Cultural Resources Extended Phase I Inventory Report

The Collection at Cactus Apartment Project

City of San Diego, California

MAY 2025

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Table of Contents

SECTION **PAGE NO.**

Contents

TABLES

FIGURES

EXHIBITS

APPENDICES

Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AB	Assembly Bill
Addendum	Central Village Specific Plan Environmental Impact Report Addendum
amsl	above meal sea level
APE	Area of Potential Effect
APN	Accessor's Parcel Number
CEQA	California Environmental Quality Act
CHRIS	California Historical Resources Information System
City	City of San Diego
CM	Construction Manager
CRHR	California Register of Historic Resources
cy	cubic yards
CVSP	Central Village Specific Plan
DPR	California Department of Parks and Recreation
EIR	Environmental Impact Report
ft	feet
HRB	Historical Resources Board
MLD	Most Likely Descendant
MMC	Mitigation Monitoring Coordinator
NAHC	Native American Heritage Commission
NDP	Neighborhood Development Permit
PA	Planning Areas
PRC	Public Resources Code
Project	The Collection at Cactus Apartment Project
RE	Resident Engineer
SDSU	San Diego State University
SCIC	South Coastal Information Center
Specific Plan	Central Village Specific Plan
s.f.	square feet
SLF	Sacred Lands File
STP	Shovel Test Pit
TCR	Tribal Cultural Resource
topo	topographic
USGS	United States Geological Survey
VTM	Vesting Tentative Map

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Management Summary

This report documents the cultural resources inventory conducted by Dudek for the Collection at Cactus Apartment Project (Project) located in the City of San Diego, California. The Project proposes the construction of 985 multifamily residential units. The Project area falls in Section 33, Township 18 South, Range 1 West of the Otay Mesa, CA U.S. Geological Service (USGS) 7.5-minute series topographic Quadrangle map (Figure 1).

In accordance with the California Environmental Quality Act (CEQA) and the City of San Diego (City) Historical Resources Guidelines (2001), Dudek performed a cultural resources inventory for the entire Area of Potential Effect (APE). The APE consists of the approximately 39.62-acre-acre parcel encompassing Assessor Parcel Number (APN) 646-100-77 (Figure 2). The City of San Diego has been designated as lead agency for this Project and is responsible for compliance with CEQA and local regulations.

Dudek conducted a records search of the APE and surrounding 1-mile radius at the South Coastal Information Center (SCIC) on June 5, 2023, and conducted an updated records search on May 20, 2024. The records search resulted in the identification of two previously recorded resources within the APE; CA-SDI-7208 (prehistoric lithic scatter) and CA-SDI-11,424 (prehistoric temporary campsite). Portions of CA-SDI-7208 were tested and recommended not significant under CEQA and not eligible for listing on the National Register of Historic Places (NRHP) (Hector 1986; Cheever and Davis 1988). Large portions of the resource have not been tested to determine its significance under CEQA or eligibility to the NRHP or California Register of Historical Resources (CRHR), and the previous evaluations were not located within the proposed current Project APE boundary. CA-SDI-11,424 was tested and recommended as eligible for nomination to the NRHP and consequently, eligible for listing in the CRHR (Kyle and Gallegos 1997).

A Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search of the APE and surrounding 1-mile radius was requested on May 24, 2023. The NAHC responded with negative results on June 21, 2023, and outreach letters to the tribes were mailed on May 17, 2024.

An intensive-level cultural pedestrian survey of the Project APE was conducted on May 28, 2024. The Project APE covers approximately 39.62 acres of the recorded CA-SDI-7208 resource boundary, and another previously recorded cultural resource was recorded within these 39.62 acres, CA-SDI-11,424. The locations of the previously recorded resources CA-SDI-7208 and CA-SDI-11,424 were revisited within the boundary of the APE and a total of 26 individual lithic artifacts were scattered throughout the APE, including a cluster of 13 lithic artifacts identified within a 315-square meter area, identified as CC-S-001. All 39 artifacts identified within CA-SDI-7208 (29 of which were also identified within CA-SDI-11,424) were located on the recently plowed ground surface in a disturbed context. No archaeological features or midden were distinguishable on the disturbed ground surface. It is likely that the repeated agricultural development has obscured all surface manifestations of rich, cultural deposits.

This study relies on and concurs with the previous recommendation of NRHP eligibility for CA-SDI-11,424 (Kyle and Gallegos 1997). Dudek conducted extended Phase I subsurface probes within previously unevaluated portions of CA-SDI-7208 and CA-SDI-11,424 to determine if these portions of the resources possess subsurface components that required evaluation testing. These probes, including nine STPs and ten trenches, revealed that sediments consisted of largely silty clay loam that were greatly disturbed by previous agricultural activities. These subsurface probes identified only four metavolcanic lithic flakes whose dispersal horizontally and vertically are likely the result of repeated agricultural activity.

Considering the extremely low yield of cultural material from the extended Phase I probes and the disturbed soils, previously unevaluated portions of CA-SDI-7208 and CA-SDI-11,424 do not possess a subsurface component within the current Project APE, beyond the previously identified "significant/primary site area" of CA-SDI-11,424 identified by Kyle et al. (1997). Without subsurface components, Dudek does not recommend archaeological evaluation testing of CA-SDI-7208 within the Project APE nor the eastern portion of CA-SDI-11,424.

Though CA-SDI-11,424 is eligible for listing in the NRHP and significant under CEQA and the City of San Diego guidelines due to its research potential, it does not exemplify any *special elements* that would make it eligible for historical designated under any of the HRB Criteria.

Reviewing the results of Kyle et al. (1997) evaluation testing, Dudek determined that a 4,500 sq. m portion of CA-SDI-11,424 contains intact subsurface cultural deposits that have yielded, and are likely to yield, information important in prehistory. Thus, Dudek recommends that this 4,500 sq. m portion of CA-SDI-11,424 constitutes the contributing element that makes the site eligible for listing in the NRHP and significant under CEQA and the City of San Diego guidelines (Figure 4 in Confidential Appendix D). The current Project cannot avoid impacts to these significant deposits of CA-SDI-11,424.

Dudek recommends that the significant deposits (Figure 4 in Confidential Appendix D), as the contributing element of CA-SDI-11,424, require data recovery in compliance with the City of San Diego's Historical Resources Guidelines (2022b) as specified in the data recovery program developed for CA-SDI-11,424 (Appendix E). Also, Dudek recommends archaeological and Native American monitoring during initial ground disturbing construction activities throughout the Project APE.

1 Introduction

Dudek was retained by JPI Real Estate Acquisition, LLC (project proponent) to conduct a historical resources inventory in support of the proposed The Collection at Cactus Apartment Project (Project). The Project proposes a residential development with supporting recreational amenities and infrastructure of approximately 39.62 acres (Figure 1). The primary goal of this study is the identification of archaeological, built environment, or tribal cultural resources (cultural resources) that could be impacted by Project implementation. The City of San Diego (City) is the lead agency for the Project and will assure compliance with the California Environmental Quality Act (CEQA) and local regulations. This study was conducted in accordance with CEQA and the City's Historical Resources Guidelines.

1.1 Project Location and Description

The Project is located east of Cactus Road, west of Continental Road, north of Airway Road, and south of State Route (SR) 905, in the City of San Diego, California. The Project area falls in Section 33, Township 18 South, Range 1 West of the Otay Mesa, CA U.S. Geological Service (USGS) 7.5-minute series topographic Quadrangle map (Figure 1). The Project is part of the Otay Mesa Central Village Specific Plan (CVSP), adopted by the City of San Diego (City) on April 4, 2017. Coverage for the California Environmental Quality Act (CEQA) for the Specific Plan was provided under the Central Village Specific Plan Environmental Impact Report (EIR) Addendum, dated March 17, 2017 (Addendum). The Addendum was prepared in accordance with CEQA and tiered from the Otay Mesa Community Plan Update Program EIR, which was certified by the City in 2014.

The Project proposes a Vesting Tentative Map (VTM) and Neighborhood Development Permit (NDP) to develop 985 multifamily residential units, including 83 Affordable units, across Planning Areas (PA) 10, PA 11, PA 12, and PA 13 of the CVSP. Additionally, the Project would allow for the future development of a 3.5-acre park within PA 17 of the CVSP.

The Project site encompasses one Assessor's Parcel Number (APN) 646-100-77. The Project site is approximately 38.80 gross acres within the CVSP, in the Otay Mesa area of the City of San Diego. Under existing conditions, the site is vacant and undeveloped. From a regional perspective, the Project site is located approximately one mile north of the United States/Mexico Border and is directly south of State Route 905 (SR-905). The Project site is surrounded by industrial land uses north of SR-905, residential land uses to the east, vacant and commercial land uses to the south, and residential and commercial land uses to the west. Additionally, west of the Project are land uses planned for multi-family residential, mixed use, and open space land uses associated with the CVSP.

Approval of the VTM and NDP would allow for the development of 139 units on approximately 5.49 net acres in PA 10, 324 units on approximately 8.41 net acres in PA 11, 348 units on approximately 8.89 net acres in PA 12, and 174 units on approximately 6.46 net acres in PA 13 for a total of 985 units. Additionally, the Project proposes 17,452 square feet (s.f.) in leasing/amenity space, a public park on approximately 3.5 acres in PA 17, five detention basins, and associated utilities and improvements.

Grading would occur on approximately 38.80 acres, which includes disturbance to the Project site and grading associated with off-site roadway improvements. Grading would require 17,550 cubic yards (cy) of cut and 60,475 cy of fill. It should be noted that grading activities and ultimate development would avoid the drainage area in the northwest corner of the Project site.

Access to the Project would be provided via Airway Road, Cactus Road, Continental Road, future Street D, and future street Park Way. The Project would connect to existing utilities within Airway Road, Continental Road, and Cactus Road. The Project would include appropriate improvements to Airway Road, Cactus Road, and Continental Road as well as the construction of several roadways for internal circulation. Specifically, to accommodate internal circulation, the Project includes the construction of Street D running east to west through the central portion of the Project site and connecting with Cactus Road and Continental Road, as well as the construction of Park Way running north to south and connecting with Airway Road and proposed Street D.

1.2 Area of Potential Effect

The area of potential effect (APE) for the Project consists of all areas subject to construction and grading activities. The APE covers a total of 38.80 acres and encompasses APN 646-100-77 (Figure 2). The Project APE is currently vacant, undeveloped, and was formerly utilized for agriculture. The Project is located within the Otay Mesa Community Plan Area, identified as Planning Areas 10, 11, 12, 13, and 17 in the CVSP. The Site Plan identifies 985 units.

1.3 Regulatory Context

The following section provides a summary of the applicable regulations, policies, and guidelines relating to the proper management of cultural resources.

1.3.1 California Register of Historical Resources (California Public Resources Code Section 5020 et seq.)

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

- 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.

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 (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.

1.3.2 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.

1.3.3 California Native American Graves Protection and Repatriation Act

The California Native American Graves Protection and 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 act also provides a process for the identification and repatriation of these items to the appropriate tribes.

1.3.4 California Environmental Quality Act

As described further below, the following CEQA statutes and CEQA Guidelines (14 CCR 15000 et seq.) 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; 14 CCR 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; 14 CCR 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; 14 CCR 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" (14 CCR 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 the City of San Diego Historic Guidelines section of this report for a discussion of the CEQA Guidelines for determining significance and mitigating impacts to unique archaeological resources.

1.3.5 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, the 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]). PRC Section 5097.98 also outlines the process to be followed in the event that remains are discovered. If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact the California Native American Heritage Commission (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.

