that the prehistoric cultural material recovered from SDI-11722/H indicate the site was a prehistoric temporary camp. No flaked lithic or ground stone tools were recovered from the site nor any chronological diagnostic cultural material. The historic artifacts recovered included kitchen items, pieces of furniture, garment items, building materials, munitions and arms, etc. Examination of the historic diagnostic artifacts revealed that the materials were deposited between approximately 1945 and 1954. Both the prehistoric and historic components of the site were recommended not significant pursuant to CEQA criteria.

Gallegos and Associates revisited the site in 1992 for the Chevron Riverwalk Project. They were able to relocate the site and identified it as a multi-component site consisting of prehistoric lithic debitage and historic refuse in a 45-x-22-m area.

During monitoring for the reconstruction of the Stardust Golf Course Project, an archaeological monitor from RECON recovered a few whole bottles and other broken bottle fragments after a grading operator exposed portions of the site (Gilmer and Cheever 1997). The whole glass bottles recovered indicate a post-1920s deposition. Pieces of metal, springs, and other glass fragments were also noted but not collected. No prehistoric artifacts were identified. Gilmer and Cheever (1997:30) also note that part of the site was destroyed by the construction of Friars Road.

The site was revisited by Spindrift for the current Project in 2017 and identified some shell, saw-cut bone, and historic glass fragments.

SDI-11766/H

ERCE recorded SDI-11766/H in 1990 as a multi-component site consisting of a lithic and shell scatter with a minor historic component (Carrico et al. 1990). The shell noted on the surface consisted of *Argopecten*, *Chione*, and *Ostrea*. One flaked tool and six pieces of debitage were recorded as well. The historic artifacts included patinated clear glass and whiteware ceramics.

The site was tested by ERCE in 1991 for the Mission Valley West LRT Project (Pigniolo and Huey 1991). The site was tested with a total of five STPs. The excavations revealed that the site was highly disturbed and represents a minimal shell and lithic scatter. The site was recommended not eligible for listing in the CRHR. The site record was updated in 1992 by Gallegos as only a prehistoric lithic and shell scatter (Gallegos and Huey 1992). Gallegos made no mention of the historic refuse but noted that the golf course construction likely disturbed the site. In 1997, RECON noted that no cultural material was observed in the site area during the Stardust Golf Course Realignment Project (Gilmer and Cheever 1997).

SDI-12127

Gallegos first recorded SDI-12127 the survey of the Stardust Golf Course for the Chevron Riverwalk project (Gallegos and Huey 1992). This site was recorded as a shell scatter approximately 15 x 45 m in size. The site was located 300 m north of the San Diego River and 60 m southwest of SDI-12220. The shell noted on the surface was predominately *Chione* sp. and *Argopecten* sp.

Ogden evaluated the site for the NMVIS II Project and determined that the site represents secondary alluvial deposits of cultural material probably deriving from SDI-12220 (Pigniolo 1994). The site was recommended ineligible for listing in the NRHP and as not significant pursuant to CEQA.

The site was covered with fill and rip-rap before the reconstruction of the Stardust Golf Course began (Gilmore and Cheever 1997).

SDI-12128

Gallegos first identified SDI-12128 in 1992 during the survey of the Stardust Golf Course for the Chevron Riverwalk project (Gallegos and Huey 1992). The site was identified near the southern edge of SDI-11767 and was reported to be a shell scatter.

Gallegos conducted archaeological testing of seven sites for the Stardust Golf Course Realignment Project between the months of December 1994 and May 1995 (Kyle and Gallegos 1995). As a result of the study, the site boundary for SDI-11767 was expanded to include SDI-12128 along with SDI-11766/H and SDI-12220. However, SDI-12128 and SDI-11766/H were outside of the two loci identified as a significant cultural resource and were not contributing elements to the site's significance. Based on the language in the 1995 report by Kyle and Gallegos, site SDI-12128 is not a significant resource.

Gilmer and Cheever (1997) note that prior to the reconstruction of the Stardust Golf Course, a protective fabric and fill soil were used to cap the site prior to grading and no impacts occurred during the construction.

SDI-12129

Gallegos first identified SDI-12129 in 1992 during the survey of the Stardust Golf Course for the Chevron Riverwalk project (Gallegos and Huey 1992). The site was recorded as a small shell scatter approximately 15 m north-south by 15 m east-west.

The site was evaluated by Gallegos for the Stardust Golf Course Realignment Project (Kyle and Gallegos 1995). The site was determined to be a redeposited shell scatter and was identified as not significant under City of San Diego and CEQA criteria.

