

APPENDIX I
Cultural Resources Phase I Inventory
Letter Report

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**Subject: Cultural Resources Phase I Inventory Letter Report for the Fairmount Avenue Fire Station Project,
City of San Diego, California**

Dear Ms. Elizabeth Ocampo Vivero:

This report documents the Phase I cultural resources inventory conducted by Dudek for the Fairmount Avenue Fire Station Project (project) located in the City of San Diego (City), California. The project consists of the construction of a fire station located north of the intersection of 47th Street and Fairmount Avenue and off-site improvements within the existing 47th Street right-of-way and a temporary staging area located in a vacant lot southwest of the project site within the Mid-City: City Heights Communities Plan area (Figure 1). The project area of potential effect (APE) consists of a 1.88-acre vacant lot with natural open space which includes the proposed fire station structure, a parking lot, an associated Zone 1 Defensible Space area, and offsite improvements (Figure 2). The City is the lead agency responsible for compliance with the California Environmental Quality Act (CEQA). In accordance with CEQA and the City of San Diego Historical Resources Guidelines (2022), Dudek performed a Phase I cultural resources inventory for the entire project APE.

A records search was conducted using information from the South Coastal Information Center (SCIC) for the project APE and a 1-mile search radius around the project APE on February 23, 2018. The records search did not identify any previously recorded cultural resources within the project APE; however, 44 previously recorded cultural resources were identified within 1-mile of the project APE. The results of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search were negative and outreach letters to the Tribes were mailed on November 29, 2023.

The intensive pedestrian survey did not identify any cultural resources within the project APE; however, ground visibility was limited due to the presence of dense vegetation throughout a majority of the project APE. The historic aerials reveal that only some portions of the project APE have been previously disturbed from development of 47th Street and Fairmount Avenue, and adjacent residential and commercial development. While no cultural resources were identified within the APE during the survey, the project APE is located within close proximity to Chollas Creek, which was prehistorically used by local Native Americans as a valuable source of resources and as a travel route, with a known village located outside the records search area along the creek.

Dudek's cultural resources inventory of the project indicates that there is a low-to-moderate sensitivity for identifying subsurface cultural resources deposits during project implementation within areas that have not been previously disturbed. It is recommended that a qualified archaeologist and Kumeyaay Native American monitor be present

during the initial ground disturbing activities for the project. The monitoring program should be performed in accordance with City guidelines and must be directed by a City-qualified archaeologist (Principal Investigator). Should resources be identified, or if undisturbed sedimentary deposits which have the potential to contain archaeological resources are identified, monitoring may need to be increased, as determined by the archaeologist, the City, and in consultation with the Tribe that is monitoring. If disturbed sediments (e.g., fill) or other sediment formations are identified that do not have the potential to contain archaeological resources, then monitoring may be reduced or terminated.

1 Project Description and Location

The project is located approximately 0.5 miles east of Interstate 805 and 0.5 miles north of Highway 94 within the Chollas Creek watershed, in the City of San Diego, California. The project is located north of the intersection 47th Street and Fairmount Avenue, situated on the west side of 47th Street and southeast of Chollas Creek within the Mid-City: City Heights Community Plan Area. The project falls within Section 4, of Township 16 South, 17 South, Range 2 West on the National City, California 7.5-minute U.S. Geological Survey Topographic Quadrangle Map (Figure 1).

The project includes the development of a fire station which would serve to add additional emergency and medical response services to the surrounding community. The proposed multistory fire station includes one garage with two apparatus bays, exercise room, kitchen, and 10 bunk rooms (totaling 22,443 square feet). The project would also be serviced by a trash enclosure, an emergency generator, and a fuel tank. Vegetation removal, artificial slope creation and grading would be required to create a pad level with 47th Street for project access and construction. The single primary access to the project area would be directly from 47th Street.

2 Area of Potential Effect

The APE for the project consists of all areas subject to project impact activities, including ground and foundation preparation, utility installation, framing and assembly of the building and associated apparatus bay, grading and paving the parking lot and driveway areas, vegetation removal, and landscaping. The APE consists of 1.88 acres which includes the fire station structure, parking lot, Zone 1 Defensible Space area, and offsite improvements. The fire station structure, parking lot, and associated Zone 1 Defensible Space area encompasses Accessor's Parcel Number (APN) 541-190-16. Zone 1 would extend 35 feet beyond the fire station structure except on the west and south sides of the building, where it would extend 10 feet beyond the structure and include an up to a 6-foot-tall fire wall. A Zone 2 Brush Management area varying in width extends beyond Zone 1 into the parcel, as described by the project's Brush Management Plan. The offsite improvements consist of a new 22-foot-wide drive apron, new 40-foot-wide drive apron, and new crosswalk, concrete curb cut, and power pole within the existing 47th Street right-of-way (0.08 acre). A 0.52-acre temporary offsite staging area is located south of Sunshine Beradini Park and north of Federal Boulevard (Figure 2). The APE consists of vacant, natural open space, and the fire station would be situated at the top of a canyon, just west of 47th Street, the off-site improvements within the existing 47th Street right-of-way, and offsite temporary staging area in a vacant lot located north of Federal Boulevard. The vertical APE, as represented by the maximum depth required by excavation would vary between 5 to 8 feet in depth, and up to 22 feet for road construction.

3 Regulatory Framework

3.1 The California Register of Historic Resources (Public Resources Code section 5020 et seq.)

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

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

(California Public Resources Code section 5024.1(c).) Resources less than 50 years old are not considered for listing in the CRHR, but may be considered if it can be demonstrated that sufficient time has passed to understand the historical importance of the resource (see 14 CCR, section 4852(d)(2)).

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

3.2 Native American Historic Cultural Sites (California Public Resources Code section 5097 et seq.)

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

3.3 California Native American Graves Protection and Repatriation Act

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

3.4 California Environmental Quality Act

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

1. California Public Resources Code section 21083.2(g): Defines “unique archaeological resource.”
2. California Public Resources Code section 21084.1 and CEQA Guidelines section 15064.5(a): Define historical resources. In addition, CEQA Guidelines section 15064.5(b) defines the phrase “substantial adverse change in the significance of an historical resource;” it also defines the circumstances when a project would materially impair the significance of a historical resource.
3. California Public Resources Code section 5097.98 and CEQA Guidelines section 15064.5(e): Set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated ceremony.
4. California Public Resources Code sections 21083.2(b)-(c) and CEQA Guidelines section 15126.4: Provide information regarding the mitigation framework for archaeological and historic resources, including options of preservation-in-place mitigation measures; preservation-in-place is the preferred manner of mitigating impacts to significant archaeological sites because it maintains the relationship between artifacts and the archaeological context, and may also help avoid conflict with religious or cultural values of groups associated with the archaeological site(s).

Under CEQA, a project may have a significant effect on the environment if it may cause “a substantial adverse change in the significance of an historical resource” (California Public Resources Code section 21084.1; CEQA Guidelines section 15064.5(b)). If a site is either listed or eligible for listing in the CRHR, or if it is included in a local register of historic resources, or identified as significant in a historical resources survey (meeting the requirements of California Public Resources Code section 5024.1(q)), it is a “historical resource” and is presumed to be historically or culturally significant for purposes of CEQA (California Public Resources Code section 21084.1; CEQA Guidelines section 15064.5(a)). The lead agency is not precluded from determining that a resource is a historical resource even if it does not fall within this presumption (California Public Resources Code section 21084.1; CEQA Guidelines section 15064.5(a)).

A “substantial adverse change in the significance of an historical resource” reflecting a significant effect under CEQA 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” (CEQA Guidelines section 15064.5(b)(1); California Public Resources Code section 5020.1(q)). In turn, the significance of a historical resource is materially impaired when a project:

1. Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
2. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
3. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a lead agency for purposes of CEQA.

See Section 2.7, below for a discussion of the CEQA guidelines for determining significance and mitigating impacts to unique archaeological resources.

3.5 California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98

CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. As described below, these procedures are detailed in California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98.

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. Health and Safety Code Section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the County coroner has examined the remains (California Health and Safety Code Section 7050.5[b]). If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact the NAHC within 24 hours (California Health and Safety Code Section 7050.5[c]). In accordance with California Public Resources Code Section 5097.98(a), the NAHC will notify the Most Likely Descendant (MLD). With the permission of the landowner, the MLD may inspect the site of discovery. Within 48 hours of being granted access to the site, the MLD may recommend means of treatment or disposition, with appropriate dignity, of the human remains and associated grave goods.

3.6 Assembly Bill 52

California Assembly Bill 52, which took effect July 1, 2015, establishes a consultation process between California Native American Tribes and lead agencies in order to address tribal concerns regarding project impacts and mitigation to “tribal cultural resources” (TCR). Public Resources Code Section 21074(a) defines TCRs and states that a project that has the potential to cause a substantial adverse change to a TCR is a project that may have an adverse effect on the environment. A TCR is defined as a site, feature, place, cultural landscape, sacred place, and object with cultural value to a California Native American tribe that is either:

1. listed or eligible for listing in the CRHR or a local register of historical resources, or

2. determined by a lead agency to be a TCR.

3.7 City of San Diego Historic Guidelines

The Programmatic Environmental Impact Report for the City General Plan states the following:

Chapters 11, 12 and 14 of the City of San Diego Municipal Code establish the Historical Resources Board (HRB) authority, appointment and terms, meeting conduct, and powers and duties; the designation process including the nomination process, noticing and report requirements, appeals, recordation, amendments or rescission, and nomination of historical resources to state and national registers; and development regulations for historical resources. The purpose of these regulations is to protect, preserve, and, where damaged, restore the historical resources of San Diego. The historical resources regulations require that designated historical resources and traditional cultural properties be preserved unless deviation findings can be made by the decision maker as part of a discretionary permit. Minor alterations consistent with the U.S. Secretary of the Interior's Standards are exempt from the requirement to obtain a separate permit but must comply with the regulations and associated historical resources guidelines. Limited development may encroach into important archaeological sites if adequate mitigation measures are provided as a condition of approval.

Historical Resources Guidelines, located in the Land Development Manual, provide property owners, the development community, consultants and the general public explicit guidance for the management of historical resources located within the City's jurisdiction. These guidelines are designed to implement the historical resources regulations and guide the development review process from the need for a survey and how impacts are assessed to available mitigation strategies and report requirements and include appropriate methodologies for treating historical resources located in the City.

Any improvement, building, structure, sign, interior element and fixture, feature, site, place, district, area, or object may be designated a historical resource by the City's Historical Resources Board if it meets one or more of the following designation criteria:

- a. 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;
- b. Is identified with persons or events significant in local, state or national history;
- c. 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;
- d. Is representative of the notable work of a master builder, designer, architect, engineer, landscape architect, interior designer, artist, or craftsman;
- e. Is listed or has been determined eligible by the National Park Service for listing on the National Register of Historic Places or is listed or has been determined eligible by the State Historical Preservation Office for listing on the State Register of Historical Resources; or
- f. 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.

According to the City's Significance Determination Thresholds (City of San Diego 2011), impacts to historical resources would be significant if the project would:

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

In general, the City's Historical Resource Guidelines build on federal and state cultural resources laws and guidelines in an attempt to streamline the process of considering impacts to cultural resources within the City's jurisdiction, while maintaining that some resources not significant under federal or state law may be considered historical under the City's guidelines. Essentially, the City's historic resource guidelines localize cultural resources laws providing local perspective on significance criteria. In order to apply the criteria and determine the significance of potential project impacts to a cultural resource, the APE of the project must be defined for both direct impacts and indirect impacts. Indirect impacts can include increased public access to an archaeological site, or visual impairment of a historically significant viewshed related to a historic building or structure.

4 Project Background

4.1 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 500–1769), and Ethnohistoric (post-AD 1769).

4.2.1 Paleoindian Period (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 CA-SDI-4669/W-12, in La Jolla. A human burial from CA-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 (CA-MNO-679)—a multicomponent fluted point site, and CA-MNO-680—a single component Great Basined Stemmed point site (Basgall et al. 2002). At CA-MNO-679 and CA-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 kilometer 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 CA-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). CA-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 (CA-SDI-149) is representative of typical Paleoindian occupation in the San Diego region that possibly dates between 10,365 and 8200 BC (Warren et al. 2004, p. 26). Termed San Dieguito (Rogers 1945), assemblages at the Harris site are qualitatively distinct from most others in the San Diego region because the site has large numbers of finely made bifaces (including projectile points), formal flake tools, a biface reduction trajectory, and relatively small amounts of processing tools (Warren 1964, 1968). Despite the unique assemblage composition, the definition of San Dieguito as a separate cultural tradition is hotly debated. Gallegos (1987) suggested that the San Dieguito pattern is simply an inland manifestation of a broader economic pattern. Gallegos' interpretation of San Dieguito has been widely accepted in recent years, in part because of the difficulty in distinguishing San Dieguito components from other assemblage constituents. In other words, it is easier to ignore San Dieguito as a distinct socioeconomic pattern than it is to draw it out of mixed assemblages.

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

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

4.2.2 Archaic Period (8,000 BC - AD 500)

The more than 2500-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.

4.2.3 Late Prehistoric Period (AD 500 - 1769)

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 (True 1980), while the same period in southern San Diego County is called the Cuyamaca Complex and is thought to extend from AD 500 until Ethnohistoric times (Meighan 1959). Rogers (1929) also subdivided the last 1,000 years into the Yuman II and III cultures, based on the distribution of ceramics. Despite these regional complexes, each is defined by the addition of arrow points and ceramics, and the widespread use of bedrock mortars. Vagaries in the appearance of the bow and arrow and ceramics make the temporal resolution of the San Luis Rey and Cuyamaca complexes difficult. For this reason, the term Late Prehistoric is well-suited to describe the last 1,500 years of prehistory in the San Diego region.

Temporal trends in socioeconomic adaptations during the Late Prehistoric period are poorly understood. This is partly due to the fact that the fundamental Late Prehistoric assemblage is very similar to the Archaic pattern, but includes arrow points and large quantities of fine debitage from producing arrow points, ceramics, and cremations. The appearance of mortars and pestles is difficult to place in time because most mortars are on bedrock surfaces; bowl mortars are actually rare in the San Diego region. Some argue that the Ethnohistoric intensive acorn economy extends as far back as AD 500 (Bean and Shipek 1978). However, there is no substantial evidence that reliance on acorns, and the accompanying use of mortars and pestles, occurred prior to AD 1400. True (1980) argued that acorn

processing and ceramic use in the northern San Diego region did not occur until the San Luis Rey pattern emerged after approximately AD 1450. For southern San Diego County, the picture is less clear. The Cuyamaca Complex is the southern counterpart to the San Luis Rey pattern, however, and is most recognizable after AD 1450 (Hector 1984). Similar to True (1980), Hale (2009) argued that an acorn economy did not appear in the southern San Diego region until just prior to Ethnohistoric times, and that when it did occur, a major shift in social organization followed.

4.2.4 Ethnohistoric (post-AD 1769)

The history of the Native American communities prior to the mid-1700s has largely been reconstructed through later mission-period and early ethnographic accounts. The first records of the Native American inhabitants of the San Diego region come predominantly from European merchants, missionaries, military personnel, and explorers. These brief, and generally peripheral, accounts were prepared with the intent of furthering respective colonial and economic aims and were combined with observations of the landscape. They were not intended to be unbiased accounts regarding the cultural structures and community practices of the newly encountered cultural groups. The establishment of the missions in the San Diego region brought more extensive documentation of Native American communities, though these groups did not become the focus of formal and in-depth ethnographic study until the early twentieth century (Boscana 1846; Fages 1937; Geiger and Meighan 1976; Harrington 1934; Laylander 2000). The principal intent of these researchers was to record the precontact, culturally specific practices, ideologies, and languages that had survived the destabilizing effects of missionization and colonialism. This research, often understood as “salvage ethnography,” was driven by the understanding that traditional knowledge was being lost due to the impacts of modernization and cultural assimilation. Alfred Kroeber applied his “memory culture” approach (Lightfoot 2005, p. 32) by recording languages and oral histories within the San Diego region. Kroeber’s 1925 assessment of the impacts of Spanish missionization on local Native American populations supported Kumeyaay traditional cultural continuity (Kroeber 1925, p. 711):

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

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

The traditional cultural boundaries between the Luiseño and Kumeyaay Native American tribal groups have been well defined by anthropologist Florence C. Shipek:

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. [1993 summarized by the San Diego County Board of Supervisors 2007:6.]

Based on ethnographic information, it is believed that at least 88 different languages were spoken from Baja California Sur to the southern Oregon state border at the time of Spanish contact (Johnson and Lorenz 2006, p. 34). The distribution of recorded Native American languages has been dispersed as a geographic mosaic across California through six primary language families (Golla 2007, p. 71). The Native American inhabitants of the region spoke using either the Ipai or Tipai language subgroups of the Yuman language group. Ipai and Tipai are spoken respectively by the northern and southern Kumeyaay communities, with the San Diego River acting as the boundary between the two. As Ipai and Tipai are mutually intelligible, they are often treated as dialects of a larger Kumeyaay tribal group rather than as distinctive languages, though this has been debated (Luomala 1978; Laylander 2010). Victor Golla has contended that one can interpret the amount of variability within specific language groups as being associated with the relative “time depth” of the speaking populations (Golla 2007, p. 80). A large amount of variation within the language of a group represents a greater time depth than 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, p. 71). This type of interpretation is modeled on concepts of genetic drift and gene flows that are associated with migration and population isolation in the biological sciences.