1.3.6 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 recission, 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 or 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 2022a), 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.

1.3.7 Addendum to a Program Environmental Impact Report for the Central Village Specific Plan, Otay Mesa Community,

San Diego, California Project No. 408329 SCH # 2004651076

The Addendum to the Program Environmental Impact Report (EIR) for the Central Village Specific Plan provides the following analysis and mitigation (abbreviated) (City of San Diego 2017):

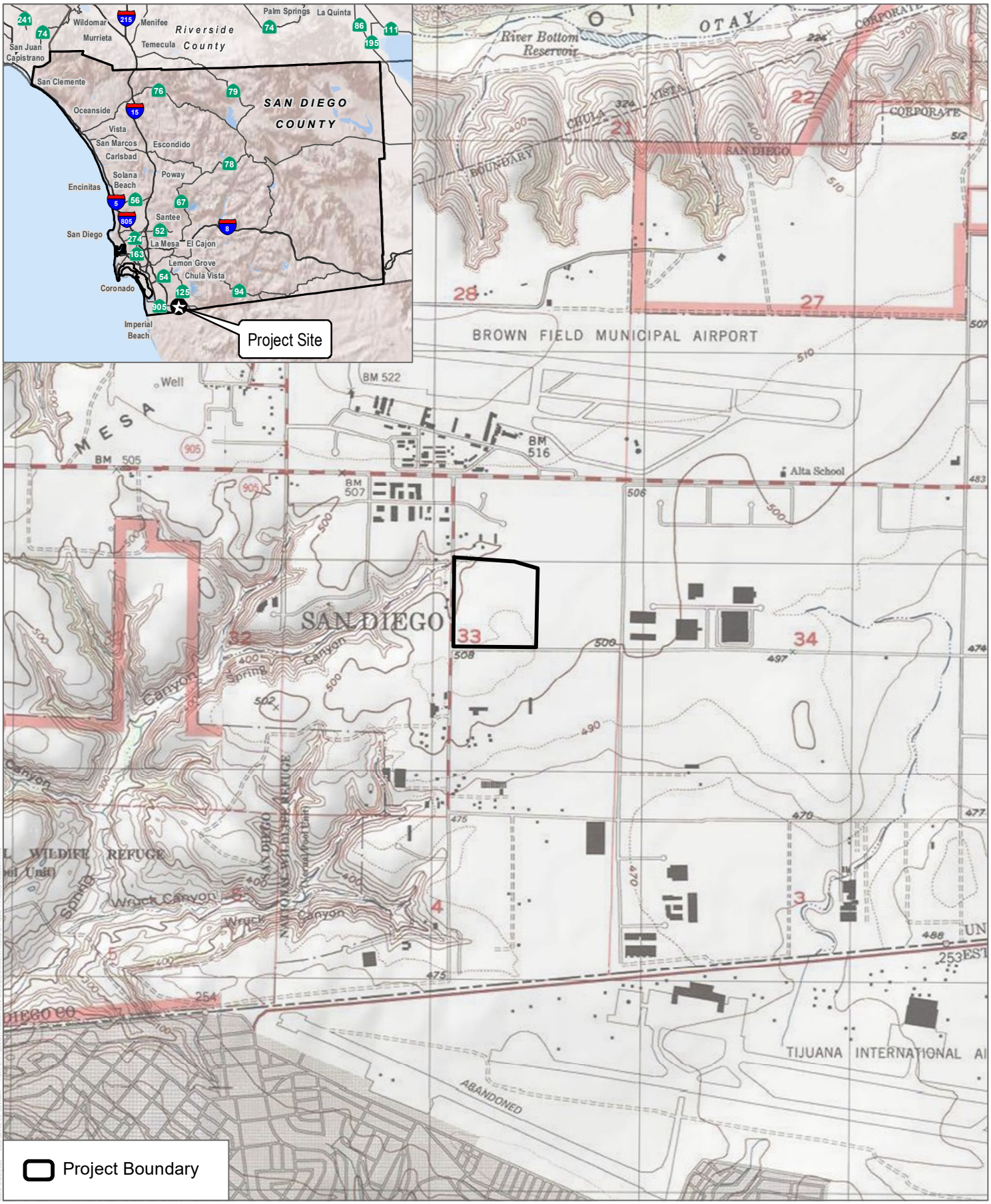
The Otay Mesa Community Plan Update (OMCPU) EIR found that impacts to prehistoric and historical resources would include substantial adverse aesthetic impacts as well as adverse physical alteration, relocation, or demolition of prehistoric and historic buildings, structures, objects, landscapes, and sites. The OMCPU EIR also determined that impacts from future development also could occur at the project-level. The OMCPU EIR identified Mitigation Frameworks HIST-1 and HIST-2 to reduce potential aesthetic and physical impacts to prehistoric and historic resources.

> Mitigation Framework HIST-1 would require the preparation of a site-specific archaeological study and implementation of appropriate mitigation to be conducted prior to the issuance of any permit for a future development project that could potentially affect a prehistoric or historical resource.
>
> Mitigation Framework HIST-2 would require the City to determine whether the affected building or structure is historically significant per the Historical Resources Guidelines prior to the issuance of any permit for a future development project that would directly or indirectly affect a building or structure that is more than 45 years of age.

1.4 Report Format and Key Personnel

Following this introduction, Chapter 2 presents the environmental and historical background of the area. Chapter 3 outlines the methods used to conduct this study. Chapter 4 presents the results of the records search, field survey, and subsurface probing. Chapter 5 summarizes the results of the study and provides recommendations for management of archaeological resources. Three appendices are included that contain additional information: Confidential Appendix A includes South Coastal Information Center (SCIC) records search information, Appendix B includes Native American correspondence documents, Appendix C contains resumes of qualified personnel, and Confidential Appendix D contains the cultural resources maps and updated California Department of Parks and Recreation (DPR) Series 523 forms.

Matthew DeCarlo, M.A., RPA served as Principal Investigator, survey and trenching field lead, and co-authored the technical report. Keshia Montifolca served as field lead and co-authored the report. Brad Comeau, M.Sc., RPA, and Michal Hale, Ph.D., RPA contributed to the cultural context section. Matthew DeCarlo and Patrick Hadel conducted the pedestrian survey with Keadan Graham of Red Tail Environmental participating as the Native American monitor. Dudek archaeologists Javier Hernandez, Mark Abelon, Shane McDonnell, and Zachary Clow and Red Tail Native American monitors Natasha Eggen, Gabe Bay, and Kenny Teter conducted extended Phase I archaeological probes. Personnel qualifications of qualified personnel are included in Appendix C.



SOURCE: USGS 7.5-Minute Series Otay Mesa Quadrangle
Township 18S/ Range 1W/ Section 33

DUDEK

0 300 600 Meters

FIGURE 1

Project Location

The Collection at Cactus

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SOURCE: Bing Imagery (Accessed 2024); Open Street Map 2019

DUDEK

0 162.5 325 Feet

FIGURE 2

Project APE

The Collection at Cactus

2 Cultural Context

2.1 Prehistoric Context

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).

2.1.1 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).

2.1.2 Archaic Period (8000 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.

2.1.3 Late Prehistoric (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.

2.2.4 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 then a group's language with less internal diversity. One method that he has employed is by drawing comparisons with historically documented changes in Germanic and Romantic language groups. Golla has observed that the "absolute chronology of the internal diversification within a language family" can be correlated with archaeological dates (2007, 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 (Pigniolo 2004; True 1966).

The Kumeyaay generally lived in smaller family subgroups that would inhabit two or more locations over the course of the year. While less common, there is sufficient evidence that there were also permanently occupied villages, and that some members may have remained at these locations throughout the year (Owen 1965; Shipek 1982; 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 (Loumala 1978). The coastal Kumeyaay exchanged a number of local goods, such as seafood, coastal plants, and various types of shell for items including acorns, agave, mesquite beans, gourds, and other more interior plants of use (Luomala 1978). Shellfish would have been procured from three primary environments, including the sandy open coast, bay and lagoon, and rocky open coast. The availability of these marine resources changed with the rising sea levels, siltation of lagoon and bay environments, changing climatic conditions, and intensity of use by humans and animals (Gallegos and Kyle 1988; Pigniolo 2005; Warren and Pavesic 1963). Shellfish from sandy environments included *Donax*, *Saxidomas*, *Tivela*, and others. Rocky coast shellfish dietary contributions consisted of *Pseudochama*, *Megastraea*, *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 (*Canus latrans*), and others. In lesser numbers, reptiles and amphibians may have been consumed.

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

2.3 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.

2.3.1 Twentieth-Century City of San Diego

The first two decades of the twentieth century brought continuity and change to San Diego. In 1846, the U.S. Army and Navy that had first arrived in the area during the Mexican-American War remained important influences, and the arrival of military personnel impacted the growing population of the City (Heibron 1936:370, 431; United States Census Bureau 1920). A population expansion especially took place between 1910 and 1920 (United States Census Bureau 1900, 1910, 1920). In 1911, Glenn H. Curtiss flew the first seaplane from North Island, and thus initiated a growing interest in aviation technologies in San Diego. Later in 1927, Charles Lindberg's historic flight on the Spirit of St. Louis from Rockwell Field in San Diego to St. Louis, Missouri heightened what Curtiss had begun (Engstrand 2005). In 1915, the Panama-California Exposition reaped new interest in local communities, and Balboa Park and the San Diego Zoo remained as city-defining legacies. San Diego Bay became an important training port for the Pacific Fleet as part of the nationwide defense campaign for World War I. During that time, parts of the eastern grounds and buildings of Balboa Park became camps for the U.S. Army, Navy, and Marine Corps. A new U.S. Marine base at San Diego Bay, now the Marine Corps Recruit Depot was also constructed. The U.S. Army and Navy both had aviation schools that operated at Rockwell Field on the recently acquired North Island. Aerial gunnery and advanced flying schools were in operation at Imperial Beach, Oneota (Ream Field), and Otay Mesa. Two U.S. Naval Radio Stations existed in San Diego; with Fort Rosecrans at Point Loma being an ideal location for defending the San Diego harbor. In 1917, the U.S. Army also established Camp kearney in nearby Linda Vista (California Development Board 1918:69, 91; Engstrand 2005 p.116, 118, 129-131, 137). During the period between 1900 and 1920, a number of communities developed as land was subdivided and new residences were constructed in areas such as the current City Heights (City of San Diego 1942). Roads such as the predecessors to Highway 80 made connectivity easier between the city and various towns across the county.

By 1930, much of the county consisted of flourishing agricultural communities as San Diego had not yet become a densely populated area (Engstrand 2005; United States Census Bureau 1930). Federal and state water development projects, military construction projects, harbor improvements, and highway construction reduced some of the effects of the Great Depression. Social changes, such as the construction of San Diego State College (1931), the transition from coal-derived power to natural gas, and the planning and hosting of the World's Fair (1935), also helped in sustaining the San Diego area (Engstrand 2005 p. 147-155). Another economic stimulus was Reuben H. Fleet's decision to move Consolidated Aircraft from Buffalo, New York to San Diego, which brought 800 employees and $9 million in orders (Engstrand 2005 p.151). During the decade between 1930 and 1940, the county population increased by a modest 38% (U.S. Census Bureau 1930, 1940). Residential development within the city increased between 10% and 20% in neighborhoods such as North Park, Barrio Heights, Mission Hills/Hillcrest, South Park, City Heights, Encanto, Marilou Park, and Middleton. During the same decade, areas such as College Heights and Talmadge experienced significant growth at 80% and over 138% due to open land and the newly constructed college (City of San Diego 1939). The population of the county remained largely concentrated in and around the city of San Diego. A strong military presence and wartime related industries in the area established a strong foundation for participation in the mobilization for World War II.