During monitoring for the Stardust Golf Course Realignment Project, RECON noted that there was no observable indication of the site (Gilmer and Cheever 1997).

SDI-12132

Site SDI-12132 was first recorded by Gallegos as a 5,625 m² lithic and shell scatter located in the southeastern portion of the golf course (Gallegos and Huey 1992). Gallegos tested the site for the Stardust Golf Course Realignment Project with the excavation of 12 STPs and four 1-x-1-m test units. The artifact assemblage included 13 flakes, three angular waste fragments, one modified flake, 23.9 g of bone, 162.9 g of shell, charcoal, FAR, and historic debris (Kyle and Gallegos 1995). The site was identified as not significant under City of San Diego and CEQA guidelines.

In 1997, Gilmer and Cheever noted that no indications of this site were observed during walkovers or monitoring for the Stardust Golf Course Realignment Project. They stated that the area was carefully watched because Lake 3 was planned to take up much of the old driving range where the site was supposedly located, and no shell or artifacts were observed.

SDI-12862

Gallegos first recorded SDI-12862 during the Chevron Riverwalk survey as a small prehistoric shell scatter with no associated artifacts within a 15-x-30-m area (Gallegos and Huey 1992). Gallegos evaluated the site for the Stardust Golf Course Realignment Project with the excavation of 13 STPs and two 1-x-1-m units. The results of the evaluation indicated that the site consisted of redeposited cultural material moved to the location during excavation and removal of an oil tank approximately 10 years prior to the study (Kyle and Gallegos 1995). All cultural material was recovered from alluvial soil to approximately 80 cm over intact clayey loam with no cultural material present; non-diagnostic historic debris was also present to 80 cm and recent historic debris to 50 cm. Site SDI-12862 is identified as not significant under the City of San Diego or CEQA criteria. Since its research potential has been exhausted, no further work was recommended.

During archaeological monitoring for the Stardust Golf Course Realignment Project, RECON did not observe any cultural materials associated with SDI-12862 (Gilmer and Cheever 1997).

P-37-014963

P-37-014963 was recorded by ERCE in 1990 as an isolated quartzite flake tool, and under “Remarks” in the site record, it was noted that the artifact was collected at the time of recordation. Isolates are not significant historical resources.

Unevaluated Resources

SDI-4675

Site SDI-4675 was first recorded by James Moriarty in 1976 as a possible prehistoric lithic scatter. Paul and Greta Ezell (1977) conducted historical research to determine the location of the ethnohistoric Village of Cosoy and identified SDI-4675 as the Charles R. Brown site. Additional work is likely to have been conducted at this site, but no records were returned in the SCIC records search. Only a small portion of the site boundary intersects the southwestern corner of the Project area, and no ground improvements are to be made in that area.

4.0 FINDINGS AND CONCLUSIONS

This section provides a discussion of the potential impacts to the cultural resources within the Riverwalk Project APE and potential mitigation measures to reduce those impacts to a level of less than significant.

4.1 Impacts Discussion

A minimum depth of 5 ft. of soils will be affected during remedial grading for of the proposed Riverwalk Development Project APE (Figure 3). Sites SDI-11767 and SDI-12220 have been evaluated and recommended eligible for listing in the NRHP and the CRHR. These sites are in an area that will require remedial grading that will impact a minimum of 5 ft. of soils. Site SDI-11767 is predominately covered by approximately 2 to 4 ft. of fill based on a historic cut/fill map for the realignment of the Stardust Golf Course (Figure 4). Site SDI-12126 was evaluated and identified as a significant resource and recommended eligible for listing in the CRHR. This site is located directly within the footprint of a proposed building in an area that requires no less than 10 ft. of ground improvement below removal bottom within that footprint (Figure 5). The artificial fill that may be present on the site ranges from less than 1 ft. to just over 9 ft.

Sites SDI-11722/H, SDI-11766/H, SDI-12128, SDI-12132, and SDI-12862 have all been evaluated and identified as not significant pursuant to City of San Diego and CEQA guidelines. However, they are still within the project APE and intersect proposed building footprints. These sites will likely be directly impacted during remedial grading.

Sites SDI-4675, SDI-12127, and SDI-12129 are in areas designated as open space and will not likely be impacted by the proposed Project. SDI-4675 has not yet been evaluated. SDI-12127 and SDI-12129 have been evaluated and have been identified as not significant.