Golla suggested that there are two language families associated with Native American groups who traditionally lived throughout the San Diego County region. The northern San Diego tribes have traditionally spoken Takic languages that may be assigned to the larger Uto–Aztecan family (Golla 2007, p. 74). These groups include the Luiseño, Cupeño, and Cahuilla. Golla has interpreted the amount of internal diversity within these language-speaking communities to reflect a time depth of approximately 2,000 years. Other researchers have contended that Takic may have diverged from Uto–Aztecan ca. 2600 BC–AD 1, which was later followed by the diversification within the Takic speaking San Diego tribes, occurring approximately 1500 BC–AD 1000 (Laylander 2010). The majority of Native American tribal groups in southern San Diego region have traditionally spoken Yuman languages, a subgroup of the Hokan Phylum. Golla has suggested that the time depth of Hokan is approximately 8,000 years (Golla 2007, p. 74). The Kumeyaay tribal communities share a common language group with the Cocopah, 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 (Pignoli 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;

Shipek 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 (Luomala 1978). The coastal Kumeyaay exchanged a number of local goods, such as seafood, coastal plants, and various types of shell for items including acorns, agave, mesquite beans, gourds, and other more interior plants of use (Luomala 1978). Shellfish would have been procured from three primary environments, including the sandy open coast, bay and lagoon, and rocky open coast. The availability of these marine resources changed with the rising sea levels, siltation of lagoon and bay environments, changing climatic conditions, and intensity of use by humans and animals (Gallegos and Kyle 1988; Pignolo 2005; Warren and Pavesic 1963). Shellfish from sandy environments included *Donax*, *Saxidomas*, *Tivela*, and others. Rocky coast shellfish dietary contributions consisted of *Pseudochama*, *Megastrea*, *Saxidomus*, *Protothaca*, *Megathura*, 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 (*Canis latrans*), and others. In lesser numbers, reptiles and amphibians may have been consumed.

A number of local plants were used for food and medicine. These were exploited seasonally and were both traded between regional groups and gathered as a single triblet moved between habitation areas. Some of the more common of these that might have been procured locally or as higher elevation varieties would have included buckwheat (*Eriogonum fasciculatum*), Agave, Yucca, lemonade 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).

The ethnographic villages of Las Choyas and Pu-Shuyi have been identified archaeologically and ethnographically within the communities of southeastern San Diego and Encanto, and water sources such as the Chollas Creek, South Chollas Creek, Imperial Creek, and Sweetwater River were subsistence resources and transportation routes (AECOM 2014; HELIX 2024).

4.2.5 The 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 to deal with the local Kumeyaay and Ipai 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.

5 Methods and Results

5.1 Archival Research

Dudek consulted historic maps and aerial photographs to understand development within the project APE and surrounding properties. Historic aerial photographs of the project were available for between 1953 and 2020 (NETR 2023). The 1953 aerial photograph reveals that portions of the project APE have been disturbed from the construction of 47th Street and the surrounding developed residential properties. By 1964, the aerial imagery shows grading and commercial development immediately south of the project APE, where the Reddaway Trucking Company is currently located, and an increase in residential properties to the northwest of the APE. The 1966 aerial shows mass grading for residential development (structures and roads) to the north of the project APE, where the Leisureland Mobile Homes is currently located. No substantial changes are observed within the project APE and the surrounding area in the following aerals from 1980 to 1985.

By 1986, there is some vegetation removal and light grading along the intersection of Chollas Parkway and 47th Street, along the northern section of the project's APE. Additional grading is observed in the 1987 aerial imagery at the intersection of Chollas Parkway and 47th Street. On the 1988 aerial, some vegetation clearing is observed within the northern and southern sections of the project APE. By 1990, the aerial imagery reveals that a majority of the vegetation within the project APE has been cleared. The 1993 aerial photograph reveals mass grading within the southern section of the project APE, and immediately south of the project APE for the expansion of Fairmont

Avenue to 47th Street. By 1994, the northern portion of 47th Street near Chollas Parkway has been graded. Additionally, there is evidence of grading within the southern section of the project APE and immediately south of the project APE. The 1996 aerial imagery reveals vegetation removal throughout a majority of the project APE. No substantial changes are observed within the project APE and the surrounding area in the following aerials from 1997 to 2016.

The aerial imagery from 2019 reveals a cleared dirt pathway within the project APE, and two small areas within the eastern section of the APE where two utility poles currently exist. The 2020 aerial imagery represents the current conditions of the project APE. No historic age structures are present within the project APE. The review of the historic aerials reveals that the project APE has undergone some grading during the construction of 47th Street, Fairmount Avenue, and the adjacent residential development, especially near the eastern and southern portions of the project APE.

The historic topographic (topo) maps of the project APE were reviewed (earliest map available is 1904). The 1904 topo map and subsequent topo maps shows Chollas Creek to the west of the project APE, and 47th Street is first observed on the 1944 topo map. A review of the topo maps did not identify historic age structures within the project APE.

5.2 Records Search

5.2.1 Previously Recorded Cultural Resources

Dudek has retained a subscription to data held at the South Coastal Information Center (SCIC) at San Diego State University. As part of this subscription, Dudek is approved to conduct records searches. A records search for the project APE with a surrounding 1-mile radius around the project APE was conducted on February 23, 2018. The records search results did not identify any cultural resources within the project APE; however, the records search did identify 44 cultural resources within 1-mile of the project APE (Table 1). Of the 44 cultural resources, six are prehistoric resources, including one habitation/midden site, one shell scatter, and four lithic sites. The remaining 38 historic period resources include 26 residential properties, seven trash deposits, three commercial buildings/structures, and one recorded resource which includes a series historic sidewalk stamps identified in the vicinity. No historic properties are located within the project APE or within the 1-mile of the project APE. The results of the records search and all California Department of Parks and Recreation (DPR) forms are attached as Confidential Attachment A.

Table 1. Previously Recorded Cultural Resources in the 1-Mile Record Search Radius

Primary Number	Trinomial (CA-)	Age	Description	Eligibility for CRHR
Outside the Project APE				
37-005580	SDI-005580	Historic	Adobe Remains	Not evaluated
37-010528	SDI-010528	Historic	Multiple Trash deposits/scatters	Not Evaluated
37-013002	SDI-013002	Prehistoric	Habitation Site with Midden	Not Evaluated
37-013003	SDI-013003	Prehistoric	Lithic artifact scatter	Not Evaluated
37-014493	-	Historic	Historic Police Range/ Structures	Not Evaluated

Table 1. Previously Recorded Cultural Resources in the 1-Mile Record Search Radius

Primary Number	Trinomial (CA-)	Age	Description	Eligibility for CRHR
Outside the Project APE				
37-014494	SDI-014162	Prehistoric	Lithic Scatter	Not Evaluated
37-014495	SDI-014163	Historic	Trash Deposit	Not Evaluated
37-014496	SDI-014164	Historic	Trash Deposit	Not Evaluated
37-014497	SDI-014165	Historic	Trash Deposit	Not Evaluated
37-014498	SDI-014166	Prehistoric	Lithic Procurement & Scatter	Not Evaluated
37-014499	SDI-014167	Prehistoric	Lithic Procurement & Scatter	Not Evaluated
37-024259	-	Historic	Trash Deposit	Not Evaluated
37-027548	-	Historic	Multi-family Property	Ineligible
37-027558	-	Historic	Single Family Property	Ineligible
37-027554	-	Historic	Single Family Property	Ineligible
37-027557	-	Historic	Single Family Property	Ineligible
37-027549	-	Historic	Single Family Property	Ineligible
37-027550	-	Historic	Single Family Property	Ineligible
37-027551	-	Historic	Multi-family Property	Ineligible
37-027552	-	Historic	Single Family Property	Ineligible
37-027553	-	Historic	Single Family Property	Ineligible
37-027555	-	Historic	Single Family Property	Ineligible
37-027556	-	Historic	Single Family Property	Ineligible
37-027559	-	Historic	Multi-family Property	Ineligible
37-027560	-	Historic	Single Family Property	Ineligible
37-027561	-	Historic	Single Family Property	Ineligible
37-027562	-	Historic	Single Family Property	Ineligible
37-027563	-	Historic	Single Family Property	Ineligible
37-027564	-	Historic	Single Family Property	Ineligible
37-027565	-	Historic	Single Family Property	Ineligible
37-027566	-	Historic	Single Family Property	Ineligible
37-027568	-	Historic	Multi-family Property	Ineligible
37-027564	-	Historic	Single Family Property	Ineligible
37-027570	-	Historic	1-Story Commercial Building	Ineligible
37-027587	-	Historic	Single Family Property	Ineligible
37-027591	-	Historic	Single Family Property	Ineligible
37-027592	-	Historic	Single Family Property	Ineligible
37-031588	-	Historic	Trash Deposit	Not Evaluated
37-031589	SDI-020038	Prehistoric	Shell Scatter	Not Evaluated
37-032340	SDI-020506	Historic	Trash Deposit	Not Evaluated
37-033515	-	Historic	Sidewalk Stamps	Not Evaluated
37-035416	-	Historic	Unimproved Property	Ineligible
37-035944	-	Historic	Holy Cross Cemetery & Mausoleum	Appears Eligible

Table 1. Previously Recorded Cultural Resources in the 1-Mile Record Search Radius

Primary Number	Trinomial (CA-)	Age	Description	Eligibility for CRHR
Outside the Project APE				
37-035945	-	Historic	Single Family Property	Ineligible

5.2.2 Previous Cultural Resources Reports

The SCIC records search results indicate that 95 studies have been conducted within 1-mile of the project APE between 1973 and 2017 (Table 2). Of the 95 studies, four intersect the project APE which consist of an archaeological resource analysis, a draft environmental impact report for the City of San Diego Master Storm Water System Maintenance Program, a cultural inventory for the May property (APN 541-190-16-00), and a cultural assessment for Caltrans. These studies did not identify any cultural resources within the project APE. Based on the previous studies, the entire project APE (100%) has been previously studied. The complete results of the SCIC records search are attached as Confidential Attachment A.

Table 2. Reports Intersecting Project APE

Report Number	Authors	Date	Title
SD-03604	CITY OF SAN DIEGO, DEVELOPMENT SERVICES	1999	CULTURAL RESOURCES INVENTORY OF THE MAY PROPERTY AT FAIRMONT AVENUE AND 47TH STREET, CITY OF SAN DIEGO, CALIFORNIA APN NO. 541-190-16-00
SD-11826	AFFINIS	2008	ARCHAEOLOGICAL RESOURCES ANALYSIS FOR THE MASTER STORMWATER SYSTEM MAINTENANCE PROGRAM, SAN DIEGO, CALIFORNIA PROJECT. NO. 42891
SD-12200	CITY OF SAN DIEGO DEVELOPMENT SERVICES DEPARTMENT	2009	DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE MASTER STORM WATER SYSTEM MAINTENANCE PROGRAM (MSWSMP)
SD-16427	CALTRANS	1987	ARCHIE MOORE HOME, 3517 E STREET, SAN DIEGO, CA 92102

5.3 NAHC and Tribal Correspondence

Dudek requested a Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search on October 27, 2023, for the project APE (Attachment B). The SLF consists of a database of known Native American resources. These resources may not be included in the SCIC database. The NAHC SLF results were received on November 27, 2023, and the results were negative. The NAHC additionally provided a list of Native American tribes and individuals/organizations with traditional geographic associations that might have knowledge of cultural resources in this area. Outreach letters were mailed on November 29, 2023, to all Native American representatives included on the NAHC contact list. These letters requested additional information relating to Native American resources that

may be impacted by the project. Native American representatives were requested to define a general area where known resources intersect the project APE. One response has been received to date. The Baraona Band of Mission Indians responded on December 15, 2023 stating that they are not aware of any specific cultural resources on the project site; however, the site is along a watercourse (Chollas Creek) that is a tributary to the San Diego River in Mission Valley, where ancestors of the Barona Band lived in pre-contact times, which increases the likelihood that cultural resources are present on or below the surface of the site and wish to have a qualified archaeologist walk the site to determine if there is any indication of surface or buried cultural resources before any ground disturbance occurs. The NAHC correspondence is included in Attachment B.

In compliance with AB 52, the City, as lead agency, is responsible for conducting government to government consultation with pertinent tribal entities. On August 11, 2020, AB 52 Notification letters were sent to the Lipay Nation of Santa Ysabel, Jamul Indian Village, and the San Pasqual Band of Diegueno Mission Indians. On October 21, 2020, additional information was sent to the San Pasqual Band of Diegueno Mission Indians as requested, and they were informed that the project will require Native American monitoring and consultation was concluded on this project.

5.4 Intensive Pedestrian Survey

The intensive pedestrian survey of the project APE was conducted by Dudek archaeologist Makayla Murillo on November 8, 2023, and Red Tail Environmental Native American monitor Keadon Graham participated in the survey. An intensive pedestrian survey of the offsite temporary staging area was conducted by Dudek archaeological Keshia Montifolca on September 9, 2024, and Red Tail Environmental Native American monitor Clint Linto participated in the survey. All survey work was conducted employing standard archaeological procedures and techniques consistent with the Secretary of the Interior Standards for a cultural resources inventory (NPS 2018). Ten-meter interval survey transects were conducted trending north to south where possible for the project APE. The ground surface was examined for prehistoric artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools, ceramics, fire-affected rock), soil discoloration that might indicate the presence of a cultural midden, soil depressions, features indicative of the current or former presence of structures or buildings (e.g., standing exterior walls, post holes, foundations), and historic artifacts (e.g., metal, glass, ceramics, building materials). Ground disturbances such as burrows, cut banks, and drainages were also visually inspected for exposed subsurface materials.

The project APE is situated on a northern facing hillside. Evidence of previous ground disturbance for the adjacent road construction was observed; however, the project APE was largely undeveloped. Vegetation consisted of dense brush and shrubs including coyote bush (*Baccharius* sp.), juniper shrub (*Juniperus* sp.), star thistle (*Centaurea* sp.), dead grass, and trees including eucalyptus (*Eucalyptus* sp.). Soil consisted of moderately compacted silty clay with 25-50% cobble and gravel content. Ground visibility was poor (0-25%) in the north and northwestern sections of the project APE that contained dense vegetation (Figure 3). Ground visibility was good (50-75%) in the southern section of the project APE, which contained dirt trails and cleared areas for irrigation systems (Figure 4). Approximately 75% of the project APE contained dense vegetation. Modern debris were scattered throughout the project APE and consisted of food/beverage waste, truck tires, landscaping equipment, and homeless encampments. No cultural or built environment resources were identified during the survey.

The offsite temporary staging area is located on a vacant lot adjacent to a park, concrete drainage, and a roadway. Gravel has been placed throughout a majority of the staging area. Vegetation consisted of non-native

grass, horseweed, and non-native trees. A majority of the ground visibility was great (80-90), especially in areas where the ground surface was not obscured by vegetation or gravel. Ground visibility was fair (25-50%) in areas where dense vegetation was present, which were located along the northern and eastern boundary of the staging area. Modern trash (e.g., bike frame, boxes, and food wrappers) and vehicle tracks were observed throughout staging area. A concrete drainage is located adjacent and to the north, concrete sidewalks and a roadway are located to the south, and a chain link fence is located to the northern and eastern sections of the staging area. No cultural or built environment resources were identified during the survey.

5.5 Buried Sensitivity

According to the U.S. Department of Agriculture Natural Resources Conservation Services (USDA 2024), two soil types are mapped in the project APE, including Huerhuero loam, 15 to 30 percent slopes, and made land. The Huerhuero loam soil series generally occur on marine terraces at elevations at approximately 1,100 feet and are comprised of calcareous alluvium derived from sedimentary rock. Reoccurring alluvial action and flooding serve to support the presence of subsurface cultural deposits in the area. Since there are alluvial soils present throughout the project APE, there is moderate potential for subsurface cultural resources.

There is a low-to-moderate sensitivity for identifying subsurface cultural resources deposits during project implementation within areas that have not been previously disturbed. The SCIC records search did not identify any previously recorded cultural resources within the project APE; however, 44 previously recorded cultural resources were identified within 1-mile of the project APE. The intensive pedestrian survey did not identify any cultural resources within the project APE; however, ground visibility was limited due to the presence of dense vegetation throughout a majority of the project APE. The historic aerials reveal that only some portions of the project APE have been previously disturbed from the development of 47th Street and Fairmount Avenue, and adjacent residential and commercial development. The ethnographic villages of *Las Choyas* and *Pu-Shuyi* have been identified within the communities of Southeastern San Diego and Encanto. While no cultural resources were identified within the APE during the survey, the project APE is located within close proximity to Chollas Creek, which was prehistorically used by local Native Americans as a valuable source of resources and as a travel route, and would have been an attractive location for prehistoric camps or habitation sites. In addition, the ethnographic villages of *Las Choyas* and *Pu-Shuyi* have been identified within the communities of southeastern San Diego and Encanto (AECOM 2014; HELIX 2024).