Wartime industries such as aircraft production and government, trade, and service industries created a 62% labor increase in the city and a 63% increase in the county (Day and Zimmerman Report 1945 p.87-90). Consequently, San Diego's population swelled between 1940 and 1950. With more than half a million people, San Diego had become a metropolis with well-established city neighborhoods and attractive rural areas transitioning into new suburban communities (United States Census Bureau 1950). By 1960, the population of the county had risen to

1,033,011, and between 1950 and 1970, bedroom communities such as Chula Vista, El Cajon, Oceanside, and Escondido experienced incredible growth rates (Engstrand 2005 p.166; United States Census Bureau 1960).

3 Methods

This section describes the techniques employed to identify cultural resources within the Project APE. All methods meet the Secretary of Interior's guidelines, as do all proposed project personnel for their respective roles. This inventory included a records search of the Project APE and a 1-mile radius surrounding the Project APE; initiation of correspondence with the NAHC; an intensive pedestrian survey of the Project APE; and extended Phase I subsurface probing to determine presence or absence of subsurface cultural deposits.

3.1 Records Search

Dudek conducted a California Historical Resources Information Systems (CHRIS) records search on June 5, 2023, and an updated records search request on May 20, 2024 at the South Coastal Information Center (SCIC) located on the campus of San Diego State University. The SCIC houses previously conducted cultural resources studies and site records for San Diego County. In addition, the records search examined the NRHP, Office of Historic Preservation Archaeological Determinations of Eligibility and Historic Property Directory lists, and historic maps. Historic aerial photographs and topographic maps were also reviewed online (NETR 2023). All previously recorded cultural resources and previous cultural resources investigations were plotted on records search maps and reviewed to assess the potential for discovery of cultural resources within the Project APE. Records search results are included in Confidential Appendix A.

3.2 Sacred Lands File Search

Dudek requested a NAHC search of their Sacred Lands File (SLF) on May 24, 2023, for the Project APE. The SLF consists of a database of known Native American resources. These resources may not be included in the SCIC database. The NAHC responded on June 21, 2023 with negative results. 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. The NAHC correspondence is included in Appendix B.

Outreach letters were mailed on May 17, 2024 to all Native American group representatives included on the NAHC contact list (Appendix B). These letters attempted to solicit 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. No responses have been received to date. The NAHC correspondence is included in Appendix B.

3.3 Intensive Pedestrian Survey

The intensive pedestrian survey for this Project was performed by Dudek Archaeologists Mathew DeCarlo and Patrick Hadel on May 28, 2024. Mr. DeCarlo and Mr. Hadel were accompanied by Native American monitor Keadan Graham from Red Tail Environmental. The survey was conducted using standard archaeological procedures and techniques that meet the Secretary of Interior's standards and guidelines. Survey transects were spaced 15-meters (m) wide and oriented east-west across accessible areas of the Project APE. The entire Project APE was accessible and subject to intensive pedestrian survey.

Within each transect, 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. All fieldwork was documented using field notes, digital photography, a GPS receiver with sub-meter accuracy, iPad technology with close-scale field maps, and aerial photographs. Location-specific photographs were taken using an Apple 11th Generation iPad equipped with 8 MP resolution and ArcGIS Field Maps. Accuracy of this device ranged between 3 m and 10 m.

As the entire Project APE is located within two previously recorded prehistoric resources, CA-SDI-7208 and CA-SDI-11,424, identified artifacts were flagged and attributed to these two resources. The results were updated on DPR 523 (Series 1/95) forms, using the Instructions for Recording Historical Resources (Office of Historic Preservation 1995). The updated DPR forms are included in Confidential Appendix D.

3.4 Extended Phase I Probing

The SCIC records and the pedestrian survey conducted by Dudek indicated the presence of limited surface artifacts located within the previous recorded boundaries of CA-SDI-7208 and CA-SDI-11,424 and the current Project APE. These scattered artifacts were widely dispersed within the large, recorded boundaries of CA-SDI-7208 and CA-SDI-11,424. Due to the Project APE's history of repeated agricultural use, the widely dispersed surface artifact scatter made it difficult to determine if these resources have subsurface components. Significant deposits have been previously identified within a portion of CA-SDI-11,424 (Kyle et al. 1997), however, it is unknown if other intact deposits are present in the eastern extent of the recorded site (Figure 4 in Confidential Appendix D). Further, the portion of CA-SDI-7208 that is located within the Project APE (outside of the site boundary of CA-SDI-11,424) has never been archaeological tested and there were no surface artifact concentrations to indicate where archaeological testing would be productive.

CEQA and the City's Historical Resources Guidelines (2022b), as supported by case law, require three primary steps to assess and manage impacts to cultural resources - 1) determine the presence/absence of cultural resources; 2) if an identified resource may be potentially impacted, evaluate the significance of that resource; and 3) develop management strategies for significant elements of that resource that will be impacted (typical mitigation includes avoidance or other forms of preservation in place, or data recovery). Given the history of use and disturbance of the Project APE, the study remained in the initial phase outlined above. Dudek conducted subsurface exploratory probing, as an extension of the inventory phase, within the eastern portion of CA-SDI-11,424 and within CA-SDI-7208 to assess the potential for significant cultural deposits to be present or otherwise persist, to delineate the horizontal limits of CA-SDI-11,424, and to determine if there is a subsurface component to CA-SDI-7208. Existing documentation (Kyle et al. 1997) for the western portion of these resources is sufficient to inform this inventory and make recommendations.

Initial subsurface probing was conducted on November 11 through November 13, 2024 and included the excavation of nine shovel test pits (STPs) within CA-SDI-11,424 (Figure 4 in Confidential Appendix D). STPs are small; 0.5- by 0.3-m exploratory units excavated in 20 cm increments to depths of no more than 80 cm if the unit is sterile. Depending on soil conditions and suitability, an auger measuring 4-inches in diameter, was excavated within the base of the STP to provide a more detailed stratigraphic profile, or within areas of select concern. The

STPs were inspected for buried cultural deposits. All excavated matrix was screened through 1/8-in (3-mm) mesh. Sediment profiles from the STPs were recorded and photographed.

Dudek originally planned to excavate STPs along a 100 m grid and in locations where surface artifacts were identified, however, the excavation of the STPs and augers through the highly compact clay soil hindered the fieldwork progress. Dudek refined the probing strategy to include mechanical trenching to provide a more productive method to assess the potential for subsurface cultural deposits within CA-SDI-7208 and CA-SDI-11,424. This approach is in line with the previous testing program conducted by Gallegos & Associates in 1996 at CA-SDI-11,424, in which they excavated trenches to determine the presence/absence of a subsurface deposit at the site (Kyle et al. 1997). Dudek used initial findings yielded from the excavation of the STPs to inform the trench locations. It is believed that this refined method better suited to conditions and will result in a better understanding of archaeological conditions, with the same or less overall disturbance as was previously proposed through hand-work only.

Subsurface mechanical trenching of CA-SDI-7208 and CA-SDI-11,424 was conducted on January 7, 2025 and involved the excavation of trenches using a CAT 305 Mini Excavator using a bucket equipped with a flat blade so the soil can be stripped away cleanly in level 20 cm increments. Dudek archaeologist Matthew DeCarlo directed the excavator operator to excavate ten trenches within CA-SDI-7208 and CA-SDI-11,424 (Figure 4 in Confidential Appendix D). Trenches were 46 cm wide, between 300 and 380 cm long, and 120 cm deep. This depth represents where cultural deposits are likely to be present, as indicated by the results of previous investigations. The archaeologists and Native American monitor closely watched the excavator as it removed the soil in vertically-controlled layers in order to identify soil changes, potential features or *in situ* artifacts. A sample of soils, not exceeding 5-gallons, from the trenches was dry screened through 1/8-in (3-mm) mesh for each 20 cm trench level. The trenches were inspected for evidence of buried cultural deposits. Sediment profiles from the trenches were recorded and photographed.

The STP and trenches were documented through field recordation, photography, hand-drawn sketch mapping, and/or an iPad equipped with Collector software, as appropriate. Infield analysis will be conducted for any material identified within the trenches. Trenches were backfilled into original excavation locations upon completion of excavation and documentation.

All cultural material recovered was inventoried and taken to the Dudek Carlsbad laboratory for processing. Initial lab procedures included cleaning (as appropriate), sorting, and cataloging of all items. Each item was individually examined and cataloged according to class, subclass, and material; counted; and weighed on a digital scale. All coded data was entered into a Microsoft Access database.

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4 Results

4.1 Records Search Results

Dudek conducted a California Historical Resources Information Systems (CHRIS) records search on June 5, 2023, and an updated records search request on May 20, 2024 at the South Coastal Information Center (SCIC) located on the campus of San Diego State University. The records search provided information on all documented cultural resources and previous archaeological investigations within the Project APE and a 1-mile radius of the Project APE.

4.1.1 Previously Recorded Resources

The SCIC records search results identified a total of 94 previously recorded cultural resources located 1-mile of the Project APE (Table 1). Out of the 94 resources, two resources, CA-SDI-7208, a prehistoric lithic scatter, and CA-SDI-11,424, a prehistoric temporary campsite, are located within the Project APE. Of the remaining 92 previously recorded resources, 36 are prehistoric sites, 27 are prehistoric isolates, four are multicomponent sites, and 25 are historic period sites. The 36 prehistoric sites consists of five campsites, 26 lithic scatters, one habitation site, two artifact and shell scatters, one lithic and shell scatter, and one shell scatter, the four multicomponent sites consists of two lithic scatters with historic period refuse, a temporary campsite with historic period structures, and a temporary campsite with a military bunker, and the 25 historic period sites consists of two farmsteads, two buildings, two roads, one consisting of refuse, one church and cemetery, and 17 military properties. No historic addresses are located within the Project APE, however, one historic address was recorded within 1-mile of the Project APE. The results of the records search and all California Department of Parks and Recreation (DPR) forms are attached a part of Confidential Appendix A.