4.2 Mitigation Measures

Avoidance for the three significant resources identified within the Project APE is the preferred method of mitigation. However, the project area is planned to be rough graded to accommodate future mixed-use development. The grading for the residential, retail and commercial developments will need to provide structural fills per City, County, and State Building and Grading Codes. In the northern area, remedial removals will be completed down to competent earth materials prior to placement of compacted fill. Additionally, many of the building areas will also require ground improvements at depth into the underlying saturated alluvium to mitigate secondary seismic hazards and potential settlements. This work will include excavation down to near the groundwater table, installation of rammed aggregate piers at the removal bottom, and then backfill to finish grades for the proposed structures. Thus, an archaeological monitoring and data recovery plan is recommended for SDI-11767, SDI-12220, and SDI-12126 and archaeological monitoring is recommended for the remainder of the archaeological sites. Given that the significant sites have been capped by artificial fill, an archaeological and Native American monitor should be present during all remedial grading. Once the artificial fill is removed from these site locations, a data recovery program should be conducted at sites SDI-11767, SDI-12220, and SDI-12126 to mitigate the potential impacts to the sites during further grading to a level of less than significant. In the case of SDI-11767, the data recovery program will focus only on those areas outside of the Mission Valley West LRT corridor that were subjected to a data recovery in 1996 by Ogden.

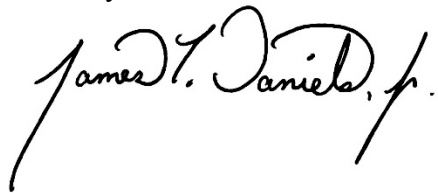
Monitoring for the remainder of the Project APE is also recommended due to the sensitive nature of the area and the potential for the presence of human remains.

4.3 Conclusions

The proposed project has the potential to cause a direct impact to three sites that have been identified as significant historical resources pursuant to NHPA/CEQA, SDI-11767, SDI-12126, and SDI-12220. These archaeological resources and their associated deposits may be larger than indicated by their site boundaries as provided by the SCIC and have the potential for sensitive archaeological deposits below the artificial fill. As such, archaeological monitoring is recommended for all ground disturbing activities within the Project APE. In the areas of the three known eligible resources, remedial grading should be monitored and then temporarily halted once the artificial fill is removed in order to conduct data recovery to mitigate significant impacts to the sites. Table 1 provides a summary of the information regarding the sites presented in this report and the recommended mitigation measures for each site.

If there are any questions regarding the additional site information provided in this addendum to the Class III inventory report by Spindrift or the above-mentioned mitigation recommendations, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "James T. Daniels, Jr." with a stylized flourish at the end.

James T. Daniels, Jr., M.A., RPA
Senior Archaeologist

Attachments: Confidential Figures 1-5

Table 1. Summary of sites and mitigation recommendations.