6 Impacts and Mitigation

While no cultural resources were identified within the project APE during the pedestrian survey, based on the quantity of cultural resources identified within the 1-mile radius of the APE, the APE's close proximity to Chollas Creek, which was prehistorically utilized by local Native Americans as a valuable source of resources and as utilized as a travel route, and the presence of alluvial soils within the APE, there is a low-to-moderate sensitivity for identifying subsurface cultural resources deposits and during project implementation within areas that have not been previously disturbed.

Since the project includes ground disturbance associated with construction of the new fire station, the potential to encounter and/or destroy previously undiscovered archaeological materials or features during earth-moving activities exists. Any substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 would be a potentially significant impact. The mitigation measures **MM-HIST-1** presented below, would

reduce potentially significant impacts to a **less-than-significant** level by requiring the implementation of a cultural resources monitoring program in accordance with City guidelines and for construction to halt in the event of an archaeological discovery during construction activities, and evaluation of the find by a qualified archaeologist.

MM-HIST-1

ARCHAEOLOGICAL RESOURCES

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

A. Entitlements Plan Check

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

B. Letters of Qualification have been submitted to the E&CP Environmental Designee

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

II. Prior to the Start of Construction

A. Verification of Records Search

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

B. PI Shall Attend Precon Meetings

1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Native American consultant/monitor (where Native American resources may be impacted), Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), and MMC. The qualified Archaeologist and Native American Monitor shall attend any grading/excavation-related Precon Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor.

- a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.
2. Acknowledgement of Responsibility for Curation (CIP or Other Public Projects)
The applicant shall submit a letter to MMC acknowledging their responsibility for the cost of curation associated with all phases of the archaeological monitoring program.
3. Identify Areas to be Monitored
Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) (with verification that the AME has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits.
The AME shall be based on the results of a site-specific records search as well as information regarding the age of existing pipelines, laterals, and associated appurtenances and/or any known soil conditions (native or formation).
MMC shall notify the PI that the AME has been approved.
4. When Monitoring Will Occur
 - a. Prior to starting any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.
 - b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information, such as a review of final construction documents which indicate conditions such as the age of the existing pipe to be replaced, depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.
5. Approval of AME and Construction Schedule
After MMC approves the AME, the PI shall submit to MMC written authorization of the AME and Construction Schedule from the CM.

III. During Construction

- A. Monitor Shall be Present During Grading/Excavation/Trenching
 1. The Archaeological Monitor shall be present full-time during all soil disturbing and grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances, OSHA safety requirements may necessitate modification of the AME.
 2. The Native American consultant/monitor shall determine the extent of their presence during soil disturbing and grading/excavation/trenching activities based on the AME and provide that information to the PI and MMC. If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop, and the Discovery Notification Process detailed in Section III.B-C and IV.A-D shall commence.
 3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous

grading/trenching activities, presence of fossil formations, or when native soils are encountered that may reduce or increase the potential for resources to be present.

4. The archaeological and Native American consultant/monitor shall document field activity via the Consultant Site Visit Record (CSV). The CM shall fax the CSVs to the RE on the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC.

B. Discovery Notification Process

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

C. Determination of Significance

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

IV. Discovery of Human Remains

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

- A. Notification
 - 1. Archaeological Monitor shall notify the RE, MMC, and the PI, if the Monitor is not qualified as a PI. MMC will notify the appropriate E&CP Environmental Designee to assist with the discovery notification process.
 - 2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone.
- B. Isolate discovery site
 - 1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenience of the remains.
 - 2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenience.
 - 3. If a field examination is not warranted, the Medical Examiner will determine with input from the PI, if the remains are or are most likely to be of Native American origin.
- C. If Human Remains ARE determined to be Native American
 - 1. The Medical Examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, ONLY the Medical Examiner can make this call.
 - 2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.
 - 3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with CEQA Section 15064.5(e), the California Public Resources and Health & Safety Codes.
 - 4. The MLD will have 48 hours to make recommendations to the property owner or representative for the treatment or disposition with proper dignity of the human remains and associated grave goods.
 - 5. Disposition of Native American Human Remains will be determined between the MLD and the PI, and, if:
 - a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being granted access to the site, OR;
 - b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner, the landowner shall reinter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance, THEN
 - c. To protect these sites, the landowner shall do one or more of the following:
 - (1) Record the site with the NAHC;
 - (2) Record an open space or conservation easement; or

(3) Record a document with the County. The document shall be titled "Notice of Reinterment of Native American Remains" and shall include a legal description of the property, the name of the property owner, and the owner's acknowledged signature, in addition to any other information required by PRC 5097.98. The document shall be indexed as a notice under the name of the owner.

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

B. If Human Remains are NOT Native American

1. The PI shall contact the Medical Examiner and notify them of the historic era context of the burial.
2. The Medical Examiner will determine the appropriate course of action with the PI and City staff (PRC 5097.98).
3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the San Diego Museum of Man for analysis. The decision for the internment of the human remains shall be made in consultation with MMC, E&CP Environmental Designee, the applicant/landowner, any known descendant group, and the San Diego Museum of Man.

V. Night and/or Weekend Work

A. If night and/or weekend work is included in the contract

1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.
2. The following procedures shall be followed.
 - a. No Discoveries
In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSV and submit to MMC via fax by 8 a.m. of the next business day.
 - b. Discoveries
All discoveries shall be processed and documented using the existing procedures detailed in Sections III – During Construction, and IV – Discovery of Human Remains. Discovery of human remains shall always be treated as a significant discovery.
 - c. Potentially Significant Discoveries
If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III – During Construction and IV – Discovery of Human Remains shall be followed.
 - d. The PI shall immediately contact the RE and MMC, or by 8 a.m. of the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.

- B. If night and/or weekend work becomes necessary during the course of construction
 - 1. The Construction Manager shall notify the RE at least 24 hours before the work is to begin.
 - 2. The RE shall notify MMC immediately.
- C. All other procedures described above shall apply, as appropriate.

VI. Post Construction

- A. Submittal of Draft Monitoring Report
 - 1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix C/D) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC via the RE for review and approval within 90 days following the completion of monitoring. It should be noted that if the PI is unable to submit the Draft Monitoring Report within the allotted 90-day timeframe as a result of delays with analysis, special study results or other complex issues, a schedule shall be submitted to MMC establishing agreed due dates and the provision for submittal of monthly status reports until this measure can be met.
 - a. For significant archaeological resources encountered during monitoring, the Draft Monitoring Report shall include the Archaeological Data Recovery Program or Pipeline Trenching Discovery Process.
 - b. Recording Sites with State of California Department of Parks and Recreation
The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.
 - 2. MMC shall return the Draft Monitoring Report to the PI via the RE for revision or, for preparation of the Final Report.
 - 3. The PI shall submit a revised Draft Monitoring Report to MMC via the RE for approval.
 - 4. MMC shall provide written verification to the PI of the approved report.
 - 5. MMC shall notify the RE of receipt of all Draft Monitoring Report submittals and approvals.
- B. Handling of Artifacts
 - 1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and cataloged.
 - 2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area, that faunal material is identified as to species, and that specialty studies are completed, as appropriate.
- C. Curation of artifacts: Accession Agreement and Acceptance Verification
 - 1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the Native American representative, as applicable.
 - 2. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with

- state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures were taken to ensure no further disturbance occurs in accordance with Section IV – Discovery of Human Remains, Subsection C.
3. The PI shall submit the Accession Agreement and catalog record(s) to the RE or BI, as appropriate for donor signature, with a copy submitted to MMC.
 4. The RE or BI, as appropriate, shall obtain a signature on the Accession Agreement and shall return it to PI with a copy submitted to MMC.
 5. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE and MMC.

D. Final Monitoring Report(s)

1. After notification from MMC of the approved report, the PI shall submit one copy of the approved Final Monitoring Report to the RE and one copy to MMC (even if negative) within 90 days.
2. The RE shall not issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from MMC, which includes the Acceptance Verification from the curation institution.

No prehistoric or historic-period burials, including those interred outside of formal cemeteries, were identified within the project APE as a result of the CHRIS records search, NAHC SLF search and tribal outreach, or pedestrian survey. Therefore, the likelihood of encountering human remains within the subsurface of the project APE is low. However, the possibility of encountering human remains within the project APE exists such that potentially significant impacts could occur. The discovery of human remains would require handling in accordance with PRC 5097.98, which states that in the event that human remains are discovered during construction, construction activity shall be halted, and the area shall be protected until consultation and treatment can occur as prescribed by law. Therefore, with adherence to state law and with the implementation of **MM-HIST-1** impacts to human remains would be **less than significant**.

Should you have any questions relating to this report and its findings, please do not hesitate to contact us at Dudek.

Respectfully submitted,



Keshia Montifolca, MA, RPA – Archaeologist

and



Makayla Murillo, BA – Archaeologist

Att.: *Figure 1, Project Location*
Figure 2, APE Map
Figure 3. Overview of vegetation within APE, view facing northwest
Figure 4. Overview dirt trail, view facing north
National Archaeological Database Information Sheet
Confidential Attachment A, SCIC Records Search Results
Attachment B, NAHC Correspondence
cc: *Angela Pham, Micah Hale, Dudek*

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SOURCE: RRM Design Group 2024; SANGIS 2023, 2024



Figure 3. Overview of vegetation within project APE, view facing northwest



Figure 4. Overview of dirt trail, view facing north

National Archaeological Database (NADB) Information

Authors:	Keshia Montifolca M.A., RPA and Makayla Murillo, B.A.
Firm:	Dudek
Project Proponent:	RRM Design Group
Report Date:	February 2025
Report Title:	Cultural Resources Phase I Inventory Report for the Fairmount Fire Station Project, City of San Diego, California
Type of Study:	Cultural Resources Inventory
Resources:	None
USGS Quads:	National City, California, Township 16 South, 17 South, Range 2 West, Section 4
Acreage:	1.88
Permit Numbers:	N/A
Keywords:	Pedestrian Survey, Inventory, City of San Diego, Fairmount Ave Fire Station

Confidential Attachment A

SCIC Records Search Results

Attachment B

NAHC Correspondence and Tribal Outreach

From: Makayla Murillo
Sent: Friday, October 27, 2023 1:34 PM
To: NAHC@NAHC
Cc: Angela Pham; Keshia Montifolca
Subject: SLF Request for the Fairmount Avenue Fire Station Project (PN# 11213)
Attachments: Sacred-Lands-File-NA-Contact-Form.pdf

Dear NAHC Staff,

I would like to request a SLF search for the Fairmount Avenue Fire Station Project (PN# 11213). The Project APE is located in the City of San Diego, California. I have attached a record search map and description. Please let me know if you have any questions.

Thank you,
Makayla Murillo
Archaeologist
DUDEK
Work: 760.846.5874
Cell: 760.805.4040
www.dudek.com

Sacred Lands File & Native American Contacts List Request

Native American Heritage Commission

1550 Harbor Blvd, Suite 100

West Sacramento, CA 95691

916-373-3710

916-373-5471 – Fax

nahc@nahc.ca.gov

Information Below is Required for a Sacred Lands File Search

Project: Fairmount Fire Station (PN# 11213)

County: San Diego County

USGS Quadrangle Name: 7.5-Minute Series National City Quadrangle

Township: 16S 17S **Range:** 2W **Section(s):** 3, 4, 5, 8, 9, 32-34

Company/Firm/Agency: Dudek

Street Address: 605 Third Street

City: Encinitas **Zip:** 92024

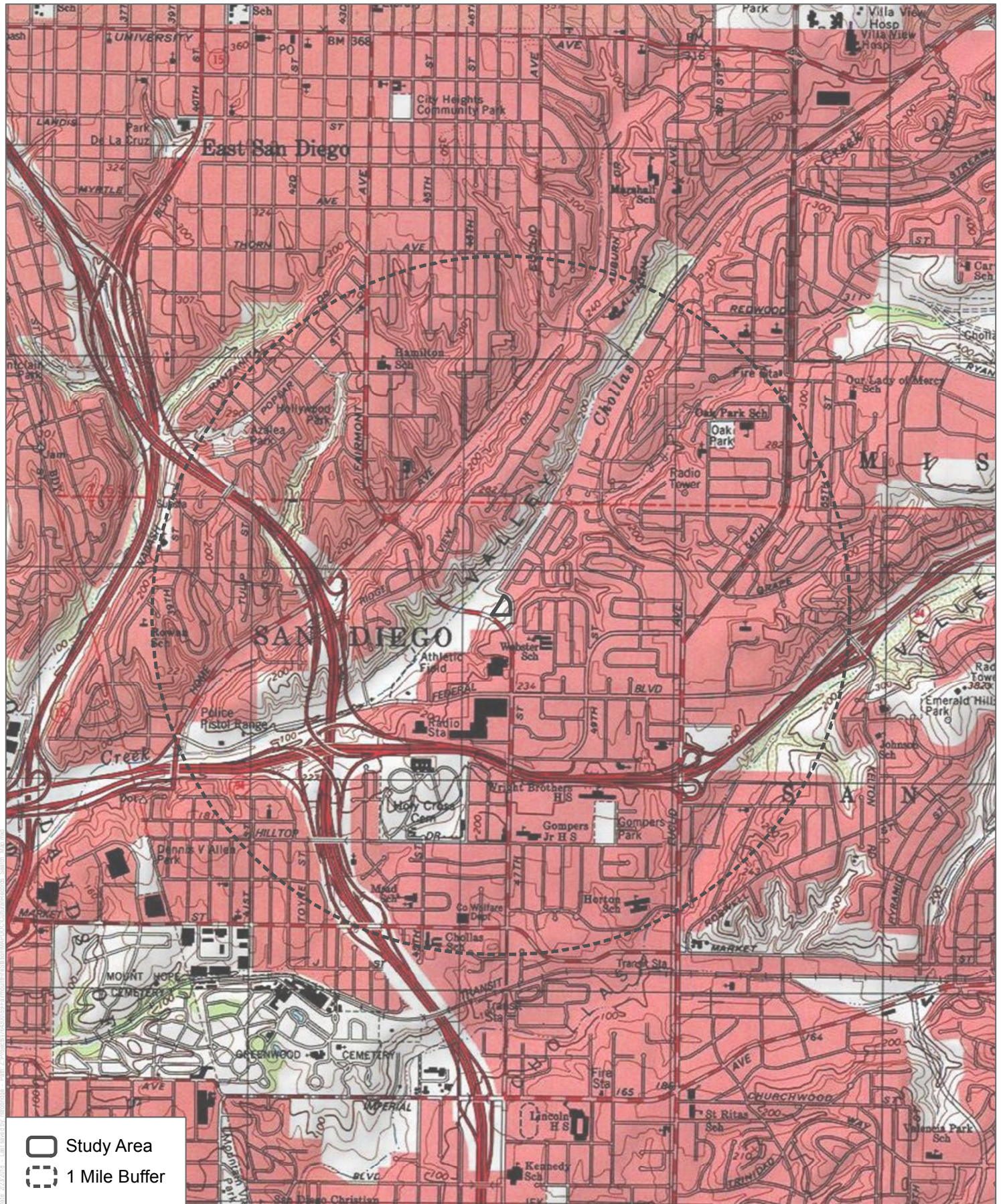
Phone: 760.479.4827

Fax: 760.632.0164

Email: mmurillo@dudek.com & apham@dudek.com

Project Description:

The Project proposes to develop a fire station and parking lot totalling in 1.28-acres. The Project APE is located north of the intersection 47th Street and Fairmount Avenue, City of San Diego, California and the Accessor's Parcel Number (APN) is 541-190-16.



SOURCE: USGS 7.5-Minute Series National City Quadrangle
 Township 16S, 17S; Range 2W; Sections 3, 4, 5, 8, 9, 10, 32, 33, 34





NATIVE AMERICAN HERITAGE COMMISSION

November 27, 2023

Makayla Murillo
Dudek

Via Email to: mmurillo@dudek.com

CHAIRPERSON
Reginald Pagaling
Chumash

VICE-CHAIRPERSON
Buffy McQuillen
Yokayo Pomo, Yuki,
Nomlaki

SECRETARY
Sara Dutschke
Miwok

PARLIAMENTARIAN
Wayne Nelson
Luiseño

COMMISSIONER
Isaac Bojorquez
Ohlone-Costanoan

COMMISSIONER
Stanley Rodriguez
Kumeyaay

COMMISSIONER
Laurena Bolden
Serrano

COMMISSIONER
Reid Milanovich
Cahuilla

COMMISSIONER
Vacant

EXECUTIVE SECRETARY
**Raymond C.
Hitchcock**
Miwok, Nisenan

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710

Re: Fairmount Fire Station (PN# 11213) Project, San Diego County

Dear Ms. Murillo:

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

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

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

If you have any questions or need additional information, please contact me at my email address: Pricilla.Torres-Fuentes@nahc.ca.gov.