Table 1. Previously Recorded Cultural Resources within 1-Mile of the Project APE

Primary Number	Trinomial	Age	Resource Type	Significance Criteria
Resources Intersecting APE				
P-37-007208	CA-SDI-7208	Prehistoric	Lithic scatter	Not significant
P-37-011424	CA-SDI-11,424	Prehistoric	Temporary campsite	Eligible
Resources Outside APE				
P-37-006941	CA-SDI-6941	Prehistoric	Artifact scatter and shell midden	Not significant
P-37-007857	CA-SDI-7857	Prehistoric	Lithic scatter	Not evaluated
P-37-010185	CA-SDI-10,185	Prehistoric	Temporary campsite	Not evaluated
P-37-010186	CA-SDI-10,186	Prehistoric	Lithic scatter	Not evaluated
P-37-010187	CA-SDI-10,187	Prehistoric	Temporary campsite	Not evaluated
P-37-010188	CA-SDI-10,188	Prehistoric	Lithic scatter	Not significant
P-37-010189	CA-SDI-10,189	Prehistoric	Temporary campsite	Not evaluated
P-37-010196	CA-SDI-10,196	Prehistoric	Temporary campsite	Not evaluated
P-37-010245	CA-SDI-10,245	Prehistoric	Lithic scatter	Not evaluated
P-37-010608	CA-SDI-10,608	Prehistoric	Lithic scatter	Not evaluated

Table 1. Previously Recorded Cultural Resources within 1-Mile of the Project APE

Primary Number	Trinomial	Age	Resource Type	Significance Criteria
P-37-010616	CA-SDI-10,616	Prehistoric	Lithic scatter	Not evaluated
P-37-010617	CA-SDI-10,617	Prehistoric	Lithic scatter	Not significant
P-37-010618	CA-SDI-10,618	Prehistoric	Lithic scatter	Not significant
P-37-010619	CA-SDI-10,619	Prehistoric	Artifact scatter and shell scatter	Significant under CEQA
P-37-010620	CA-SDI-10,620	Prehistoric	Habitation site	Significant under CEQA
P-37-010621	CA-SDI-10,621	Prehistoric	Lithic scatter	Significant under CEQA
P-37-010623	CA-SDI-10,623	Multicomponent	Lithic scatter, shell scatter; historic refuse	Not eligible
P-37-010628	CA-SDI-10,628	Multicomponent	Lithic scatter, shell scatter; historic refuse, foundation, wells/cisterns	Not significant
P-37-010734	CA-SDI-10,734	Prehistoric	Lithic scatter	Not evaluated
P-37-010963	CA-SDI-10,963	Prehistoric	Lithic scatter and shell scatter	Not eligible
P-37-011065	CA-SDI-11,065	Prehistoric	Lithic scatter	Not evaluated
P-37-011080	CA-SDI-11,080	Prehistoric	Temporary campsite	Not significant
P-37-011423	CA-SDI-11,423	Prehistoric	Lithic scatter	Not evaluated
P-37-011674	CA-SDI-11,674	Multicomponent	Temporary campsite; structures	Not eligible
P-37-011680	CA-SDI-11,680	Prehistoric	Lithic scatter	Not evaluated
P-37-012229	CA-SDI-12,229	Multicomponent	Temporary campsite; military bunker	Not eligible
P-37-014283	CA-SDI-14,082	Prehistoric	Lithic scatter	Not evaluated
P-37-014291	CA-SDI-14,090	Prehistoric	Lithic scatter	Not evaluated
P-37-014293	CA-SDI-14,092	Prehistoric	Lithic scatter	Not evaluated
P-37-014294	CA-SDI-14,093	Prehistoric	Lithic scatter	Not evaluated
P-37-014295	CA-SDI-14,094	Prehistoric	Lithic scatter	Not evaluated
P-37-014296	-	Prehistoric	Isolate: Lithic	Not significant
P-37-014298	-	Prehistoric	Isolate: Lithic	Not significant
P-37-014299	-	Prehistoric	Isolate: Lithic	Not significant
P-37-014300	-	Prehistoric	Isolate: Lithic	Not significant
P-37-014301	-	Prehistoric	Isolate: Lithic	Not significant
P-37-014302	-	Prehistoric	Isolate: Lithic	Not significant
P-37-014303	-	Prehistoric	Isolate: Lithic	Not significant
P-37-014925	-	Prehistoric	Isolate: Lithic	Not significant
P-37-014968	-	Prehistoric	Isolate: Lithic	Not significant
P-37-014969	-	Prehistoric	Isolate: Lithic	Not significant
P-37-014970	-	Prehistoric	Isolate: Lithic	Not significant
P-37-015023	-	Prehistoric	Isolate: Lithic	Not significant

Table 1. Previously Recorded Cultural Resources within 1-Mile of the Project APE

Primary Number	Trinomial	Age	Resource Type	Significance Criteria
P-37-015976	CA-SDI-14,559	Prehistoric	Lithic scatter	Not significant
P-37-015980	-	Historic	Farmstead	Not significant
P-37-015982	-	Historic	Farmstead	Not significant
P-37-015987	-	Historic	Building	Not significant
P-37-015988	-	Historic	Church and cemetery	Not evaluated
P-37-018246	-	Historic	Military property	Appears eligible; Significant
P-37-018247	-	Historic	Military property	Not significant
P-37-018248	-	Historic	Military property	Not significant
P-37-018249	-	Historic	Military property	Not significant
P-37-018250	-	Historic	Military property	Not significant
P-37-018251	-	Historic	Military property	Not significant
P-37-018252	-	Historic	Military property	Not significant
P-37-018253	-	Historic	Military property	Not significant
P-37-018254	-	Historic	Military property	Not significant
P-37-018255	-	Historic	Military property	Not significant
P-37-018256	-	Historic	Military property	Not significant
P-37-018257	-	Historic	Military property	Not significant
P-37-018258	-	Historic	Military property	Not significant
P-37-018259	-	Historic	Military property	Not significant
P-37-018260	-	Historic	Military property	Not significant
P-37-018261	-	Historic	Military property	Not significant
P-37-025707	CA-SDI-17,100	Prehistoric	Lithic scatter	Not eligible
P-37-031491		Historic	Highway/trail	Not evaluated
P-37-031948	CA-SDI-20,226	Prehistoric	Lithic scatter	Not evaluated
P-37-031949	CA-SDI-20,227	Prehistoric	Shell scatter	Not evaluated
P-37-031950	CA-SDI-20,228	Prehistoric	Lithic scatter	Not evaluated
P-37-031953	CA-SDI-20,231	Prehistoric	Lithic scatter	Not evaluated
P-37-031954	-	Historic	Military property, engineering structure: runway	Not evaluated
P-37-031955	-	Prehistoric	Isolate: Lithic	Not significant
P-37-031956	-	Prehistoric	Isolate: Lithic	Not significant
P-37-031957	-	Prehistoric	Isolate: Lithic	Not significant
P-37-031958	-	Prehistoric	Isolate: Lithic	Not significant
P-37-031959	-	Prehistoric	Isolate: Lithic	Not significant
P-37-031960	-	Prehistoric	Isolate: Lithic	Not significant
P-37-034480	-	Prehistoric	Isolate: Lithic	Not significant
P-37-034481	CA-SDI-21,508	Historic	Historic refuse	Not evaluated
P-37-037030	-	Prehistoric	Isolate: Lithic	Not significant

Table 1. Previously Recorded Cultural Resources within 1-Mile of the Project APE

Primary Number	Trinomial	Age	Resource Type	Significance Criteria
P-37-037031	-	Prehistoric	Isolate: Lithic	Not significant
P-37-037032	-	Prehistoric	Isolate: Lithic	Not significant
P-37-037033	-	Prehistoric	Isolate: Lithic	Not significant
P-37-037034	-	Prehistoric	Isolate: Lithic	Not significant
P-37-037035	-	Prehistoric	Isolate: Lithic	Not significant
P-37-037036	-	Prehistoric	Lithic scatter	Not significant

CA-SDI-7208

CA-SDI-7208 (P-37-007208) was recorded by D. Ferguson in 1979 as a light lithic scatter (Ferguson 1979). CA-SDI-7208 was enlarged during subsequent surveys to include Otay Mesa Road to the north, La Media Road to the east, the U.S./Mexico border to the south, and Cactus Road to the west to incorporate a total of 725 acres (Cheever and Davis 1988; Kyle and Gallegos 1999). Portions of CA-SDI-7208 were tested and recommended not significant under CEQA and not eligible for listing on the NRHP (Hector 1986; Cheever and Davis 1988). Large portions of the resource have not been tested to determine its significance under CEQA or eligibility to the NRHP or CRHR, and the previous evaluations were not located within the proposed current Project APE boundaries.

CA-SDI-11,424

CA-SDI-11,424 (P-37-11,424) was recorded by J.R. Cook in 1989 as a large base camp with hundreds of artifacts, shell, and subsurface midden deposits measuring 275 m x 360 m with an estimated depth of 50 cm (Cook 1989). Artifacts include an Elko Eared projectile point fragment, San Dieguito discoidal scrapers, unifacial scrapers, scraper planes, cores, flakes, handstones, and metate fragments, and most of the flaked lithics were made from Santiago Peak metavolcanic material. It was also noted that the site was disturbed by agriculture (Cook 1989). The site was revisited as part of the Otay Mesa Trunk Sewer Project by Gallegos & Associates in 1997, and it was tested for the State Route (SR) 905 project. The testing program was conducted in 1996 which included the collection of surface artifacts from 103,000 sq. m., and excavation of 18 backhoe trenches, 27 STPs, and 15 1 m x 1 m units. A total of 15,087 pieces of debitage, three pieces of obsidian debitage, 48 bifaces, 262 flake tools, 252 core, 353 core/cobble tools, two abraders, two ochre-grinders, two smoothing stones, one cooking stone, 34 handstones, six metate fragments, six unidentifiable ground stone fragments, one shell scraper, two *Olivella biplicate* shell beads, one otolith, 87.78 g of bone, 2,024.59 g of shell, 2.73 g of charcoal, and historic period material were recovered during the testing program (Kyle et al. 1997). Kyle et al. (1997) states that the "significant/primary site area" of CA-SDI-11,424 is approximately 120 m (N/S) x 60 m (E/W) (7,200 sq. m) in size and the midden extends to a depth of 140 cm. Based on the presence of an intact cultural deposit with a large quantity and wide range of artifacts, faunal remains, material for radiocarbon analysis, intact prehistoric features, and the potential to answer research questions, CA-SDI-11,424 was recommended eligible for inclusion in the NRHP, and significant under City of San Diego and CEQA guidelines and consequently for listing in the CRHR (Kyle et al. 1997).

4.1.2 Previously Recorded Studies

The SCIC records identified that 124 cultural resources studies have been conducted within 1-mile of the Project APE. Of the 124 previous studies, 10 intersect the Project APE (Table 2). Of these 10 studies, one is an historic property report for SR 905 in 1999, a cultural resources survey and testing report for the Otay Mesa Road Widening Project in 1996, a historic resources inventory report for the Otay Mesa Road Widening Project in 2005, a cultural resources study for the Lumina Project in 2018, two cultural resources monitoring reports in 2013 and 2015, and four environment impact reports; one for the Otay Mesa Trunk Sewer Project in 2005, one for the Master Storm Water System Maintenance Program in 2011, and two for the Otay Mesa Community Plan Update in 2013. The previous studies only slightly cover the western and southern borders of the Project APE, and the entire Project APE has not been previously studied. The studies not listed within Table 4.2 are included with the SCIC records search results as an attachment in Confidential Appendix A.