Site	Site Type	Area (m2) Intersecting Project Area	Evaluation Status	Relocated by Spindrift	Estimated Depth of Fill or Depth of Cut Based on Stardust Historic Cut-Fill Map	Ground Improvement Suggested by Geotech Plate 4	Recommendation	Summation
P-37-014963	Isolate quartzite flake tool (collected)	0	Isolates are not considered significant under CEQA	Not relocated	Unknown	A minimum of 5' of remedial grading.	Isolates are automatically ineligible for NRHP. No further work needed.	No further work
SDI-4675	Lithic scatter	381.9	Unevaluated	Not relocated	Unknown	None noted, no remedial grading.	Site will likely not be impacted, no further work recommended.	No further work
SDI-11722/H	Prehistoric temporary camp and historic trash scatter	2,110.9	Tested, not significant under CEQA (Pignuolo and Huey 1991)	Relocated	-9.8 to .23	Ground improvement needed 10' below removal bottom within building footprint and 5' outside footprint.	As the site has previously been evaluated and recommended not eligible, no additional evaluation effort is recommended, but archaeological monitoring is recommended during all ground disturbance activities in the event that unanticipated and potentially significant subsurface cultural deposits are encountered.	Monitoring
SDI-11766/H	Lithic and shell scatter and historic refuse scatter	2,162.2	Tested, not significant under CEQA (Pignuolo and Huey 1991)	Relocated	-0.11 to 3.7	A minimum of 5' of remedial grading.	As the site has previously been evaluated and recommended not eligible, no additional evaluation effort is recommended, but archaeological monitoring is recommended during all ground disturbance activities in the event that unanticipated and potentially significant subsurface cultural deposits are encountered.	Monitoring
SDI-12127	Shell scatter	1,394.5	Tested, not significant under CEQA (Pignuolo and Huey 1994)	Not relocated	-1.87 to 5.54	A minimum of 5' of remedial grading.	Site was capped with fill and rip-rap. As the site has previously been evaluated and recommended not eligible, no additional evaluation effort is recommended, but archaeological monitoring is recommended during all ground disturbance activities in the event that unanticipated and potentially significant subsurface cultural deposits are encountered.	Monitoring
SDI-12128	Shell midden	3,655	Tested as part of SDI-11767, not a contributing element to the significance of SDI-11767 under CEQA (Kyle and Gallegos 1995)	Not relocated	1.6 to 15	Ground improvement needed 20' below removal bottom within building footprint and 5' outside footprint or as shown; design fill slope next to river that will need deeper ground improvement to mitigate potential lateral spread.	Site was evaluated in conjunction with SDI-11767. Site was capped and filled during construction of the golf course and may be under 4' of fill. Much of the site is now covered by a building and parking lot. Monitoring is recommended during all ground disturbance activities in the event that unanticipated and potentially significant subsurface cultural deposits are encountered.	Monitoring
SDI-12129	Shell scatter	312.2	Tested, not significant under CEQA (Kyle and Gallegos 1995)	Not relocated	-4.3 to .60	None noted, no remedial grading. 7' of fill proposed during construction grading	Site was tested by Gallegos and Associates and identified as not significant under City of San Diego guidelines and CEQA criteria. Monitoring is recommended during all ground disturbance activities in the event that unanticipated and potentially significant subsurface cultural deposits are encountered.	Monitoring
SDI-12132	Shell scatter	5,413.7	Tested, not significant under CEQA (Kyle and Gallegos 1995)	Not relocated	-1.58 to 10.43	Ground improvement needed 15' below removal bottom within building footprint and 5' outside footprint or as shown.	Site was tested by Gallegos and Associates and identified as not significant under City of San Diego guidelines and CEQA criteria. Site may be under at least 4' of fill. Portions of site are now within water trap pond. Monitoring is recommended during all ground disturbance activities in the event that unanticipated and potentially significant subsurface cultural deposits are encountered.	Monitoring

Site	Site Type	Area (m2) Intersecting Project Area	Evaluation Status	Relocated by Spindrift	Estimated Depth of Fill or Depth of Cut Based on Stardust Historic Cut-Fill Map	Ground Improvement Suggested by Geotech Plate 4	Recommendation	Summation
SDI-12862	Shell scatter	1,670.6	Tested, not significant under CEQA (Kyle and Gallegos 1995)	Relocated	-5.07 to 2.71	A minimum of 5' of remedial grading.	Site was tested by Gallegos and Associates and identified as a redeposited shell scatter moved to this location during excavation and removal of an oil tank approximately 10 years prior. The cultural material was recovered from alluvial fill soil to approximately 90 cm over intact clayey [sterile] loam and was determined not significant. Monitoring is recommended during all ground disturbance activities in the event that unanticipated and potentially significant subsurface cultural deposits are encountered.	Monitoring
SDI-11767	Habitation site with burials	55,251.6	Evaluated, recommended eligible for NRHP and considered significant under CEQA (Kyle and Gallegos 1995; Pignolo 1994; Pignolo and Huey 1991); data recovery conducted (Kyle and Gallegos 1995)	Relocated	-1.61 to 11 (mostly between 2 to 4' of fill)	A minimum of 5' of remedial grading; southeasternmost portion is within area designated as ground improvement needed 25' below removal bottom or foundation.	Site was covered with at least 1' of fill. Site has been evaluated and recommended eligible. A data recovery was conducted for mitigation during the construction of the golf course. No additional data recovery is recommended, but archaeological monitoring is recommended during all ground disturbance. Additional data recovery necessary should significant cultural deposits be exposed.	Monitoring of remedial grading of fill. Data recovery of areas not previously subjected to data recovery prior to grading beneath fill.
SDI-12220	Habitation site or temporary camp (1991); downgraded to shell scatter (1992)	312.3	Evaluated, recommended eligible for NRHP and considered significant under CEQA (Kyle and Gallegos 1995; Pignolo 1994; Pignolo and Huey 1991)	Relocated	7.99 to 9.4	A minimum of 5' of remedial grading.	Site was capped with fill and rip-rap. Site has been evaluated. Monitoring is recommended for the remedial grading for the removal of artificial fill. Data recovery of the site is recommended prior to grading below fill.	Monitoring of remedial grading of fill. Data recovery prior to grading beneath fill.
SDI-12126	Shell scatter	3,173.1	Tested, considered significant under CEQA (Kyle and Gallegos 1995)	Relocated	-.60 to 9.34	Ground improvement needed 10' below removal bottom within building footprint and 5' outside footprint.	Site has been evaluated and recommended eligible. Site may be under at least 4' of fill. Monitoring is recommended for the remedial grading for the removal of artificial fill. Data recovery is recommended for site area prior to grading below fill.	Monitoring of remedial grading of fill. Data recovery prior to grading beneath fill.