Sincerely,

Pricilla Torres-Fuentes

Pricilla Torres-Fuentes
Cultural Resources Analyst

Attachment

Native American Heritage Commission
Native American Contact List
San Diego County
11/27/2023

County	Tribe Name	Fed (F) Non-Fed (N)	Contact Person	Contact Address	Phone #	Fax #	Email Address	Cultural Affiliation	Counties	Last Updated
San Diego	Barona Group of the Capitan Grande	F	Art Bunce, Attorney		(760) 489-0329		buncelaw@aol.com	Diegueno	Imperial, San Diego	7/25/2023
	Campo Band of Diegueno Mission Indians	F	Ralph Goff, Chairperson	36190 Church Road, Suite 1 Campo, CA, 91906	(619) 478-9046	(619) 478-5818	rgoff@campo-nsn.gov	Diegueno	Imperial, Orange, Riverside, San Diego	
	Ewiaapaayp Band of Kumeyaay Indians	F	Michael Garcia, Vice Chairperson	4054 Willows Road Alpine, CA, 91901	(619) 933-2200	(619) 445-9126	michaelg@leaningrock.net	Diegueno	Imperial, Orange, Riverside, San Diego	
	Ewiaapaayp Band of Kumeyaay Indians	F	Robert Pinto, Chairperson	4054 Willows Road Alpine, CA, 91901	(619) 368-4382	(619) 445-9126	ceo@ebki-nsn.gov	Diegueno	Imperial, Orange, Riverside, San Diego	
	Iipay Nation of Santa Ysabel	F	Virgil Perez, Chairperson	P.O. Box 130 Santa Ysabel, CA, 92070	(760) 765-0845	(760) 765-0320		Diegueno	Imperial, San Diego	
	Iipay Nation of Santa Ysabel	F	Clint Linton, Director of Cultural Resources	P.O. Box 507 Santa Ysabel, CA, 92070	(760) 803-5694		clint@redtailenvironmental.com	Diegueno	Imperial, San Diego	
	Inaja-Cosmit Band of Indians	F	Rebecca Osuna, Chairperson	2005 S. Escondido Blvd. Escondido, CA, 92025	(760) 737-7628	(760) 747-8568		Diegueno	Imperial, San Diego	
	Jamul Indian Village	F	Lisa Cumper, Tribal Historic Preservation Officer	P.O. Box 612 Jamul, CA, 91935	(619) 669-4855		lcumper@jiv-nsn.gov	Diegueno	Imperial, San Diego	9/5/2018
	Jamul Indian Village	F	Erica Pinto, Chairperson	P.O. Box 612 Jamul, CA, 91935	(619) 669-4785	(619) 669-4817	epinto@jiv-nsn.gov	Diegueno	Imperial, San Diego	
	Kwaaymii Laguna Band of Mission Indians	N	Carmen Lucas,	P.O. Box 775 Pine Valley, CA, 91962	(619) 709-4207			Kwaaymii Diegueno	Imperial, San Diego	6/20/2023
	La Posta Band of Diegueno Mission Indians	F	Gwendolyn Parada, Chairperson	8 Crestwood Road Boulevard, CA, 91905	(619) 478-2113	(619) 478-2125	LP13boots@aol.com	Diegueno	Imperial, Orange, Riverside, San Diego	
	Manzanita Band of Kumeyaay Nation	F	Angela Elliott Santos, Chairperson	P.O. Box 1302 Boulevard, CA, 91905	(619) 766-4930	(619) 766-4957		Diegueno	Imperial, Orange, Riverside, San Diego	
	Mesa Grande Band of Diegueno Mission Indians	F	Michael Linton, Chairperson	P.O. Box 270 Santa Ysabel, CA, 92070	(760) 782-3818	(760) 782-9092	mesagrandeband@msn.com	Diegueno	Imperial, Orange, Riverside, San Diego	
	San Pasqual Band of Diegueno Mission Indians	F	Allen Lawson, Chairperson	P.O. Box 365 Valley Center, CA, 92082	(760) 749-3200	(760) 749-3876	allenl@sanpasqualtribe.org	Diegueno	Imperial, San Diego	

**Native American Heritage Commission
Native American Contact List
San Diego County
11/27/2023**

San Pasqual Band of Diegueno Mission Indians	F	John Flores, Environmental Coordinator	P. O. Box 365 Valley Center, CA, 92082	(760) 749-3200	(760) 749-3876	johnf@sanpasqualtribe.org	Diegueno	Imperial, San Diego	8/16/2016
Sycuan Band of the Kumeyaay Nation	F	Cody Martinez, Chairman	Sycuan Tribal Office: 1 Kwaaypaay Court El Cajon, CA, 92019	(619) 445-2613		cmartinez@sycuan-nsn.gov	Kumeyaay	Imperial, San Diego	8/7/2023
Sycuan Band of the Kumeyaay Nation	F	Bernice Paipa, Cultural Resource Specialist	Sycuan Cultural Center: 910 Willow Glen Drive El Cajon, CA, 92019	(619) 445-6917		bpai2@sycuan-nsn.gov	Kumeyaay	Imperial, San Diego	8/7/2023
Viejas Band of Kumeyaay Indians	F	Ernest Pingleton, THPO	1 Viejas Grade Road Alpine, CA, 91901	(619) 445-3810		epingleton@viejas-nsn.gov	Kumeyaay	Imperial, San Diego	6/29/2023
Viejas Band of Kumeyaay Indians	F	Ray Teran, Resource Management Director	1 Viejas Grade Road Alpine, CA, 91901	(619) 659-2312		rteran@viejas-nsn.gov	Kumeyaay	Imperial, San Diego	6/29/2023

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

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Fairmount Fire Station (PN# 11213) Project, San Diego County.

Record: PROJ-2023-005662
Report Type: List of Tribes
Counties: San Diego
NAHC Group: All

November 29, 2023

11213

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

Subject: Information Request for the Fairmount Avenue Fire Station Project, City of San Diego, California

Dear Mr. Romero,

The Fairmount Avenue Fire Station Project (project) is located on a 1.28-acre site at the corner of Fairmount Avenue and 47th Street in the Mid-City/City Heights Community Plan area in the City of San Diego, California (Figure 1). This project APE falls on Section 4, Township 17 South, Range 2 West in the National City U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

As part of the cultural resources study prepared for the proposed project, Dudek contacted the Native American Heritage Commission (NAHC) conducted a Sacred Lands file (SLF) search and a list of Native American individuals and/or tribal organizations who may have knowledge of cultural resources in or near the proposed project APE. The NAHC emailed a response on November 27, 2023, which stated that the SLF search did not identify the presence of Native American cultural resources in the immediate project APE.

Please note that this letter does not constitute Assembly Bill (AB) 52 notification or initiation of consultation. Tribes that wish to be notified of projects for the purposes of consultation must contact the lead agency, City of San Diego (City), in writing (pursuant to Public Resources Code Section 21080.3.1 (b)).

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

Respectfully,



Makayla Murillo, B.A.
Archaeologist
DUDEK
Phone: (760) 846-5874
Email: mmurillo@dudek.com

Attachments: Figure 1. Regional project location map.

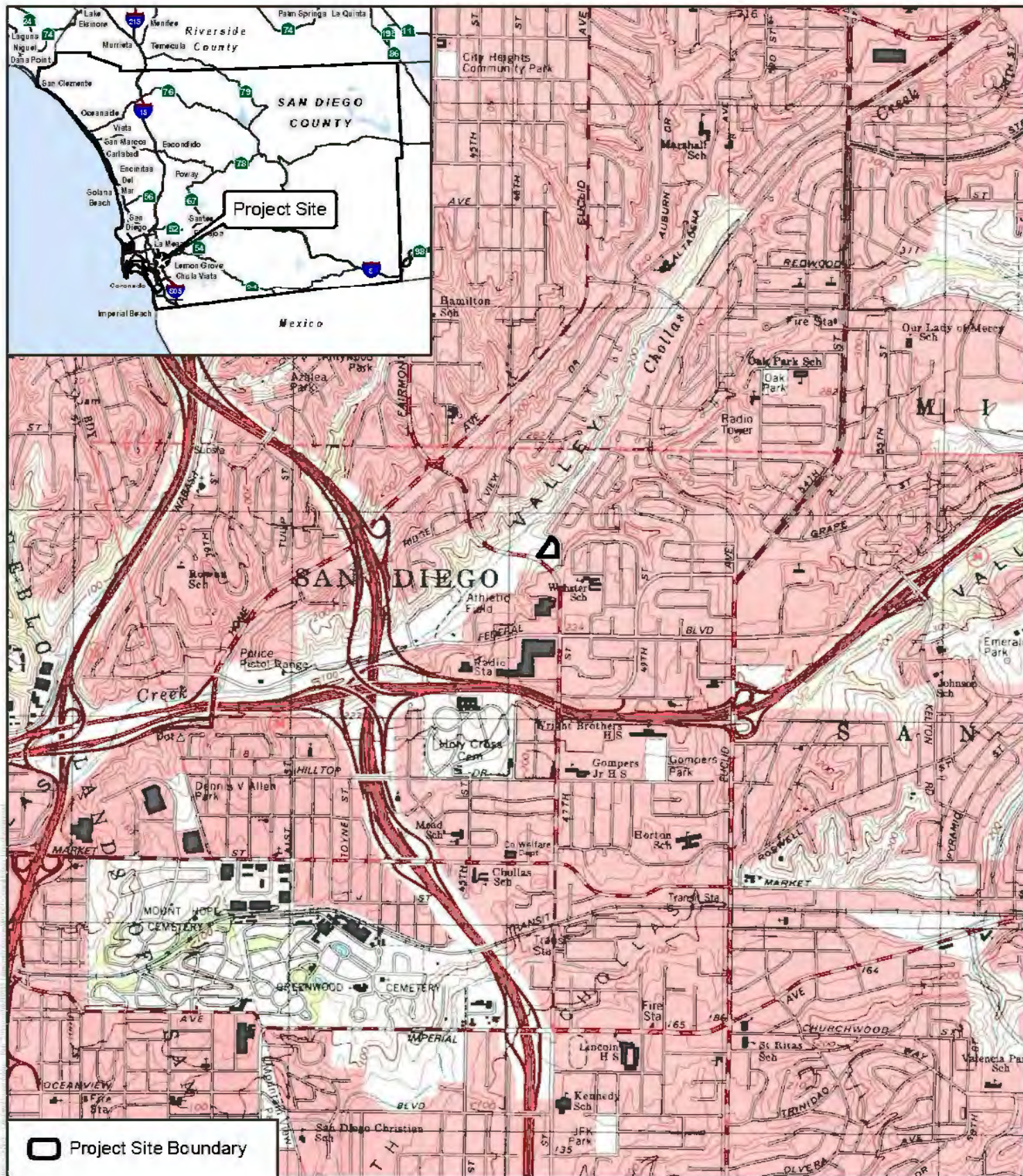


FIGURE 1
Project Location
Fairmount Fire Station

November 29, 2023

11213

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

Subject: Information Request for the Fairmount Avenue Fire Station Project, City of San Diego, California

Dear Mr. Goff,

The Fairmount Avenue Fire Station Project (project) is located on a 1.28-acre site at the corner of Fairmount Avenue and 47th Street in the Mid-City/City Heights Community Plan area in the City of San Diego, California (Figure 1). This project APE falls on Section 4, Township 17 South, Range 2 West in the National City U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

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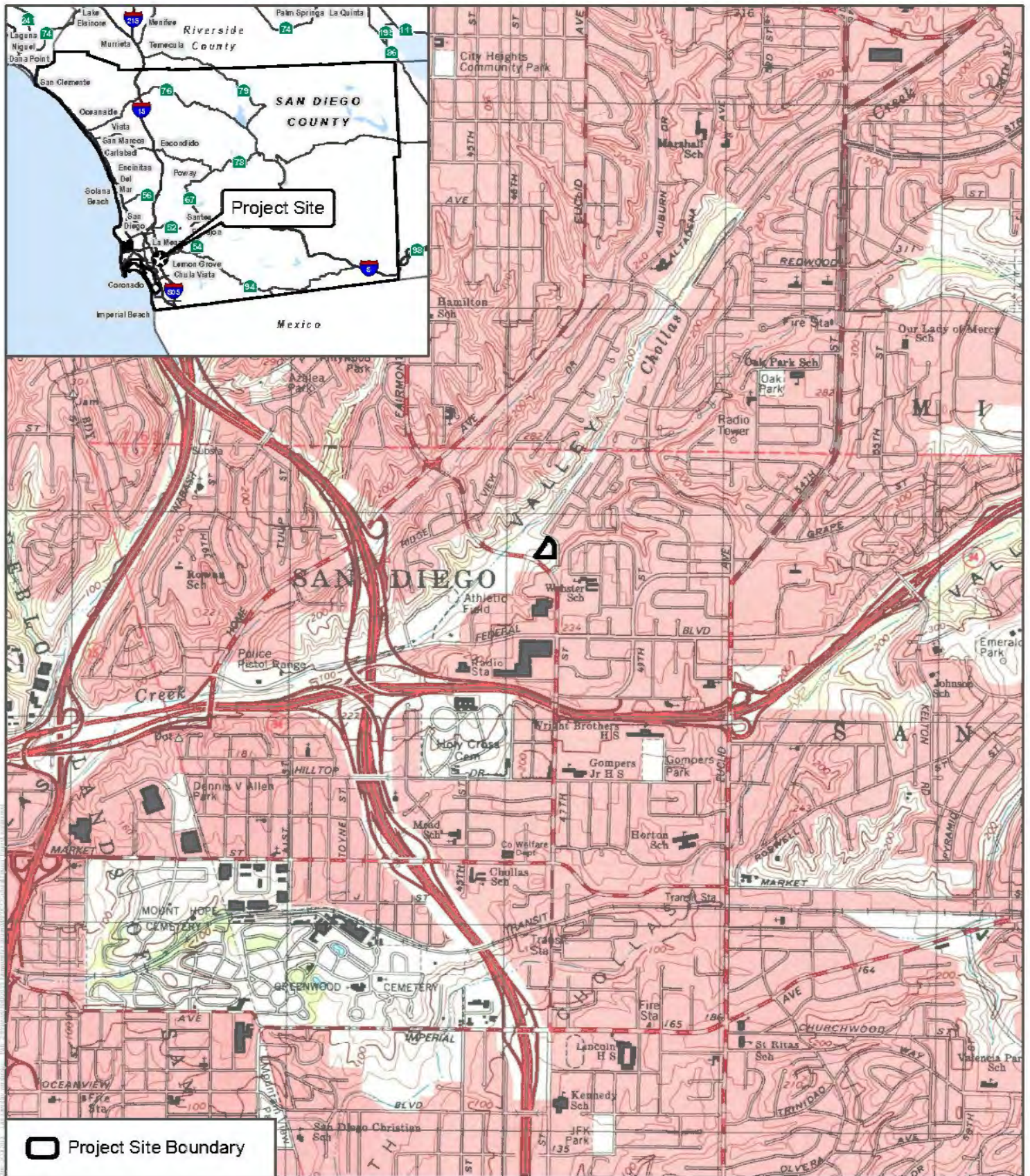
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SOURCE: USGS 7.5-Minute Series National City Quadangle(s)
Township 17S/Range 2W/Section 04

DUDEK 0 1,000 2,000 Feet

November 29, 2023

11213

Mr. Robert Pinto, Chairperson
Ewiaapaayp Band of Kumeyaay Indians
4054 Willow Rd.
Alpine, CA 91901

Subject: Information Request for the Fairmount Avenue Fire Station Project, City of San Diego, California