Table 2. Previous Cultural Resources Studies Intersecting the Project APE

Report Number	Authors	Date	Title
SD-06369	GALLEGOS & ASSOCIATES	1999	HISTORIC PROPERTY SURVEY REPORT FOR THE STATE ROUTE 905
-	GALLEGOS & ASSOCIATES	1997	ROUTE 805 CULTURAL RESOURCES TEST REPORT FOR SITES CA-SDI-6941, LOCI G AND Y; CA-SDI-11423; and CA_SDI-11424
SD-09402	GALLEGOS & ASSOCIATES	1996	CULTURAL RESOURCES SURVEY AND TESTING REPORT FOR THE OTAY MESA ROAD WIDENING PROJECT
SD-09449	CITY OF SAN DIEGO	2005	DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE OTAY MESA TRUNK SEWER PROJECT
SD-09450	GALLEGOS & ASSOCIATES	2005	HISTORICAL RESOURCE INVENTORY FOR THE OTAY MESA TRUNK SEWER PROJECT, OTAY MESA, CALIFORNIA
SD-13006	AFFINIS	2011	MASTER STORM WATER SYSTEM MAINTENANCE PROGRAM
SD-14368	CITY OF SAN DIEGO	2013	DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT FOR THE OTAY MESA COMMUNITY PLAN UPDATE, CITY OF SAN DIEGO PROJECT NUMBER 30330/304032
SD-14714	CITY OF SAN DIEGO	2013	FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT FOR THE OTAY MESA COMMUNITY PLAN UPDATE, CITY OF SAN DIEGO
SD-15229	HDR	2013	ETS #24738.03, CULTURAL RESOURCES MONITORING FOR THE INTRUSIVE POLE INSPECTIONS, METRO DISTRICT, SUB-AREAS BORD, SNYS, IMPE, OTAY, SBAY, HILT, MONT, SSDE, LINC PROJECT, SAN DIEGO COUNTY, CALIFORNIA (HDR #207357)
SD-15687	HDR	2015	ETS #22164, CULTURAL RESOURCES MONITORING FOR THE C1202: SAN YSIDRO, INSTALL NEW 12 KV CIRCUIT PROJECT, SAN DIEGO COUNTY, CALIFORNIA
SD-17510	BRIAN F. SMITH AND ASSOCIATES, INC.	2018	A CULTURAL RESOURCES STUDY FOR THE LUMINA PROJECT, TENTATIVE MAP NUMBER 1972222

SD-06369

This is a historic property survey report prepared for the SR 905 by Gallegos & Associates in 1999 (Kyle and Gallegos 1999). The study covered 2,365 acres, bordering the current proposed Project APE. The site CA-SDI-7208, consisting of a lithic scatter, is located within the SR 905 Project APE and the current proposed Project APE. The survey for the SR 905 project enlarged the site boundary for CA-SDI-7208 to north of Airway Road and west to Cactus Road, to include previously recorded sites CA-SDI-7857, CA-SDI-10,245/CA-SDI-10,734, CA-SDI-11,424, CA-SDI-14,082, and east to La Media Road. Portions of CA-SDI-7208 were tested for the Brown Field Industrial Park project and was recommended not significant. It was also tested by Kyle and Gallegos in 1995 and recommended not significant. However, large portions of the newly enlarged site were not tested for significance under CEQA for listing on the NRHP. CA-SDI-7208 within the SR 905 APE, except for the portion identified as CA-SDI-11,424, is part of the Otay Mesa sparse lithic scatter, and recommended not eligible for inclusion in the NRHP, and no additional work was recommended for the portion of CA-SDI-7208 located within the SR 905 APE (Kyle and Gallegos 1999).

Kyle and Gallegos (1999) provided a summary of work evaluation testing conducted at CA-SDI-11,424 by Kyle et al. (1997). CA-SDI-11,424 is located within the SR 905 APE and was tested and recommended eligible for listing on the NRHR by Kyle et al. (1997). CA-SDI-11,424 is also located in the current proposed Project APE. The site was tested by Kyle et al. (1997) for the Route 905 study, and 18 backhoe trenches, 27 shovel test pits (STPs), and 15 1x1 m units were excavated, including the collection of surface artifacts from a 103,000 square m grid. A dense concentration of prehistoric cultural material was identified to a depth of 140 cm and consisted of a wide range of artifacts including debitage, flaked lithic tools, hammerstones, cores, ground stone, bifaces, shell beads, bone fragments, shell fragments, and hearth features. The shell and soil/charcoal had radiocarbon dates from 3,300 to 7,600 years ago (Kyle and Gallegos 1999). Based on the presence of an intact cultural deposit with a large quantity and wide range of cultural material, material for radio carbon analysis, intact prehistoric features, and the potential for the site to answer significant research questions, CA-SDI-11,424 was recommended eligible for inclusion on the NRHP, and consequently, eligible for listing in the CRHR. Since CA-SDI-11,424 was identified as significant, the project design was changed to avoid impacting the subsurface deposits at CA-SDI-11,424 (Kyle and Gallegos 1999). Monitoring was recommended if construction work is to be conducted within the vicinity of the site (Kyle and Gallegos 1999).

ROUTE 905 CULTURAL RESOURCES TEST REPORT

This testing report for the Route 905 Project was conducted by Gallegos & Associates in 1997 to determine eligibility to the NRHP for prehistoric sites, CA-SDI-6941, CA-SDI-11,423, and CA-SDI-11,424, within the 905 APE (Kyle et al. 1997). CA-SDI-11,424 is located within the current proposed Project APE. The testing program was conducted in 1996 which included the collection of surface artifacts from 103,000 sq. m., and excavation of 18 backhoe trenches, 27 STPs, and 15 1 m x 1 m units. The surface collection consisted of a 10 percent sample collection using 10 m x 10 m grids. The STPs were excavated in 10 cm levels and to a sterile subsurface horizon or to 80 to 90 cm. The units were excavated in 10 cm levels using the natural surface contour until bedrock or a sterile subsurface horizon was confirmed. A total of 15,087 pieces of debitage, three pieces of obsidian debitage, 48 bifaces, 262 flake tools, 252 core, 353 core/cobble tools, two abraders, two ochre-grinders, two smoothing stones, one cooking stone, 34 handstones, six metate fragments, six unidentifiable ground stone fragments, one shell scraper, two *Olivella biplicate* shell beads, one otolith, 87.78 g of bone, 2,024.59 g of shell, 2.73 g of charcoal, and historic period material were recovered during the testing program (Kyle et al. 1997).

The surface collection included the placement of a 10 m N/S and E/W oriented collection grid. The grid included a 10 m x 390 m N/S line that extended from the dirt road at the north boundary of the site, south to Airway Road, and one 200 m E/W gridline centered on the datum. A dense deposit of surface artifacts was present in the northwestern portion of the site. These grids yielded between 101 and 238 artifacts per 10 m x 10 m grid and was identified as the 3,000 sq. m "significant portion of CA-SDI-11,424", whereas the remaining grids yielded between five and 45 artifacts per grid (Kyle et al. 1997). Three fire-hearth features were identified in Units 1, 4, 7, 8, and 11. The fieldwork identified a culturally rich midden deposit to a maximum depth of 140 cm.

The faunal analysis on the bone recovered from CA-SDI-11,424 represents animal remains generally found in relation to prehistoric sites through San Diego County. The bones are generally burned and exhibit cleaver marks or crushing. Rabbits, hares, mice and rats were staples. The shell analyzed were identifiable to 18 species, and the most frequently represented species included *Mytilus* sp. (19.41%), *Argopecten* sp. (11.57%), *Chione* sp. (10.73%), *Protothaca* sp. (9.75%), and *Tivela stultorum* sp. (8.24%).

Analysis of cultural material recovered identified site CA-SDI-11,424 as an Early to Middle Holocene prehistoric habitation site with radiocarbon dates ranging from approximately 3,300 to 7,600 years ago. A large quantity of shell (1,956.10 g) with 18 identified species and 76.51 g of bone with seven identified species, indicates that the site residents were exploiting a range of environmental niches for food resources.

The presence of a variety of flaked lithic tools, ground stone, beads, and a shell scraper, indicate that a range of activities were occurring at this location. The number of flaked stone tools (n=604) outnumber the ground stone implements (n=50). The number of cores (n=252) and biface (n-48) suggest that core/cobble tools, flaked stone tools, and bifaces were of importance.

The presence of ground stone, fire-hearths, bone, and shell attest to the preparation and cooking of food at the site. Recovery of an obsidian flake, jasper flakes, and chalcedony and chert debitage, suggest that residents at CA-SDI-11,424 traded or traveled to lithic resources in the desert for jasper, northcentral California or Mexico for obsidian, and within San Diego for chalcedony and chert. The recovery of core/cobble tools and flake tools suggests that the working of soft woods and reeds were an important focus, and likely centered on the processing of plant and/or material resources, and the wide variety of tools indicates the residents at CA-SDI-11,424 were sophisticated knappers.

The top 30 to 40 cm of CA-SDI-11,424 have been disturbed from agricultural activities for over 100 years. Below 30 cm, the majority of the site appears to be relatively undisturbed. Kyle et al. (1997) state that the "significant/primary site area" of CA-SDI-11,424 is approximately 120 m (N/S) x 60 m (E/W) (7,200 sq. m) in size. The midden extends to a depth of 140 cm. Prehistorically, the site may have extended north of Spring Canyon, however, construction activities have destroyed that area. Based on the presence of an intact cultural deposit with a large quantity and wide range of artifacts, faunal remains, material for radiocarbon analysis, intact prehistoric features, and the potential to answer research questions, CA-SDI-11,424 was recommended eligible for inclusion in the NRHP, and significant under City of San Diego and CEQA guidelines (Kyle et al. 1997).

SD-09402

This is a survey and test report for the Otay Mesa Road Widening Project by Gallegos & Associates in 1996 (Kyle et al. 1996). The study covered 95 acres and intersects the northern half of the current proposed Project APE. CA-SDI-7208 was enlarged north of Airway Road and west to Cactus Road, to include the previously recorded site CA-SDI-

11,424, and east to La Media Road. Large portions of the site were not tested to determine significance under CEQA (Kyle et al. 1996). CA-SDI-11,424 is located adjacent to Cactus Road in agricultural fields and was revisited during the survey. Based on the surface artifacts, the boundaries were expanded to the south and east, and identified CA-SDI-11,424 as part of CA-SDI-7208 (Kyle et al. 1996).

SD-09450

This is a historical resource inventory report for the Otay Mesa Trunk Sewer Project by Gallegos & Associates in 2005 (Guerrero and Gallegos 2005). The study includes 8.5 miles within the Otay Mesa Area and located adjacent to the western boundary of the current proposed Project APE. The study notes that as part of the SR 905 project, CA-SDI-7208 and CA-SDI-11,424 were revisited. CA-SDI-7208 was noted to run together with sites CA-SDI-11,424 and CA-SDI-10,963 due to the sparse lithic scatter. The boundary for CA-SDI-11,424 was enlarged, and testing identified a rich subsurface cultural deposit with large quantities of materials to 140 cm and recommended as significant and eligible for the NRHP (Guerrero and Gallegos 2005). CA-SDI-11,424 was revisited and no noticeable change in the site condition was noted. Since CA-SDI-11,424 was previously tested and identified as significant, extended testing to determine the extent of the western boundary was recommended, and if the site extends into the APE, then mitigation through the completion of a data recovery program, or avoidance through redesign was recommended (Guerrero and Gallegos 2005).

4.1.3 Historic Map Review

Dudek consulted historic topographic (topo) maps and aerial photographs to understand development of the Project APE and surrounding properties. Historic aerial photographs of the Project APE were available from 1953 to 2020 (NETR 2023). The 1953 aerial reveals that the Project APE was undeveloped. Airway Road and Cactus Road existed as dirt roads adjacent to the Project APE. The 1966 aerial reveals the Project APE was utilized for agricultural purposes. Agricultural activities within the Project APE are observed from the 1960s to the 1980s. On the 1987 aerial, Cactus Road appears to be paved while Airway Road remains unpaved. On the 1990 aerial, the Project APE continues to be utilized for agriculture, and the APE immediately to the north is graded. No substantial changes are observed within the Project APE on the 1993 to 2005 aerials. On the 2009 aerial, grading can be observed within the northwestern section of the Project APE, along with some diagonal dirt roads from the northwest to the southeast sections of the Project APE. On the 2010 aerial, additional grading is observed in the southwestern section of the Project APE, and immediately north, for the construction of the California SR 905 Otay Mesa freeway. SR 905 is observed to the north on the 2012 aerial, and the Project APE remains undeveloped as observed on the 2020 aerial.