REFERENCES

- Carrico, Richard L., Joyce Clevenger, Anne Cooper, and Dennis Gallegos
1990 *Historic Properties Inventory Report for the Mission Valley Water Reclamation Project, San Diego, California*. ERCE Environmental and Energy Services, Inc. Ms. on file at the South Coastal Information Center, San Diego State University.
- Cooley, Theodore
2011 Observations on Settlement and Subsistence during the Late La Jolla Complex – Preceramic Interface as Evidenced at Site CA-SDI-11,767, Lower San Diego Valley, San Diego County, California. In *Proceedings of the Society for California Archaeology* 11:1-6. Electronic document, <https://scahome.org/publications/proceedings/Proceedings.11Cooley.pdf>, Viewed 25 September 2017.
- Cooley, Theodore G., and Patricia T. Mitchell
1996 *Limited Data Recovery Investigations at Site CA-SDI-11,767, a La Jolla Complex Site Along the Lower San Diego River Valley*. Report prepared by Ogden Environmental and Energy Services Company for the Metropolitan Transit Development Board (MTDB). On file at the South Coastal Information Center, San Diego State University.
- ERCE
1991 *The Mission Valley West Light Rail Transit Project*. Report prepared for the Metropolitan Transit Development Board.
- Gallegos, Dennis R., and Danielle Huey
1992 *Historical/Archaeological Survey for Chevron Riverwalk, San Diego, California*. Gallegos and Associates, Carlsbad, California.
- Gilmer, Jo Anne, and Dayle M. Cheever
1996 *Results of Archaeological Monitoring of the North Mission Valley Interceptor Sewer Replacement – Phase II*. RECON, San Diego.
1997 *Results of Cultural Resource Monitoring for the Reconstruction of the Stardust Golf Course Project, Mission Valley, San Diego, California*. RECON, San Diego.
- Historical Resources Guidelines (HRG)
2001 *City of San Diego Historical Resources Guidelines – Appendix A: San Diego History*. Amended April 2001. Available online at: <http://www.sandiego.gov/developmentservices/industry/pdf/lmhistorical.pdf>.
- Kaldenberg, Russell L.
1975 Rancho Park North, A San Dieguito-La Jolla Shellfish Processing Site on Coastal Southern California. *Occasional Paper No. 6*. Imperial College Museum Society, El Centro, California.

Kyle, Carolyn, and Gallegos, Dennis R.

1995a *Archaeological Testing of Seven Sites for the Stardust Golf Course Realignment Project City of San Diego, California*. Gallegos and Associates, Carlsbad, California.

1995b *Archaeological Testing of Prehistoric Site CA-SDI-12126 for the North Mission Valley Interceptor Sewer Phase II City of San Diego, California*. Gallegos and Associates, Carlsbad, California.

Pigniolo, Andrew R.

1994 *Historic Properties Evaluation for the North Mission Valley Interceptor Sewer Phase II Project, City of San Diego*. Ms. on file at SCIC, SDSU.

Pigniolo, Andrew R., and Danielle Huey

1991 *Cultural Resource Testing and Evaluation for the Mission Valley West Light Rail Transit Project, San Diego, California*. Report prepared by ERCE (Ogden) for the Metropolitan Transit Development Board. On file at SCIC, SDSU.

Rogers, Malcolm J.

n.d. Unpublished site forms on file at the San Diego Museum of Man.

CONFIDENTIAL FIGURE REMOVED

CONFIDENTIAL FIGURE REMOVED

Confidential Figure 2. Locations of previously excavated units and shovel test pits by Ogden and Gallegos and associates at SDI-11767 and SDI-12220. Site boundaries on file with the SCIC are in pink. The revised site boundary of SDI-11767 by Kyle and Gallegos (1995a) is the hashed blue line. Locus 1 as defined by Kyle and Gallegos (1995a) is in green, and Locus 2 (also SDI-12220) as defined by Kyle and Gallegos (1995a) is in blue. Data are derived from the reprint of Kyle and Gallegos (1995a) Figure 3-2 in Cooley and Mitchell's (1996) Figure 5-1.

CONFIDENTIAL FIGURE REMOVED

CONFIDENTIAL FIGURE REMOVED

CONFIDENTIAL FIGURE REMOVED