Dear Mr. Pinto,

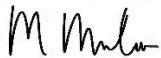
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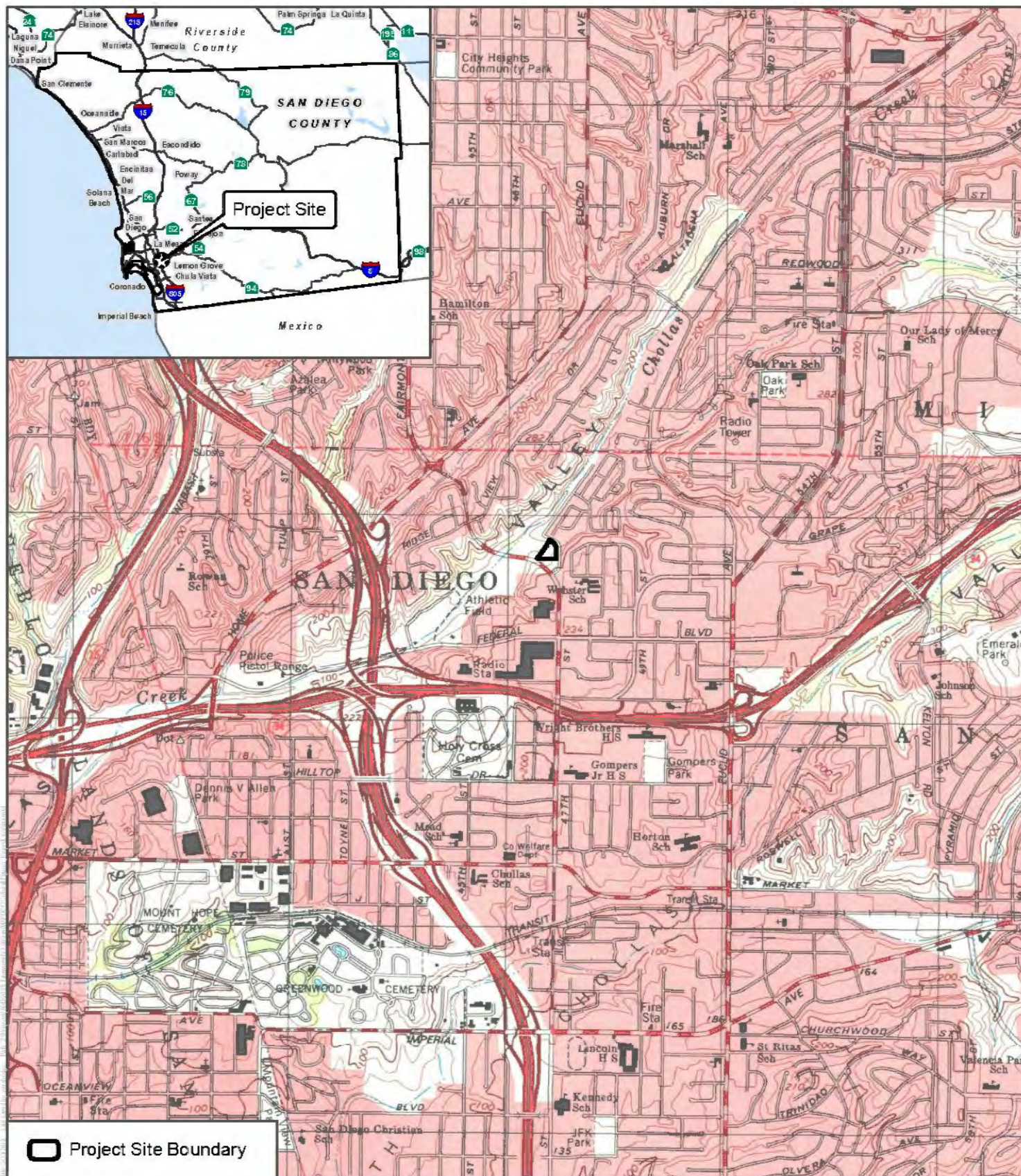


FIGURE 1
Project Location
Fairmount Fire Station

November 29, 2023

11213

Mr. Michael Garcia, Vice Chairperson
Ewiiapaayp Band of Kumeyaay Indians
4054 Willows Road
Alpine, CA 91901

Subject: Information Request for the Fairmount Avenue Fire Station Project, City of San Diego, California

Dear Mr. Garcia,

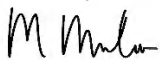
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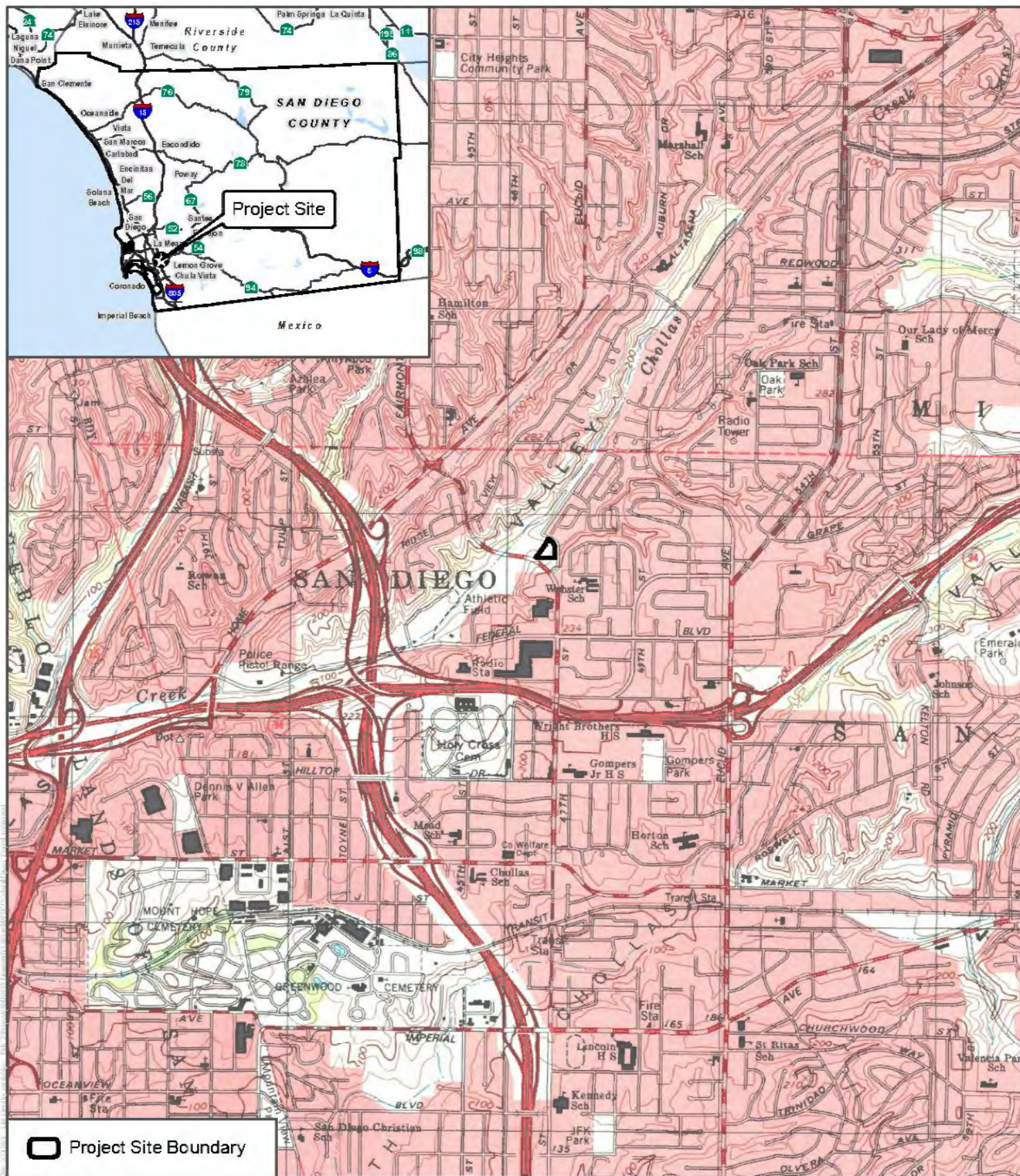
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MAIN OFFICE
605 THIRD STREET
ENCINITAS, CALIFORNIA 92024
T 800.450.1818 F 760.632.0164

November 29, 2023

11213

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

Subject: Information Request for the Fairmount Avenue Fire Station Project, City of San Diego, California

Dear Mr. Perez,

The Fairmount Avenue Fire Station Project (project) is located on a 1.28-acre site at the corner of Fairmount Avenue and 47th Street in the Mid-City/City Heights Community Plan area in the City of San Diego, California (Figure 1). This project APE falls on Section 4, Township 17 South, Range 2 West in the National City U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

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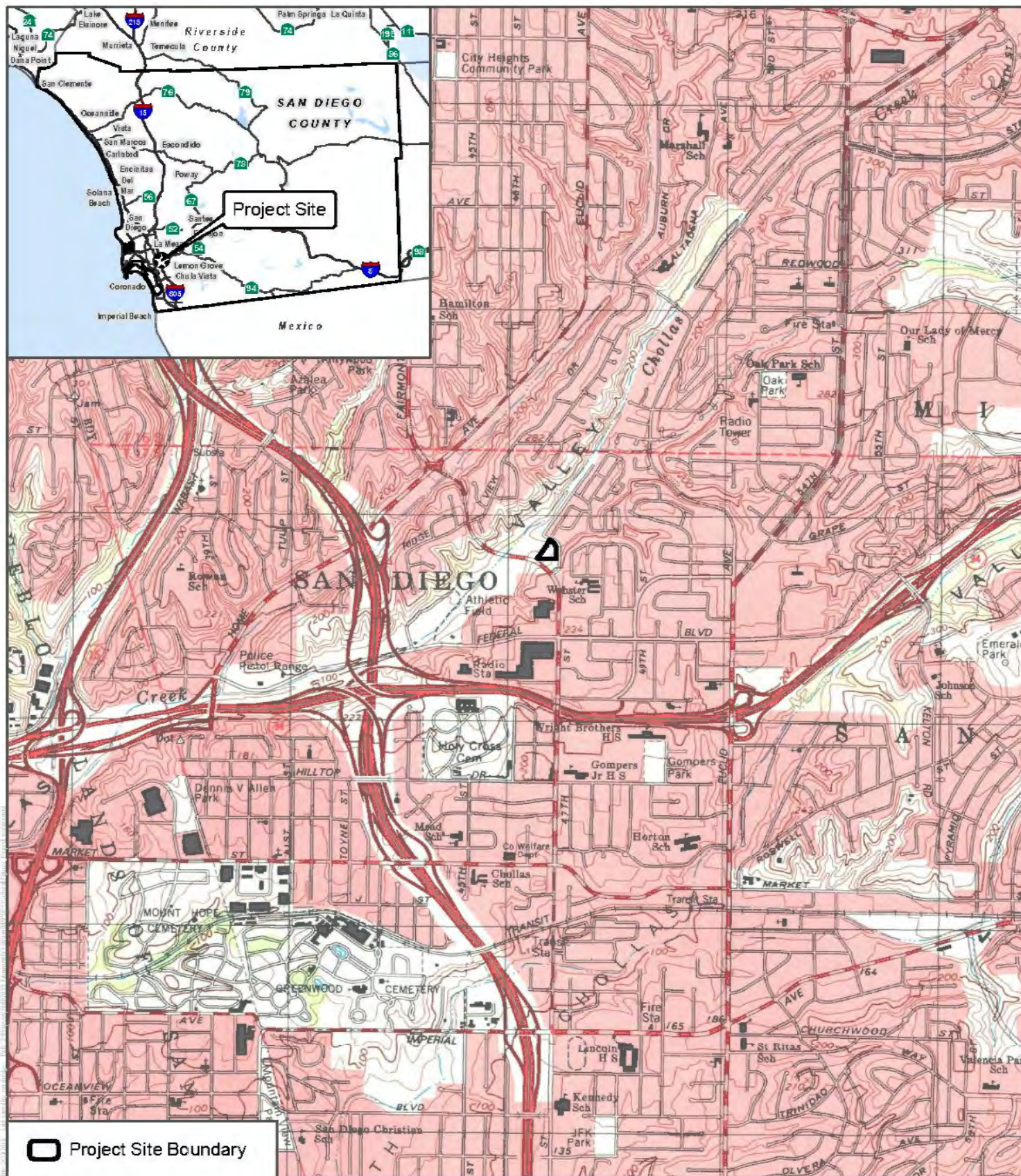
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SOURCE: USGS 7.5-Minute Series National City Quadangle(s)
Township 17S/Range 2W/Section 04

DUDEK  0 1,000 2,000 Feet

November 29, 2023

11213

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

Subject: Information Request for the Fairmount Avenue Fire Station Project, City of San Diego, California

Dear Ms. Osuna,

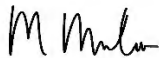
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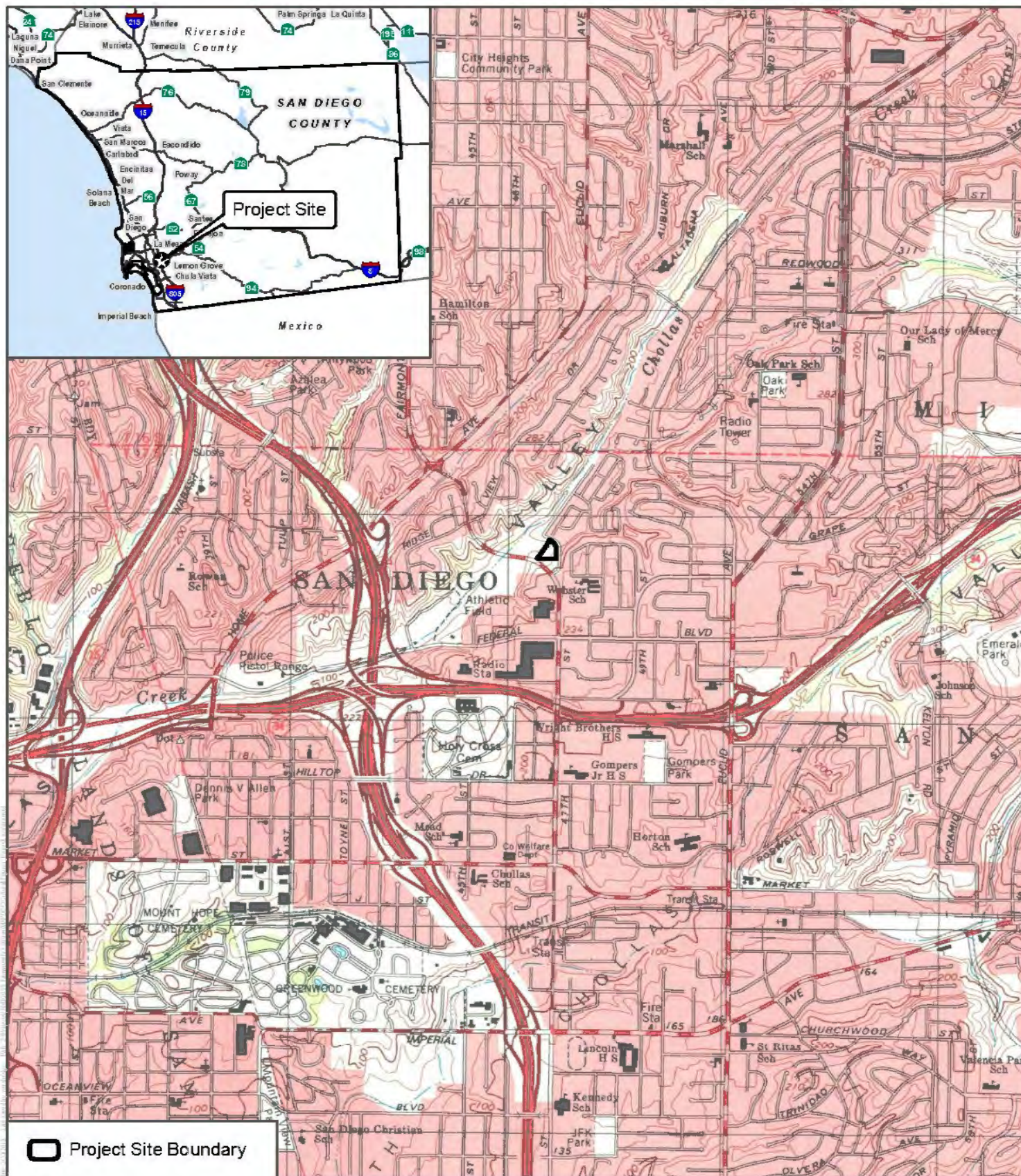
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Makayla Murillo, B.A.
Archaeologist
DUDEK
Phone: (760) 846-5874
Email: mmurillo@dudek.com

Attachments: Figure 1. Regional project location map.



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

Subject: Information Request for the Fairmount Avenue Fire Station Project, City of San Diego, California

Dear Mr. Linton,

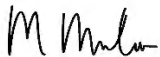
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Attachments: Figure 1. Regional project location map.