Historic topo maps (available from 1943) were reviewed and the roads where Cactus Road and Airway Road would overlay are observed on the 1943 to 2021 topo maps. SR 905 is observed on the 2012 to 2021 topo maps. A review of the aerial and topo maps reveals that no historic age structures are present within the Project APE, and that the Project APE had a history of agricultural use.

4.2 Intensive Pedestrian Survey

The intensive pedestrian survey was conducted by Dudek archaeologists Matthew DeCarlo and Patrick Hadel on May 28, 2024. Red Tail Environmental Native American monitor Keadan Graham participated in the survey. The Project APE has been disturbed by years of agricultural activities. Visibility of the ground surface was very high

(90-100%) throughout the Project APE due to the recent plowing of the field (Exhibit 1). Only limited remnants of grasses were present to obscure ground visibility. The recent plowing of the field disturbed the ground surface over the entire Project APE. Modern debris including scraps of plastic, paper, and metal are scattered throughout the Project APE. The SCIC records search identified two previously recorded archaeological resources within the Project APE, CA-SDI-7208 and CA-SDI-11,424. The survey team revisited both resource locations and identified prehistoric artifacts in both previous site boundaries which are described below (locations of resources are included in Figure 3, included in Confidential Appendix D). No new archaeological resources, features, or built environment resources were identified.

Exhibit 1. Overview from northeast corner of Project APE; view southwest.

4.2.1 Previously Recorded Sites

CA-SDI-7208

CA-SDI-7208 (P-37-007208) was recorded by D. Ferguson in 1979 as a light lithic scatter and later expanded to incorporate a total of 725 acres (Cheever and Davis 1988; Ferguson 1979; Kyle and Gallegos 1999). The current Project APE covers approximately 40 acres of the recorded CA-SDI-7208 site boundary that were never tested for significance under CEQA or the NRHP. Another previously recorded cultural resource was recorded within this 40-acre portion, CA-SDI-11,424. Both resources consist of prehistoric artifact scatters. The current survey team resurveyed the 40-acre segment of CA-SDI-7208 within the Project APE, including the entirety of CA-SDI-11,424. The current survey identified 26 individual lithic artifacts scattered throughout the Project APE and an additional cluster of 13 lithic artifacts identified within a 315-square meter area, identified as CC-S-001 (Table 3 and Exhibit 2). The 26 individual lithic artifacts include 11 pieces of debitage, 10 lithic cores, two tested cobbles, two simple flake tools, and one granitic handstone. CC-S-001 includes eight metavolcanic flakes and five metavolcanic cores. All 39 artifacts identified within CA-SDI-7208 (29 of which were also identified within SDI-11,424) were located on the recently plowed ground surface in a disturbed context. No archaeological features or midden were distinguishable on the disturbed ground surface. Besides, the cluster of 13 lithic artifacts (CC-S-001), no other concentrations of cultural material or midden soil were identified indicating an increase potential for subsurface materials. It is likely that the repeated agricultural development and previous cultural studies have obscured all surface manifestations of rich, cultural deposits. A California Department of Parks and Recreation (DPR) cultural resource update form for CA-SDI-7208 is provided in Confidential Appendix D.

Table 3. Artifacts Identified within CA-SDI-7208 Site Boundary

Artifact Type	Material Type	Count
Primary flake	Metavolcanic	1
Secondary flake	Metavolcanic	7
Tertiary flake	Metavolcanic	8
Tertiary flake	Volcanic	1
Shatter	Metavolcanic	2
Core	Metavolcanic	15
Tested Cobble	Metavolcanic	2
Simple flake tool	Metavolcanic	2
Handstone	Granitic	1

CA-SDI-11,424

CA-SDI-11,424 (P-37-11,424) was recorded by J.R. Cook in 1989 as a large base camp with hundreds of artifacts, shell, and subsurface midden deposits measuring 77,700 m x 360 m with an estimated depth of 50 cm (Cook 1989). Artifacts include an Elko Eared projectile point fragment, San Dieguito discoidal scrapers, unifacial scrapers, scraper planes, cores, flakes, handstones, and metate fragments, and most of the flaked lithics were made from Santiago Peak metavolcanic material. It was also noted that the site was disturbed by agriculture (Cook 1989). The site was revisited as part of the Otay Mesa Trunk Sewer Project by Gallegos & Associates in 1997, and it was tested for the SR 905 project and recommended as eligible for nomination to the NRHR (Kyle et al. 1997).

The recorded boundary of CA-SDI-11,424 is located predominantly within the current Project APE. The current survey identified 16 individual lithic artifacts scattered throughout the Project APE, and an additional cluster of 13 lithic artifacts identified within a 315-square meter area, identified as CC-S-001 (Table 4). These 29 artifacts are also within the site boundary of CA-SDI-7208 and are counted in Table 3 above. The 16 individual lithic artifacts located within the recorded boundary of CA-SDI-11,424 include six pieces of debitage, seven lithic cores, one tested cobble, and two simple flake tools. CC-S-001 includes eight metavolcanic flakes and five metavolcanic cores. All 29 artifacts identified within CA-SDI-11,424 site boundary were located on the recently plowed ground surface in a disturbed context. No archaeological features or midden were distinguishable on the disturbed ground surface. Besides, the cluster of 13 lithic artifacts (CC-S-001), no other concentrations of cultural material or midden soil were identified indicating an increase potential for subsurface materials. It is likely that the repeated agricultural development and previous cultural studies have obscured all surface manifestations of cultural deposits. A California Department of Parks and Recreation (DPR) cultural resource update form for CA-SDI-11,424 is provided in Confidential Appendix D.

Table 4. Artifacts Identified within CA-SDI-11,424 Site Boundary

Artifact Type	Material Type	Count
Primary flake	Metavolcanic	1
Secondary flake	Metavolcanic	5
Tertiary flake	Metavolcanic	6
Tertiary flake	Volcanic	1
Shatter	Metavolcanic	1
Core	Metavolcanic	12
Tested Cobble	Metavolcanic	1
Simple flake tool	Metavolcanic	2

Exhibit 2. Overview of CC-S-001, view facing southwest

4.3 Extended Phase I Probing

The SCIC records and the pedestrian survey conducted by Dudek indicated the presence of limited surface artifacts located within the previous recorded boundaries of CA-SDI-7208 and CA-SDI-11,424 and the current Project APE. Significant deposits have been previously identified within a portion of CA-SDI-11,424 (Kyle et al. 1997) and this study agrees with those finding and did not conduct any additional Phase I probing within the "significant/primary site area" described by Kyle et al. (1997) (Figure 4; Confidential Appendix D). Because no previous testing has been conducted within the eastern extent of the recorded boundaries of CA-SDI-11,424 or within the portion of CA-SDI-7208 that is located within the Project APE, Dudek conducted extended phase I probing.

Shovel Test Pits

Dudek excavated STP 01 through STP 9 within the boundary of CA-SDI-11,424, but outside of the previously determined "significant/primary site area" (Figure 4; Confidential Appendix D). The depth of the STPs varied from

40 to 80 cm depending on the compaction of the clay subsurface (Table 5). STP 01, 03, 05, and 06 were abandoned at 40 cm of depth and Augers 1 through Auger 04 were excavated within the base of the STPs to a depth of 100 cmbs. STP 02, 07, and 09 were excavated to depths of 80 cmbs and Auger 05 was excavated at the base of STP 09 to a depth of 160 cm to observe stratigraphy (Exhibit 3). The upper stratum of all STPs extended 5 cmbs and consists of a light brown silt loam that had recently undergone agricultural discing. The next stratum consists of highly compacted, dark brown silty clay containing increasing levels of moisture. This stratum extended to depths of 105 cmbs. Auger 09 shows that a yellow/tan brown sandy clay loam extended from 105 to 160 cmbs. STP 01 through STP 08 were negative for cultural materials, however, STP 09 contains a single metavolcanic lithic flake identified between 50 and 60 cmbs.

Table 5. Shovel Test Pit within CA-SDI-11,424 Site Boundary

STP #	Depth (cm)	Auger #	Auger Depth (cm)	Cultural Material
STP 01	0-40	Auger 01	40-100	Negative
STP 02	0-80	-	-	Negative
STP 03	0-40	Auger 02	40-100	Negative
STP 04	0-40	-	-	Negative
STP 05	0-40	Auger 03	40-105	Negative
STP 06	0-40	Auger 04	40-100	Negative
STP 07	0-80	-	-	Negative
STP 08	0-40	-	-	Negative
STP 09	0-80	Auger 05	80-160	Positive

Exhibit 3. Planview of STP 09 and Auger 05

Exploratory Trenches

Dudek excavated trenches DT-01 through DT-10 within the boundaries of CA-SDI-7208 and CA-SDI-11,424, but outside of the previously determined "significant/primary site area" for CA-SDI-11,424 (Figure 4; Confidential Appendix D). The long axis of all trenches were oriented north/south and were uniformly measured 46 cm wide, 120 cm deep, and varied between 300 and 380 cm long (Table 6; Exhibit 4). Dudek archaeologists dry-screened a 5-gallon sample of soil every 20 cm through 1/8in screen. The upper stratum of all trenches extended 20 to 30 cmbs and consisted of a light brown, loosely compacted, silty loam with no gravel. The next stratum consists of highly compacted, dark brown silty clay containing increasing levels of moisture. This stratum extended to depths as deep as 120 cmbs. A third stratum containing a yellow/tan brown clay loam was also identified between 78 and 120 cmbs. All trenches were negative for cultural resources except trench TR-04 which produced three metavolcanic lithic flakes located within the 20-40 cmbs testing bucket. Agricultural activities, such as the recent discing, are known to mix soils to depths beyond 40 cmbs. Since these upper soils are well mixed, it is likely that these artifacts have been displaced horizontally and vertically by repeated agricultural activities.

Table 6. Trench Exploratory Probes within Project APE

Trench #	Length (cm)	Within Resource	Cultural Material
TR-01	300	CA-SDI-7208; CA-SDI-11,424	Negative
TR-02	300	CA-SDI-7208; CA-SDI-11,424	Negative
TR-03	320	CA-SDI-7208; CA-SDI-11,424	Negative
TR-04	380	CA-SDI-7208; CA-SDI-11,424	Negative
TR-05	340	CA-SDI-7208	Negative
TR-06	300	CA-SDI-7208	Negative
TR-07	320	CA-SDI-7208	Negative
TR-08	310	CA-SDI-7208	Negative
TR-09	320	CA-SDI-7208	Negative
TR-10	320	CA-SDI-7208	Positive

Exhibit 4. View of TR-01, view east

5 Impact Analysis

CEQA Guidelines provide that a project that demolishes or alters those physical characteristics of an historical resource that convey its historical significance (i.e., its character-defining features) can be considered to materially impair the resource's significance. In order to best mitigate the effects of the proposed project on cultural resources, a reasonable, good faith effort must be applied to determining their archaeological character and eligibility for listing in the California Register of Historical Resources (CRHR). Of the four primary CRHR criteria for making such recommendations, Criterion 4 is most applicable for directing subsurface testing of the archaeological site (CA-SDI-7208 and CA-SDI-14,587) that intersects the APE. To be eligible for listing in the CRHR, a site must have "yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation" (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4852).