November 29, 2023

11213

Ms. Lisa Cumper, THPO
Jamul Indian Village
P.O. Box 612
Jamul, CA 91935

Subject: Information Request for the Fairmount Avenue Fire Station Project, City of San Diego, California

Dear Ms. Cumper,

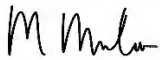
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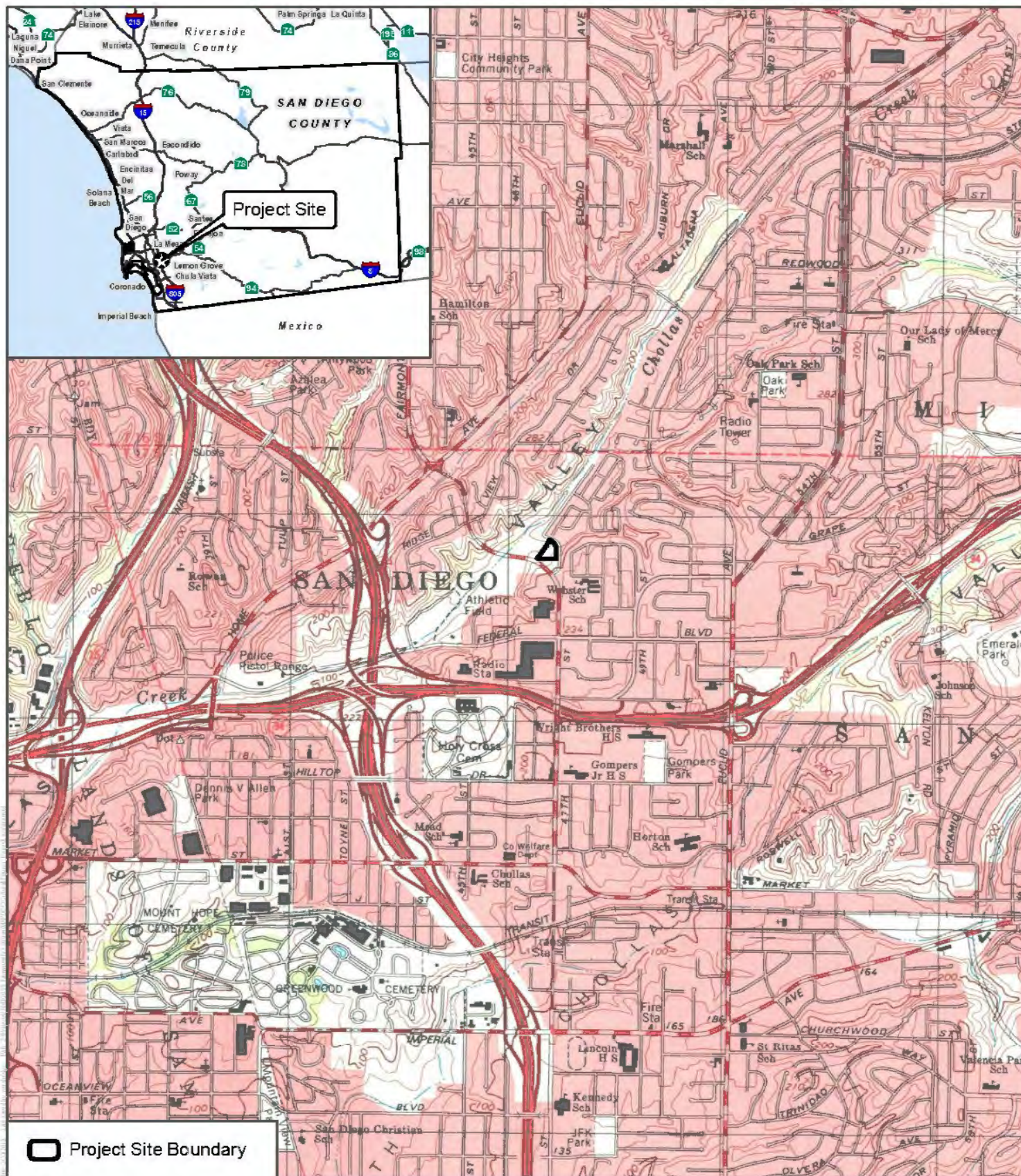
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Attachments: Figure 1. Regional project location map.



SOURCE: USGS 7.5-Minute Series National City Quadangle(s)
Township 17S/Range 2W/Section 04

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

November 29, 2023

11213

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

Subject: Information Request for the Fairmount Avenue Fire Station Project, City of San Diego, California

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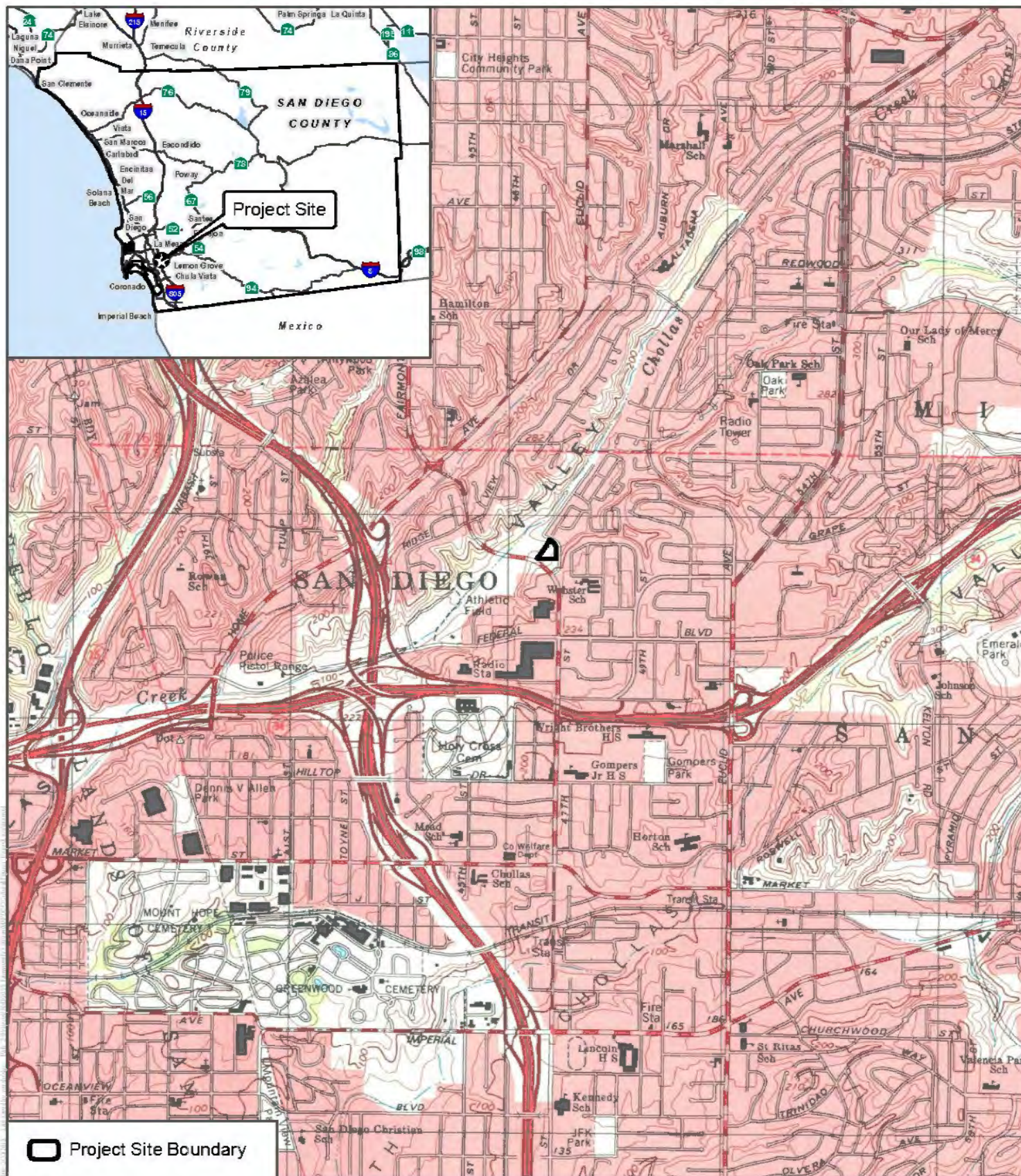
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Attachments: Figure 1. Regional project location map.



November 29, 2023

11213

Ms. Bernice Paipa, Vice Spokesperson
Kumeyaay Cultural Repatriation Committee
P.O. Box 63
Santa Ysabel, CA 92070

Subject: Information Request for the Fairmount Avenue Fire Station Project, City of San Diego, California

Dear Ms. Paipa,

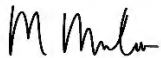
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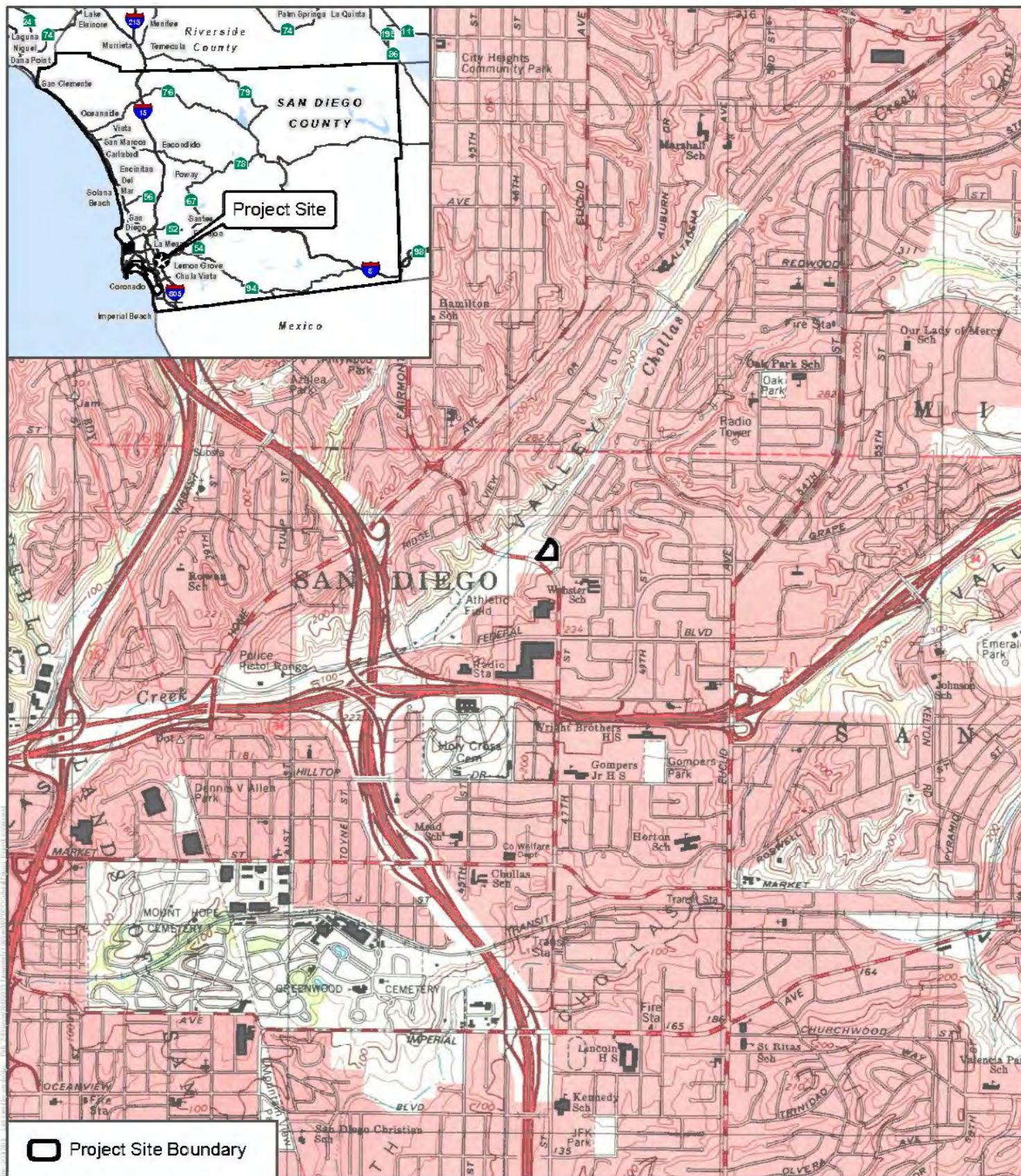
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Feet



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

November 29, 2023

11213

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

Subject: Information Request for the Fairmount Avenue Fire Station Project, City of San Diego, California

Dear Ms. Lucas,

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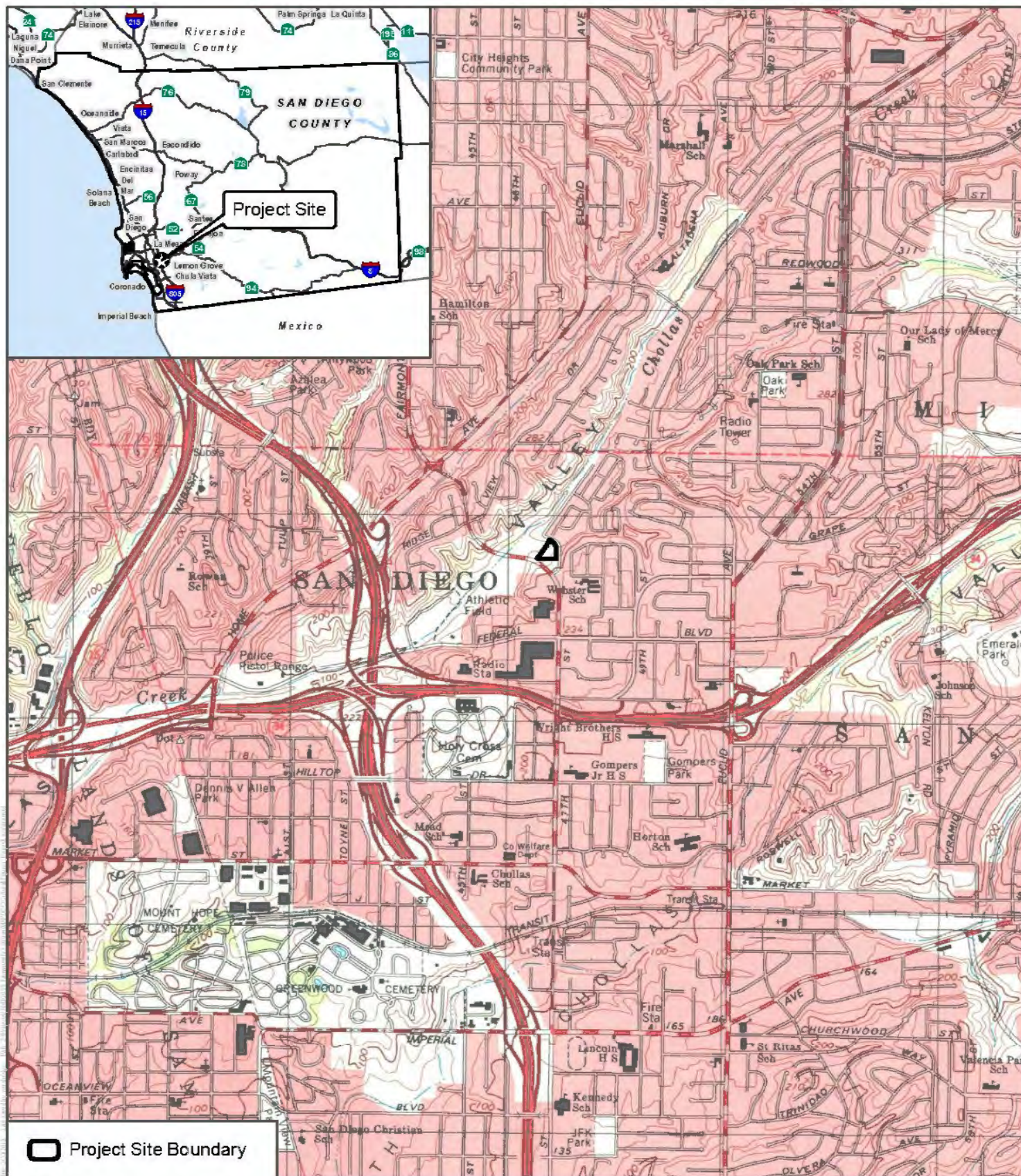


FIGURE 1
Project Location
Fairmount Fire Station

November 29, 2023

11213

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

Subject: Information Request for the Fairmount Avenue Fire Station Project, City of San Diego, California

Dear Ms. Parada,

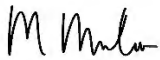
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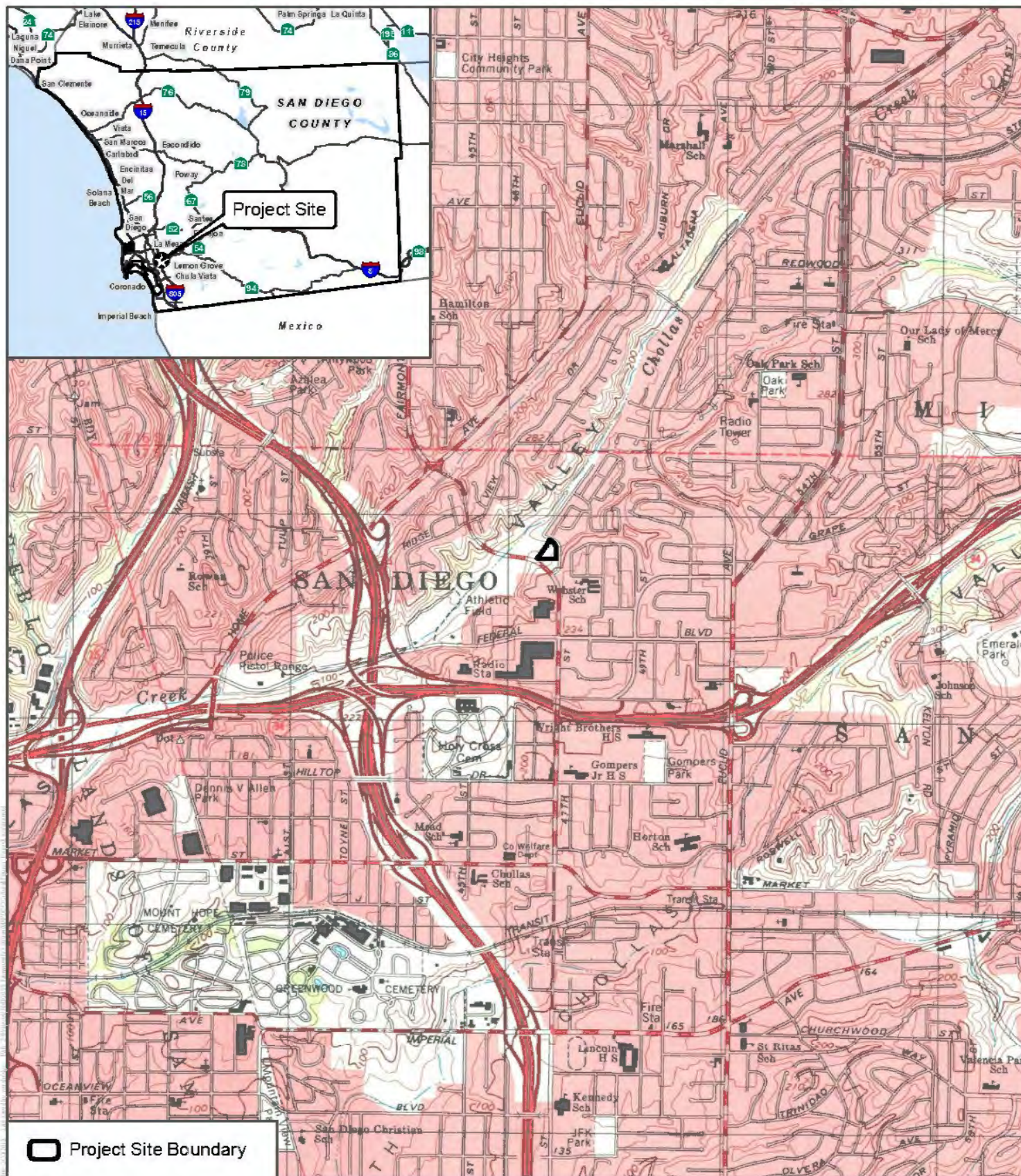
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MAIN OFFICE
605 THIRD STREET
ENCINITAS, CALIFORNIA 92024
T 800.450.1818 F 760.632.0164

November 29, 2023

11213

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

Subject: Information Request for the Fairmount Avenue Fire Station Project, City of San Diego, California

Dear Ms. Santos,

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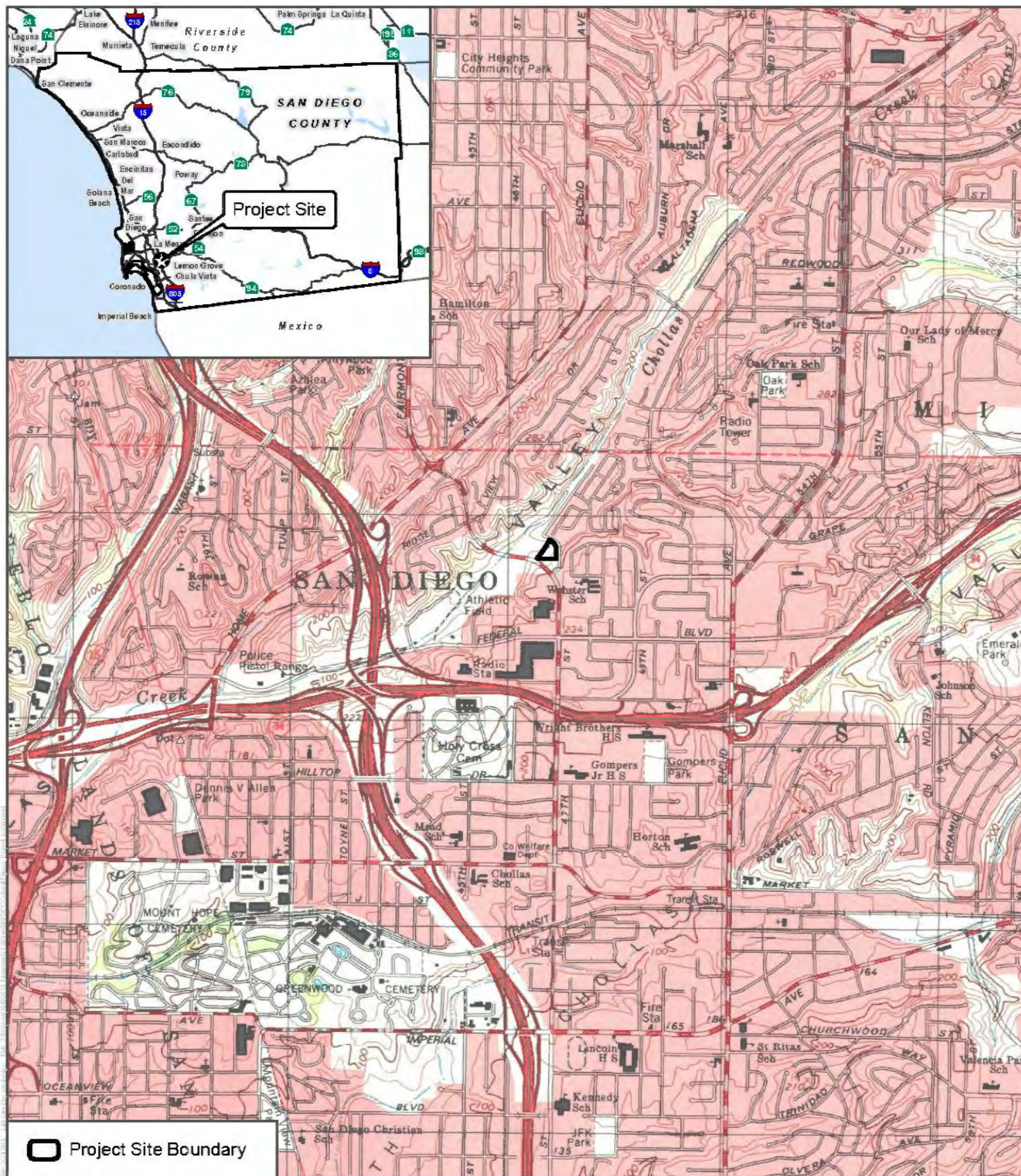
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Archaeologist
DUDEK
Phone: (760) 846-5874
Email: mmurillo@dudek.com

Attachments: Figure 1. Regional project location map.





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

November 29, 2023

11213

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

Subject: Information Request for the Fairmount Avenue Fire Station Project, City of San Diego, California

Dear Mr. Linton,

The Fairmount Avenue Fire Station Project (project) is located on a 1.28-acre site at the corner of Fairmount Avenue and 47th Street in the Mid-City/City Heights Community Plan area in the City of San Diego, California (Figure 1). This project APE falls on Section 4, Township 17 South, Range 2 West in the National City U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

As part of the cultural resources study prepared for the proposed project, Dudek contacted the Native American Heritage Commission (NAHC) conducted a Sacred Lands file (SLF) search and a list of Native American individuals and/or tribal organizations who may have knowledge of cultural resources in or near the proposed project APE. The NAHC emailed a response on November 27, 2023, which stated that the SLF search did not identify the presence of Native American cultural resources in the immediate project APE.

Please note that this letter does not constitute Assembly Bill (AB) 52 notification or initiation of consultation. Tribes that wish to be notified of projects for the purposes of consultation must contact the lead agency, City of San Diego (City), in writing (pursuant to Public Resources Code Section 21080.3.1 (b)).

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

Respectfully,

Makayla Murillo, B.A.
Archaeologist
DUDEK
Phone: (760) 846-5874
Email: mmurillo@dudek.com

Attachments: Figure 1. Regional project location map.

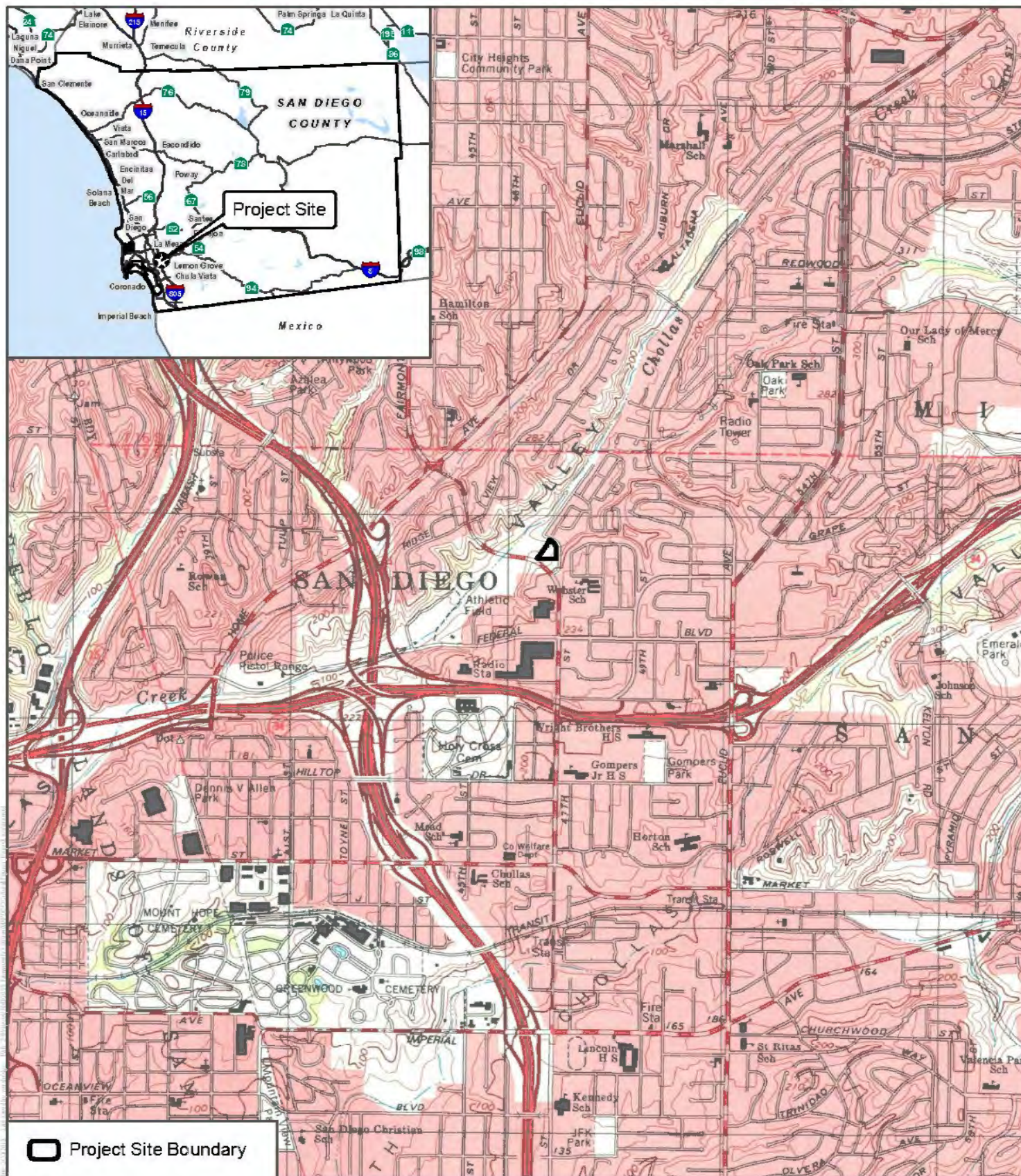


FIGURE 1
Project Location
Fairmount Fire Station



MAIN OFFICE
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ENCINITAS, CALIFORNIA 92024
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November 29, 2023

11213

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

Subject: Information Request for the Fairmount Avenue Fire Station Project, City of San Diego, California

Dear Mr. Flores,

The Fairmount Avenue Fire Station Project (project) is located on a 1.28-acre site at the corner of Fairmount Avenue and 47th Street in the Mid-City/City Heights Community Plan area in the City of San Diego, California (Figure 1). This project APE falls on Section 4, Township 17 South, Range 2 West in the National City U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

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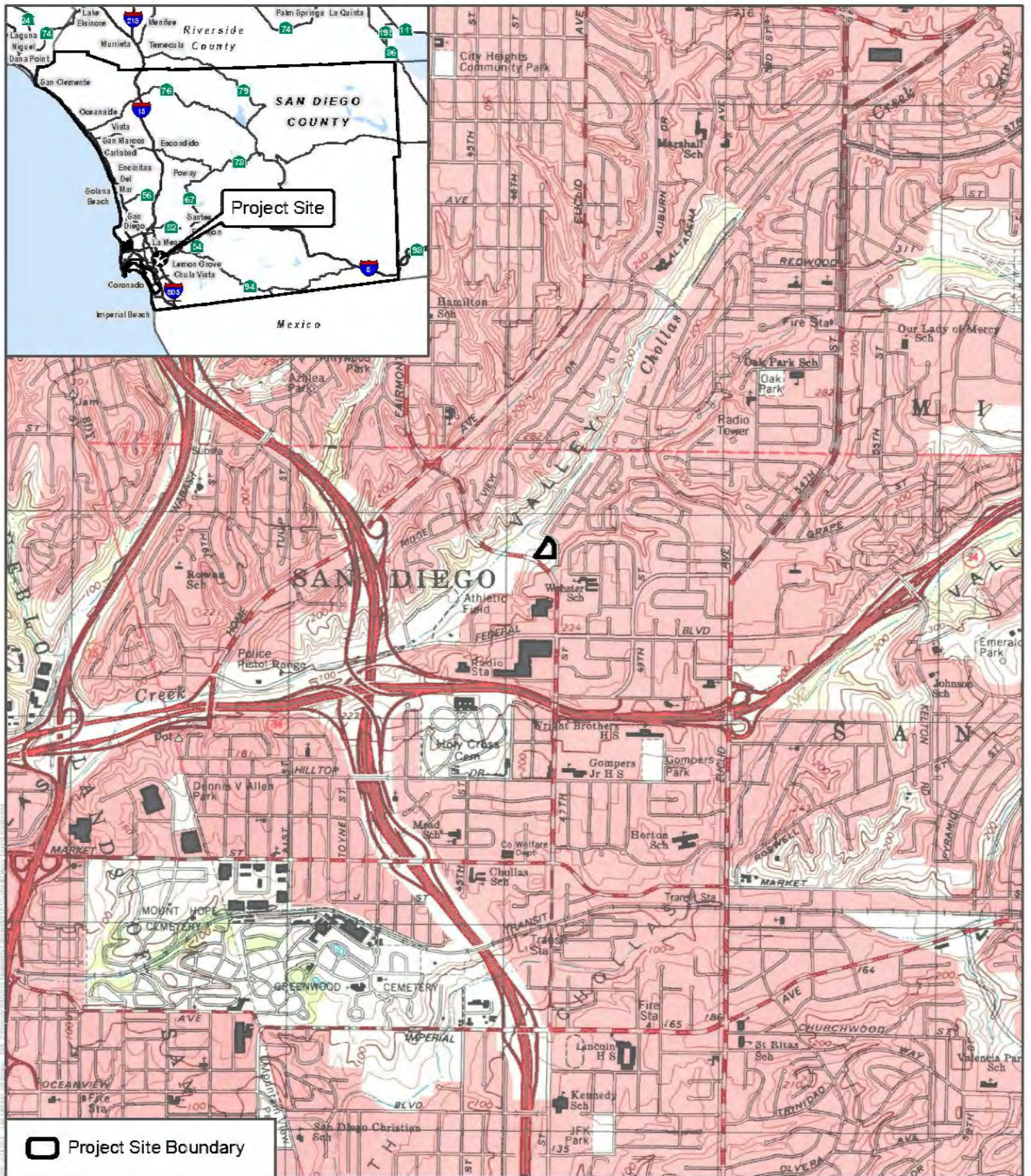
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MAIN OFFICE
605 THIRD STREET
ENCINITAS, CALIFORNIA 92024
T 800.450.1818 F 760.632.0164

November 29, 2023

11213

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

Subject: Information Request for the Fairmount Avenue Fire Station Project, City of San Diego, California

Dear Mr. Lawson,

The Fairmount Avenue Fire Station Project (project) is located on a 1.28-acre site at the corner of Fairmount Avenue and 47th Street in the Mid-City/City Heights Community Plan area in the City of San Diego, California (Figure 1). This project APE falls on Section 4, Township 17 South, Range 2 West in the National City U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