CA-SDI-7208

CA-SDI-7208 (P-37-007208) consists of a light prehistoric lithic scatter that expands a total of 725 acres, approximately 40 acres of which are within the current Project APE. CA-SDI-7208 has never been tested for significance under CEQA or the NRHP within current Project APE. Dudek conducted pedestrian survey of the Project APE which revealed limited, scattered lithic debitage. Considering the limited number of artifacts identified, their wide dispersal over the 40 acres, and the lack of any features, these artifacts are more akin to scattered isolate finds than a cultural resource site. To determine whether there was a subsurface component to the resource, Dudek conducted extended Phase I exploratory probes within the Project APE. These probes, including nine STPs and 10 trenches, revealed sediments consisted of silty clay loam that was greatly disturbed by previous agricultural activities. It appears that the extensive, but scant, lithic scatter within the Project APE is the result of artifact dispersal from agricultural activities rather than the presence of a stratified, subsurface cultural deposit.

Considering the extremely low yield of cultural material from the extended Phase I probes and the disturbed soils, CA-SDI-7208 does not possess a subsurface component within the current Project APE.

CA-SDI-11,424

CA-SDI-11,424 (P-37-11,424) was recorded as a large base camp/habitation site with hundreds of artifacts, shell, and subsurface midden deposits and has undergone previous archaeological testing. Based on the presence of an intact cultural deposit with a large quantity and wide range of artifacts, faunal remains, material for radiocarbon analysis, intact prehistoric features, and the potential to answer research questions, a "significant/primary site area" within CA-SDI-11,424 was previously recommended eligible for inclusion in the NRHP, and significant under City of San Diego and CEQA guidelines and consequently for listing in the CRHR (Kyle et al. 1997). The current study agrees with those finding and did not conduct any additional Phase I probing within the "significant/primary site area" (Figure 4; Confidential Appendix D). Because no previous testing has been conducted within the eastern extent of the recorded boundaries of CA-SDI-11,424, Dudek conducted extended Phase I subsurface probes to determine if this portion of the resource possessed a subsurface component that required evaluation testing. Project impacts to the previously untested portions of CA-SDI-11,424 and to the "significant/primary site area" portion of CA-SDI-11,424 (Kyle et al. 1997) are discussed separately below.

CA-SDI-11,424 Previously Untested Boundary

Dudek's conducted extended Phase I subsurface probes including nine STPs and four trenches within previously untested portions of CA-SDI-11,424. These subsurface probes revealed that the sediments consist of largely silty clay loam that was greatly disturbed by previous agricultural activities. These subsurface probes identified only a single metavolcanic lithic flake within the boundary of CA-SDI-11,424. It appears that the scant surface lithic scatter within the Project APE is the result of artifact dispersal from agricultural activities rather than the presence of a stratified, subsurface cultural deposit. Considering the extremely low yield of cultural material from the extended Phase I probes and the disturbed soils, CA-SDI-11,424 does not possess a subsurface component within the current Project APE, beyond the previously identified "significant/primary site area" (Kyle et al. 1997).

CA-SDI-11,424 "Significant/Primary Site Area"

Kyle et al. (1997) conduced surface collection and excavation of 27 STPs, 18 backhoe trenches, and 15 1x1 m test units at CA-SDI-11,424. They collected over 15,000 pieces of lithic debitage, 48 bifaces, 262 flake tools, 252 cores, 353 core/cobble tools, a cooking stone, 34 handstones, six milling stone fragments, unidentifiable ground stone, two shell beads, cooked bone, shell, and other artifacts. They also identified three hearth features and identified cultural midden deposits to a maximum depth of 140cm. Kyle et al. (1997) defined a "significant/primary site area" measuring 120 m north/south and 60 m east/west which encompassed the bulk of the identified cultural materials (Figure 4 in Confidential Appendix D). The large quantities and wide variety of cultural materials, midden soil, and three hearth features led Kyle et al. (1997) to recommend CA-SDI-11,424 as eligible for listing in the NRHP and significant under CEQA and City of San Diego guidelines.

The current study relies on the findings of Kyle et al. (1997). The "significant/primary site area," as defined by Kyle et al. (1997), encompassed the surface artifact scatter. Because the surface artifact scatter has been widely dispersed by repeated agricultural use, Dudek recommends that the significant portion of the resource is limited to that portion that contained the most productive of the subsurface excavations. After reviewing the cultural material yields from the 27 STPs, 18 backhoe trenches, and 15 1x1 m test units at CA-SDI-11,424, Dudek determined that a 4,500 sq. m portion of CA-SDI-11,424 contains intact subsurface cultural deposits that have yielded, and are likely to yield, information important in prehistory. Thus, Dudek recommends that this 4,500 sq. m portion of CA-SDI-11,424 contains the significant deposits that constitute the contributing element making the site eligible for listing in the NRHP and significant under CEQA and the City of San Diego guidelines (Figure 4 in Confidential Appendix D). The current Project cannot avoid impacts to the significant deposits, i.e. the contributing element, of CA-SDI-11,424.

Though CA-SDI-11,424 is eligible for listing in the NRHP and significant under CEQA and the City of San Diego guidelines, further evaluation is necessary to determine if it meets the criteria for designation as a historical resource by the City of San Diego Historical Resources Board (HRB).

CA-SDI-11,424 City of San Diego Historic Resources Board Evaluation

City of San Diego's *Guidelines for the Application of Historical Resources Board Designation Criteria* (City of San Diego 2007) provides guidance on the application of the evaluation under which CA-SDI-11,424 may qualify to be historically designated. The Historical Resources Board (HRB) guidelines state that the significance of a resource is determined by following three steps: first, identify the historic context with which the resource is associated; second, evaluate the resource's history to determine whether it is associated with the historic context in any important way

by applying the HRB Criteria and identify the period of significance in which the resource is important; and last, assess the resource's historic integrity (City of San Diego 2007).

The historic context of CA-SDI-11,424 was revealed though archaeological investigation. Archaeological excavations and analysis of cultural materials suggest that CA-SDI-11,424 was an Early to Middle Holocene prehistoric habitation site with radiocarbon dates ranging from approximately 3,300 to 7,600 years ago (Kyle et al. 1997). The large quantity and use ware of core/cobble tools and flake tools suggests that the working of soft woods and reeds were an important focus, and the site likely centered on the processing of plant and/or material resources. The presence of hearth features and food refuse are interpreted as support activities for wood/reed processing activities (Kyle et al. 1997).

Understanding its historical context, CA-SDI-11,424 must be evaluated to determine whether it is associated with the historic context in any important way by applying the HRB Criteria.

Criterion A. ***Exemplified 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.***

CA-SDI-11,424 is an example of an Early to Middle Holocene prehistoric workstation/habitation site. The tool assemblage and use ware suggest the processing of soft woods, while the food refuse and hearth features suggest encampment rather than a single use workstation. Though CA-SDI-11,424 exemplifies an Early to Middle Holocene prehistoric habitation site, it does not reflect "special elements" of the community's archaeological development. As stipulated in the HRB guidelines, it is not enough for a resource to simply reflect an aspect of development, but it must exemplify or reflect *special elements* that are distinct from others of its kind or surpass the usual in significance (City of San Diego 2007). Excavations of CA-SDI-11,424 produced radiocarbon dates between 3380+/- 100 BP and 7240 =/- 80 BP, dates which "fit well with other dates obtained from other sites on Otay Mesa" (Kyle et al 1997). The large quantities and wide variety of cultural materials, midden soil, and three hearth features led Kyle et al. (1997) to recommend CA-SDI-11,424 as significant because it has the potential to answer questions about prehistory in Otay Mesa. Though the resource is significant for its research potential, it is not distinct from nor surpass other similar Early to Middle Holocene prehistoric encampments on Otay Mesa. As such, CA-SDI-11,424 does not exemplify or reflect special elements of the community's archaeological development and does not qualify to be historically designated under Criterion A.

Criterion B. ***Identified with persons or events significant in local, state or national history.***

CA-SDI-11,424 is an example of an Early to Middle Holocene prehistoric workstation/habitation site. The artifact assemblage and features are ubiquitous among other prehistoric sites with similar function. CA-SDI-11,424 cannot be associated with specific persons or events significant to local, state, or national history and does not qualify to be historically designated under Criterion B.

Criterion 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.***

CA-SDI-11,424 is an example of an Early to Middle Holocene prehistoric workstation/habitation site. Excavations did not reveal that the resources was arranged with a specific design and only three features were identified consisting of three hearth features. These features did not show any distinctive characteristics of style, type, period, or method and do not qualify the resource to be historically designated under Criterion C.

Criterion D. ***Is representative of the notable work or a master builder, designer, architect, engineer, landscape architect, interior designer, artist, or craftsman.***

CA-SDI-11,424 is an example of an Early to Middle Holocene prehistoric workstation/habitation site. Excavations did not reveal that the resources was arranged with a specific design and only three features were identified consisting of three hearth features. These features are not representative of a master builder, designer, architect, engineer, landscape architect, interior designer, artist, or craftsman and do not qualify the resource to be historically designated under Criterion D.

Criterion 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.***

Kyle et al. (1997) conducted surface collection and excavation of 27 STPs, 18 backhoe trenches, and 15 1x1 m test units at CA-SDI-11,424. They collected over 15,000 pieces of lithic debitage, 48 bifaces, 262 flake tools, 252 cores, 353 core/cobble tools, a cooking stone, 34 handstones, six milling stone fragments, unidentifiable ground stone, two shell beads, cooked bone, shell, and other artifacts. They also identified three hearth features and identified cultural midden deposits to a maximum depth of 140cm. Based on the presence of an intact cultural deposit with a large quantity and wide range of artifacts, faunal remains, material for radiocarbon analysis, intact prehistoric features, and the potential to answer research questions, CA-SDI-11,424 was recommended eligible for inclusion in the NRHP, and significant under City of San Diego and CEQA guidelines and consequently for listing in the CRHR (Kyle et al. 1997). Though recommended eligible by Kyle et al. (1997), CA-SDI-11,424 is not listed in the NRHP and no determination of eligibility by the National Park Service can be found. As such, CA-SDI-11,424 does not qualify to be historically designated under Criterion E.

Criterion 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.***

CA-SDI-11,424 is an example of an Early to Middle Holocene prehistoric workstation/habitation site with radiocarbon dates between 3380+/- 100 BP and 7240 =/- 80 BP, dates which "fit well with other dates obtained from other sites on Otay Mesa" (Kyle et al 1997). Though these resources are similar in age, there is no known associations between the resources. There is no special character that represents a style in the history and development of the community. As such, CA-SDI-11,424 does not qualify to be historically designated under Criterion F.

CA-SDI-11,424 does not qualify for historical designation under any of the HRB Criteria, however, it should be noted that it does maintain an aspect of integrity as dictated by the HRB guidelines (City of San Diego 2007). The NRHP and the CRHR recognize **design, setting, materials, workmanship, feelings, association, and location** as the seven

aspects of historical integrity. Archaeological excavations at CA-SDI-11,424 did not reveal any intentional **design** of the prehistoric workstation/habitation. All properties immediately surrounding CA-SDI-11,424 have been completely altered since the creation of the site, including recycling yard, residential buildings, and a major freeway, thus losing integrity of **setting.** Archaeological excavations at CA-SDI-11,424 only revealed three features, simple, deflated stone rock features, lacking the complexity for the integrity of **materials** or **workmanship**. The surface of CA-SDI-11,424 has been highly altered by repeated agricultural use and there are no physical features to convey a **feeling** or historic sense of a past time or place. CA-SDI-11,424 is a ubiquitous prehistoric workstation and does not demonstrate an **association** with a historic event, activity, or person of the past.