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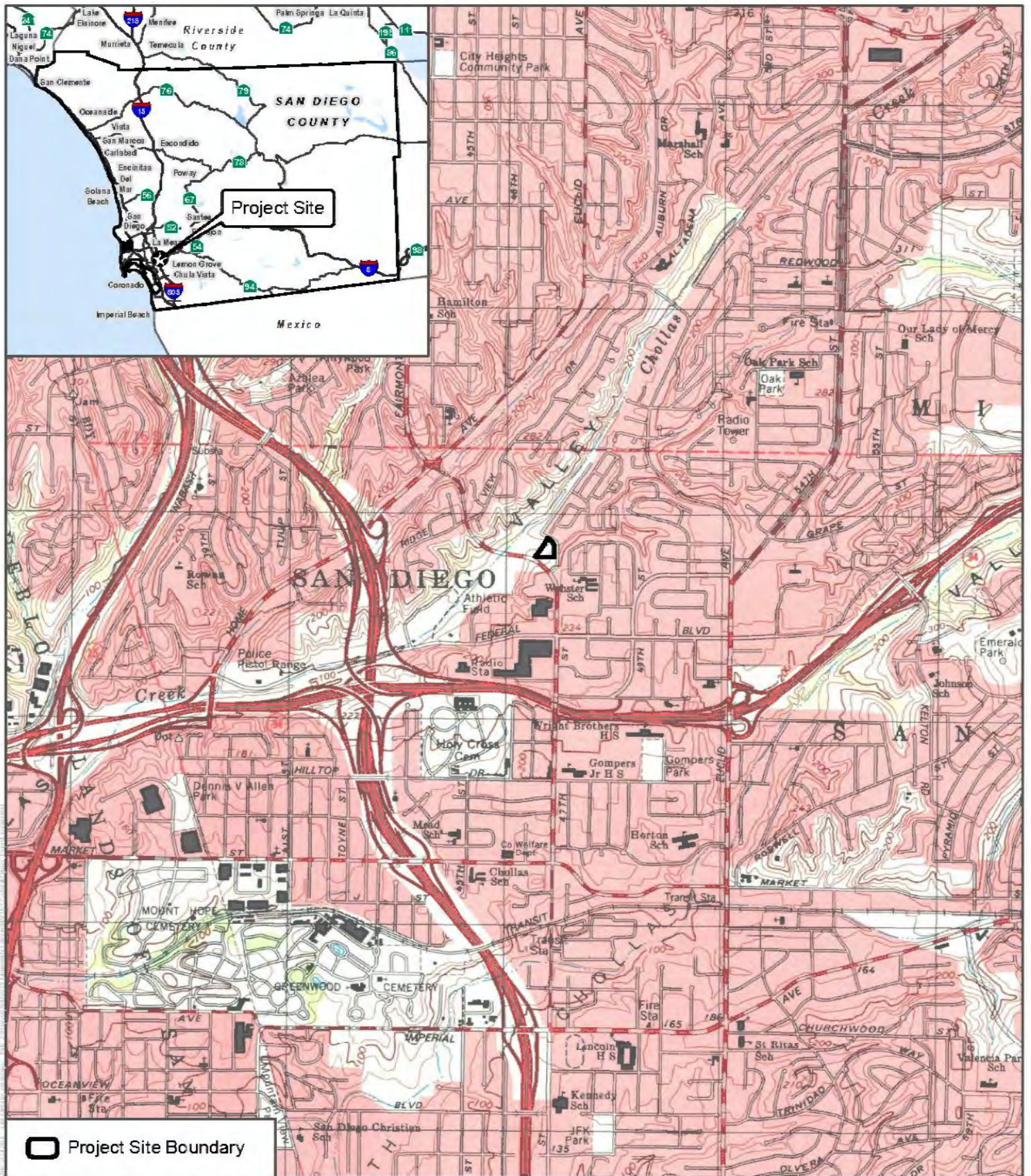
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Makayla Murillo, B.A.
Archaeologist
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Phone: (760) 846-5874
Email: mmurillo@dudek.com

Attachments: Figure 1. Regional project location map.



SOURCE: USGS 7.5-Minute Series National City Quadangle(s)
Township 17S/Range 2W/Section 04

DUDEK



0 1,000 2,000
Feet

FIGURE 1
Project Location
Fairmount Fire Station

November 29, 2023

11213

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

Subject: Information Request for the Fairmount Avenue Fire Station Project, City of San Diego, California

Dear Mr. Martinez,

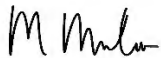
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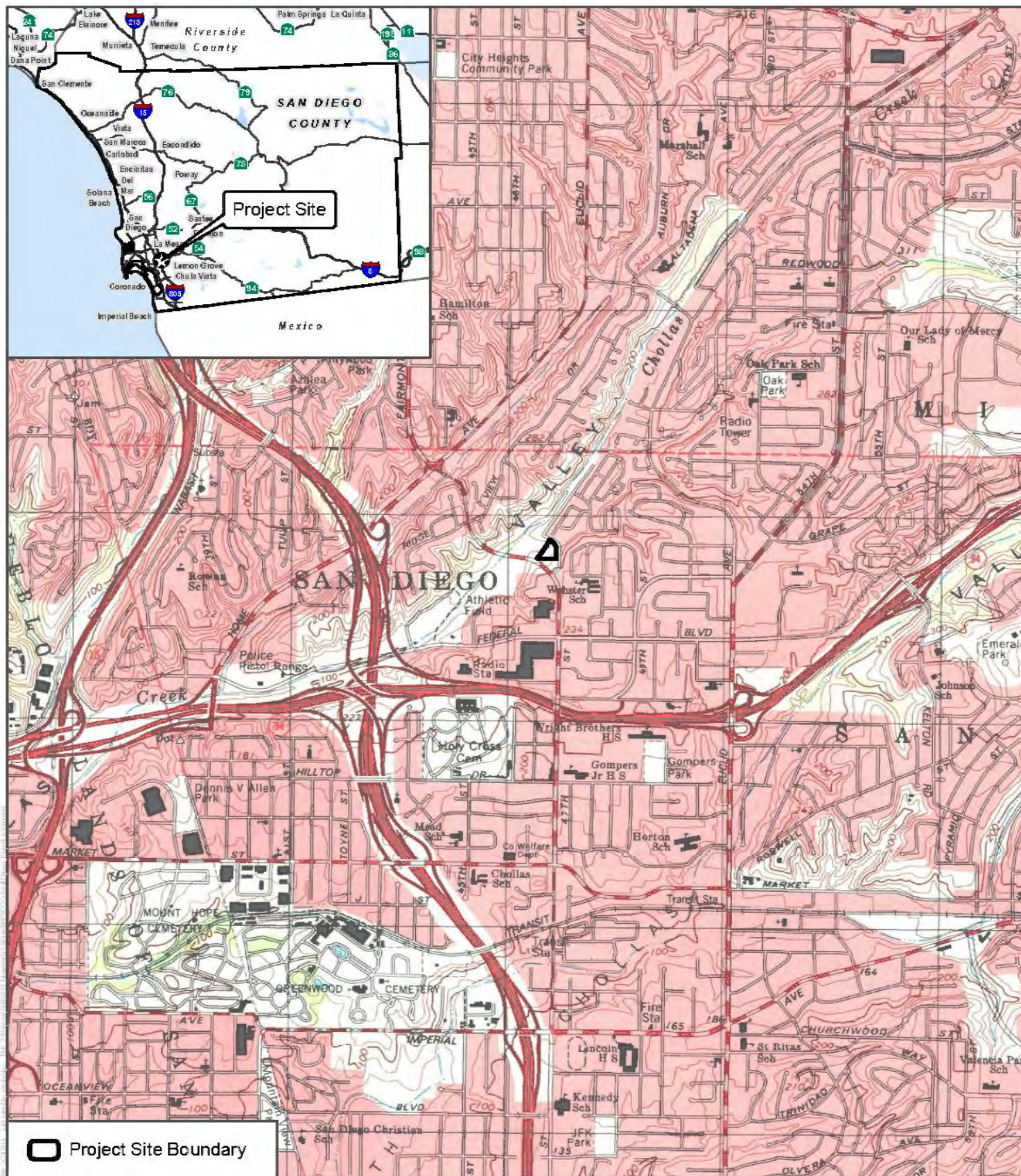
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Makayla Murillo, B.A.
Archaeologist
DUDEK
Phone: (760) 846-5874
Email: mmurillo@dudek.com

Attachments: Figure 1. Regional project location map.



November 29, 2023

11213

Mr. Ray Teran, Resource Manager
Viejas Band of Kumeyaay Indians
1 Viejas Grade Rd.
Alpine, CA 91901

Subject: Information Request for the Fairmount Avenue Fire Station Project, City of San Diego, California

Dear Mr. Teran,

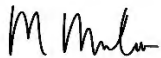
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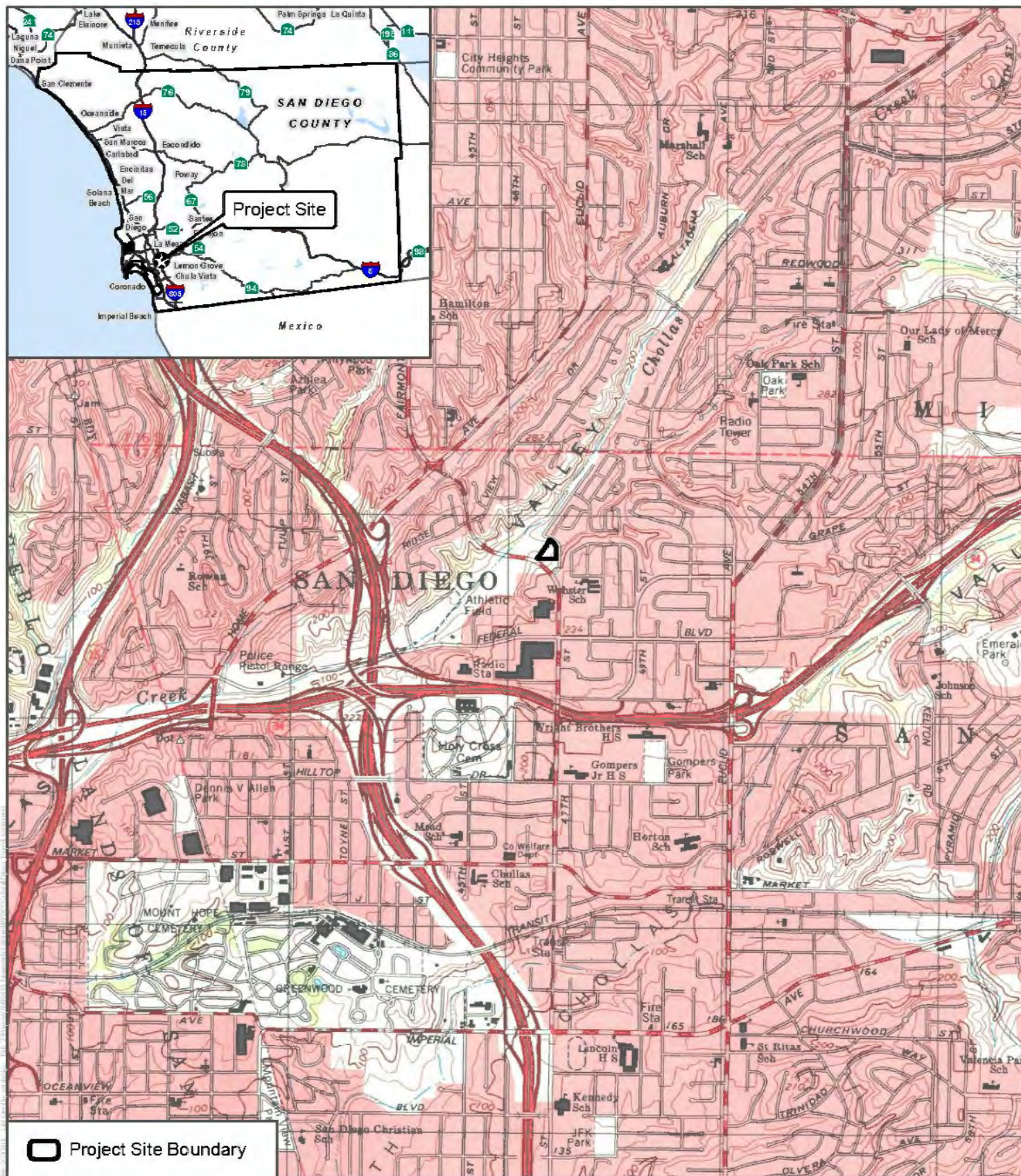
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Attachments: Figure 1. Regional project location map.



SOURCE: USGS 7.5-Minute Series National City Quadangle(s)
Township 17S/Range 2W/Section 04

DUDEK 0 1,000 2,000 Feet

November 29, 2023

11213

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

Subject: Information Request for the Fairmount Avenue Fire Station Project, City of San Diego, California

Dear Mr. Pingleton,

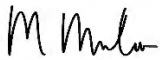
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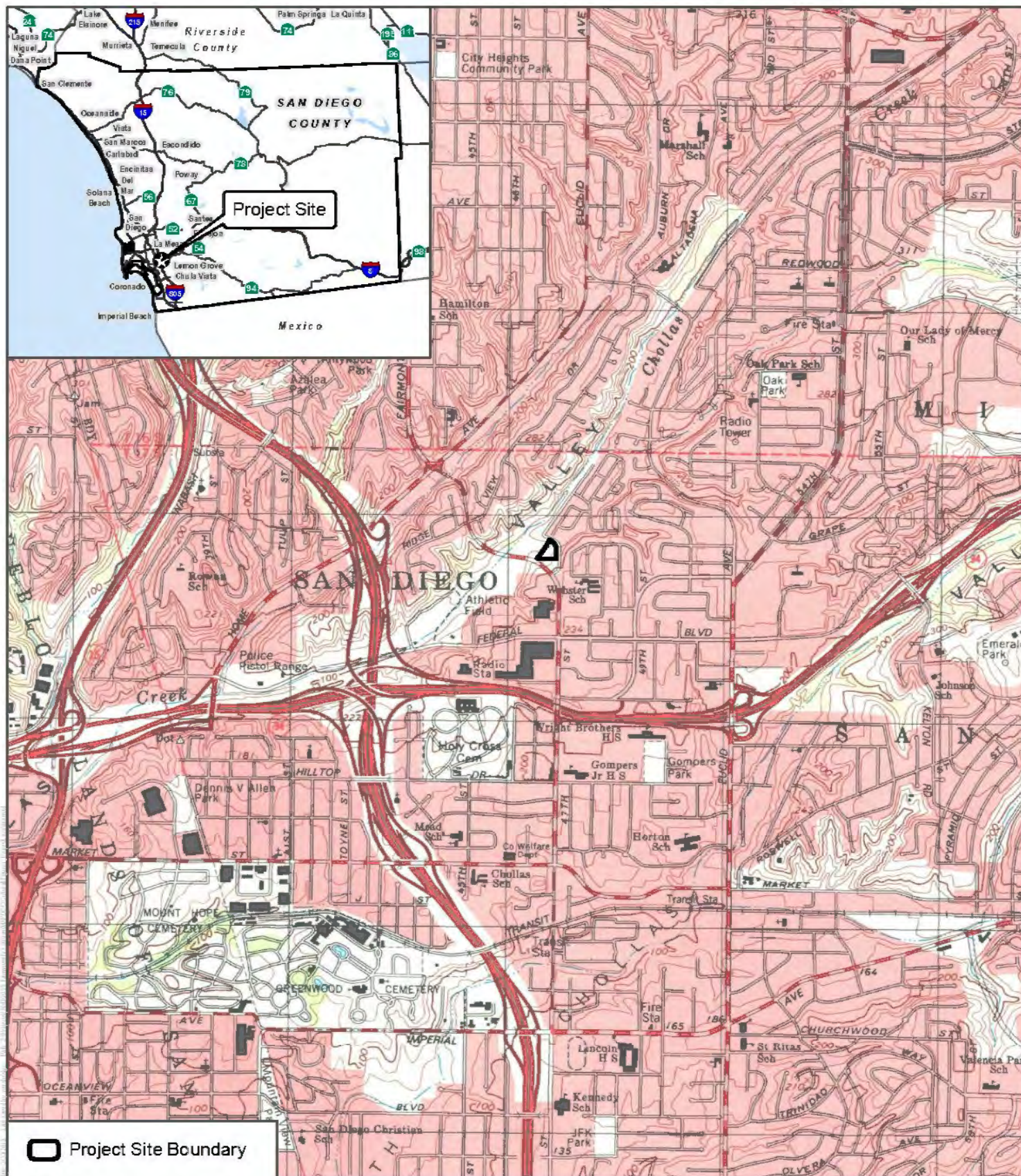
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Attachments: Figure 1. Regional project location map.



SOURCE: USGS 7.5-Minute Series National City Quadangle(s)
Township 17S/Range 2W/Section 04

DUDEK 0 1,000 2,000 Feet

From: buncelaw@aol.com
Sent: Friday, December 15, 2023 2:46 PM
To: Makayla Murillo
Subject: Fairmount Avenue Fire Station Project, City of San Diego

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Ms. Murillo,

I am writing to you on behalf of the Barona Band of Mission Indians, a federally-recognized Indian tribe for which I serve as Tribal Attorney under the direction of the Chairman and Tribal Council. I am writing in response to your letter of November 29, 2023 to former Chairman Romero, who has since been succeeded by Chairman Raymond Welch.

While the Barona Band is not aware of any specific cultural resources on the project site, that is the point of this message. The site is along a watercourse that is a tributary to the San Diego River in Mission Valley, where ancestors of the Barona Band lived in pre-contact times. That alone increases the likelihood that cultural resources are present on or below the surface of the site. Therefore, the Barona Band wishes to have a qualified archaeologist walk the site in the normal manner to determine if there is any indication of surface or buried cultural resources before any ground disturbance occurs. If so, you should be aware of the various federal, state and county law that governs the response to such a discovery.

Please let me know what follow-up you have in mind.

Sincerely,

Art Bunce
Tribal Attorney