Though the surface and topmost deposits of CA-SDI-11,424 have been dispersed by repeated agricultural activities, archaeological evaluation identified intact cultural deposits and midden soils between 40 and 140 cmbs (Kyle et al. 1997). These intact deposits have maintained their integrity of **location.** As stated in the HRB guidelines, certain aspects of integrity are more important than others to express the historic significance of a resource type. Integrity of location is key in demonstrating the importance of an archaeological site. It is because of CA-SDI-11,424's retained integrity of location that it is eligible for listing on the NRHP and CRHP under Criteria D and 4, respectively.

In summation, CA-SDI-11,424 and its buried, undisturbed, rich cultural deposits maintain integrity of location and were therefore recommended eligible for the NRHP and significant under CEQA and the City of San Diego guidelines. However, though significant for its archaeological research potential, CA-SDI-11,424 does not exemplify any *special elements* that would make it eligible for historical designated under any of the HRB Criteria.

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6 Conclusions and Recommendations

6.1 Summary and Management Considerations

SCIC records identified two previously recorded cultural resources, CA-SDI-7208 and CA-SDI-11,424, intersecting the Project APE. CA-SDI-7208 is a sparce prehistoric lithic scatters while CA-SDI-11,424 is a prehistoric campsite/habitation site. Portions of CA-SDI-7208 were tested and recommended not significant under CEQA and not eligible for listing on the NRHP (Hector 1986; Cheever and Davis 1988). Large portions of the resource have not been tested to determine its significance under CEQA or eligibility to the NRHP or CRHR, and the previous evaluations were not located within the proposed current Project APE boundary. CA-SDI-11,424 was tested and was recommended as eligible for nomination to the NRHR and consequently, eligible for listing in the CRHR (Kyle et al. 1997).

Dudek conducted an intensive pedestrian survey of the entire Project APE and the areas of the previously recorded sites, CA-SDI-7208 and CA-SDI-11,424 within the Project APE boundary. A total of 26 individual lithic artifacts were scattered throughout the APE and an additional cluster of 13 lithic artifacts identified within 315 -square meter area, identified as CC-S-001. All 39 artifacts identified within CA-SDI-7208 (29 of which were also identified within CA-SDI-11,424) were located on the recently plowed ground surface in a disturbed context. No archaeological features or midden were distinguishable on the disturbed ground surface. It is likely that the repeated agricultural development and previous cultural studies have obscured all surface manifestations of cultural deposits.

Dudek conducted extended Phase I subsurface probes within previously unevaluated portions of CA-SDI-7208 and CA-SDI-11,424 to determine if these portions of the resources possess subsurface components that required evaluation testing. These probes, including nine STPs and ten trenches, revealed that sediments consisted of largely silty clay loam that was greatly disturbed by previous agricultural activities. These subsurface probes identified only four metavolcanic lithic flakes whose dispersal horizontally and vertically are likely the result of repeated agricultural activity.

Considering the extremely low yield of cultural material from the extended Phase I probes and the disturbed soils, previously unevaluated portions of CA-SDI-7208 and CA-SDI-11,424 do not possess a subsurface component within the current Project APE, beyond the previously identified "significant/primary site area" of CA-SDI-11,424 identified by Kyle et al. (1997). Without subsurface components, Dudek does not recommend archaeological evaluation testing of CA-SDI-7208 within the Project APE nor the portions of CA-SDI-11,424 outside of the previously identified "significant/primary site area" (Kyle et al. 1997).

Reviewing the results of Kyle et al. (1997) evaluation testing, Dudek determined that a 4,500 sq. m portion of CA-SDI-11,424 contains intact subsurface cultural deposits that have yielded, and are likely to yield, information important in prehistory. Thus, Dudek recommends that this 4,500 sq. m portion of CA-SDI-11,424 constitutes the contributing element that makes the site eligible for listing in the NRHP and significant under CEQA and the City of San Diego guidelines (Figure 4 in Confidential Appendix D). The current Project cannot avoid impacts to these significant deposits of CA-SDI-11,424. The *City of San Diego Historical Resources Guidelines* (City of San Diego 2022b) states that development within an important archaeological site is permitted, if necessary, up to 25 percent encroachment. The current Project proposes 100 percent encroachment into CA-SDI-11,424.

Though CA-SDI-11,424 is eligible for listing in the NRHP and significant under CEQA and the City of San Diego guidelines due to its research potential, it does not exemplify any *special elements* that would make it eligible for historical designated under any of the HRB Criteria.

Dudek recommends that the significant deposits (Figure 4 in Confidential Appendix D), as the contributing element of CA-SDI-11,424, require data recovery in compliance with the City of San Diego's Historical Resources Guidelines (2022b) as specified in the data recovery program developed for CA-SDI-11,424 (Appendix E). Also, Dudek recommends archaeological and Native American monitoring during initial ground disturbing construction activities throughout the Project APE.

6.2 Mitigation Measures

The mitigation measures below have been designed to fulfill the requirements of the CEQA Statutes and Guidelines and the City's Historical Resources Guidelines (2022b). The City would be the lead agency implementing all mitigation measures.

MM-CR-1 Data Recovery of Significant Deposits of CA-SDI-11,424:

Should implementation of the Project directly impact the significant deposits of CA-SDI-11,424, a data recovery program will be implemented at the site prior to approval of any grading or improvement plans that would cause the direct impact. The research design and data recovery program are included as Appendix E of this report. All data recovery shall include a Kumeyaay Native American monitor.

MM-CR-2 Construction Monitoring:

The following monitoring program shall be implemented to protect unknown archaeological or tribal cultural resources that may be encountered during construction or other ground-disturbing phases of a Project.

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 Environmental Designee (ED) 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 ED

1. Prior to Bid Award, the applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project 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 all persons involved in the archaeological monitoring of the project meet the qualifications established in the HRG.

3. Prior to the start of work, the applicant must obtain written approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

A. Verification of Records Search

1. The PI shall provide verification to MMC that a site-specific records search (1/8-mile radius) has been completed. Verification includes, but is not limited to a copy of a confirmation letter from 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 1/8 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), Building Inspector (BI), if appropriate, 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 (Capital Improvement Projects 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
    a. 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.
    b. 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).
    c. MMC shall notify the PI that the AME has been approved.
4. When Monitoring Will Occur
    a. Prior to the start of 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 review of final construction documents that indicate conditions such as age of 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 approval of the AME by MMC, 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 (CSVR). The CSVR's shall be emailed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly, 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 Monitor is the PI) of the discovery.
3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by email with photos of the resource in context, if possible.

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 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 application may be required to pay to cover mitigation costs as indicated in CEQA Section 21083.2 shall not apply.**
    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 that no further work is required.

D. Discovery Process for Significant Resources - Pipeline Trenching and other Linear Projects in the Public Right-of-Way

The following procedure constitutes adequate mitigation of a significant discovery encountered during pipeline trenching activities or for other linear project types within the Public Right-of-Way including but not limited to excavation for jacking pits, receiving pits, laterals, and manholes to reduce impacts to below a level of significance:

1. Procedures for documentation, curation and reporting
    a. One hundred percent of the artifacts within the trench alignment and width shall be documented in-situ, to include photographic records, plan view of the trench and profiles of side walls, recovered, photographed after cleaning and analyzed and curated. The remainder of the deposit within the limits of excavation (trench walls) shall be left intact.
    b. The PI shall prepare a Draft Monitoring Report and submit to MMC via the RE as indicated in Section VI-A.
    c. The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) the resource(s) encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines. The DPR forms shall be submitted to the South Coastal Information Center for either a Primary Record or SDI Number and included in the Final Monitoring Report.
    d. The Final Monitoring Report shall include a recommendation for monitoring of any future work in the vicinity of the resource.

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 (PRC) (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken:

A. Notification

1. Archaeological Monitor shall notify the RE or BI as appropriate, MMC, and the PI, if the Monitor is not qualified as a PI. MMC will notify the appropriate Senior Planner in the Environmental Analysis Section (EAS) of the Development Services Department 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 notified by the Commission, 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, 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.

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 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.

D. 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 internment of the human remains shall be made in consultation with MMC, EAS, 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 CSVR and submit to MMC via email by 8:00 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 8:00 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, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
2. The RE, or BI, as appropriate, 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 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 Archaeological Data Recovery Program or Pipeline Trenching Discovery Process shall be included in the Draft Monitoring Report.
    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 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 or BI, as appropriate, 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 catalogued
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 catalogue 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 signature on the Accession Agreement and shall return to PI with 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 or BI and MMC.

D. Final Monitoring Report(s)

1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to MMC (even if negative), within 90 days after notification from MMC of the approved report.
2. The RE shall, in no case, 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

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7 References

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8 National Archaeological Database (NADB) Information

Authors:	Keshia Montifolca, MA, RPA, Matthew DeCarlo, MA, RPA, Brad Comeau, MSc, RPA, and Micah Hale, PhD, RPA
Firm:	Dudek
Project Proponent:	JPI Real Estate Acquisition, LLC
Report Date:	May 2025
Report Title:	Cultural Resources Extended Phase I Inventory Report for The Collection at Cactus Apartment Project, City of San Diego, California
Type of Study:	Cultural Resources Extended Phase I Inventory
New Sites:	N/A
USGS Quads:	Otay Mesa, CA 7.5', T18S, R1W, Section 33
Acreage:	40
Keywords:	Positive; The Collection at Cactus Apartment; City of San Diego; CA-SDI-7208; CA-SDI-11,424; prehistoric; lithic scatter; temporary campsite

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9 Certification

Preparer: Matthew DeCarlo, M.A., RPA	**Title:** Archaeologist
Signature: 	**Date:** May 30, 2025

Appendix A

(Confidential) SCIC Records Search Results

Appendix B
NAHC and Tribal Correspondence

From: NAHC@NAHC <NAHC@nahc.ca.gov>
Sent: Wednesday, May 24, 2023 3:14 PM
To: Matthew DeCarlo
Cc: Torres-Fuentes, Pricilla@NAHC
Subject: RE: Sacred Lands File Search for The Collection at Cactus Project
Attachments: Cultural_Resources_Records_Search.pdf; Sacred Lands File Contact Form.pdf

Hello,

Thank you for your message. We're in receipt of your request. We have recently hired new staff, and
this change in our office is creating some delays. We estimate a turn-around time of 4 weeks and don't
anticipate responding sooner than the end of that time frame. Please let us know if you have any
questions.

Kind regards,

Native American Heritage Commission
1550 Harbor Blvd, Suite 100
West Sacramento, CA 95691
(916) 373-3710

From: Matthew DeCarlo <mdecarlo@dudek.com>
Sent: Tuesday, May 23, 2023 1:26 PM
To: NAHC@NAHC <NAHC@nahc.ca.gov>
Subject: Sacred Lands File Search for The Collection at Cactus Project

Hello,
Dudek is conducting a cultural resources inventory for the Collection at Cactus Project in San Diego
County. May I please request a search of the Sacred Lands File for the project area and a 1-mile radius?

Please let me know if you need any additional information.
Thank you.
-Matt

Matthew M. DeCarlo, MA
Archaeologist

605 Third Street, Encinitas, CA 92024
O: 760.479.4831 C: 760.815.7067
www.mdecarlo@dudek.com

Sacred Lands File & Native American Contacts List Request

NATIVE AMERICAN HERITAGE COMMISSION
1550 Harbor Blvd, Suite 100
West Sacramento, CA 95501
(916) 373-3710
(916) 373-5471 – Fax
nahc@nahc.ca.gov

Information Below is Required for a Sacred Lands File Search

Project: The Collection at Cactus Project - Dudek No. 14386.07
County: San Diego

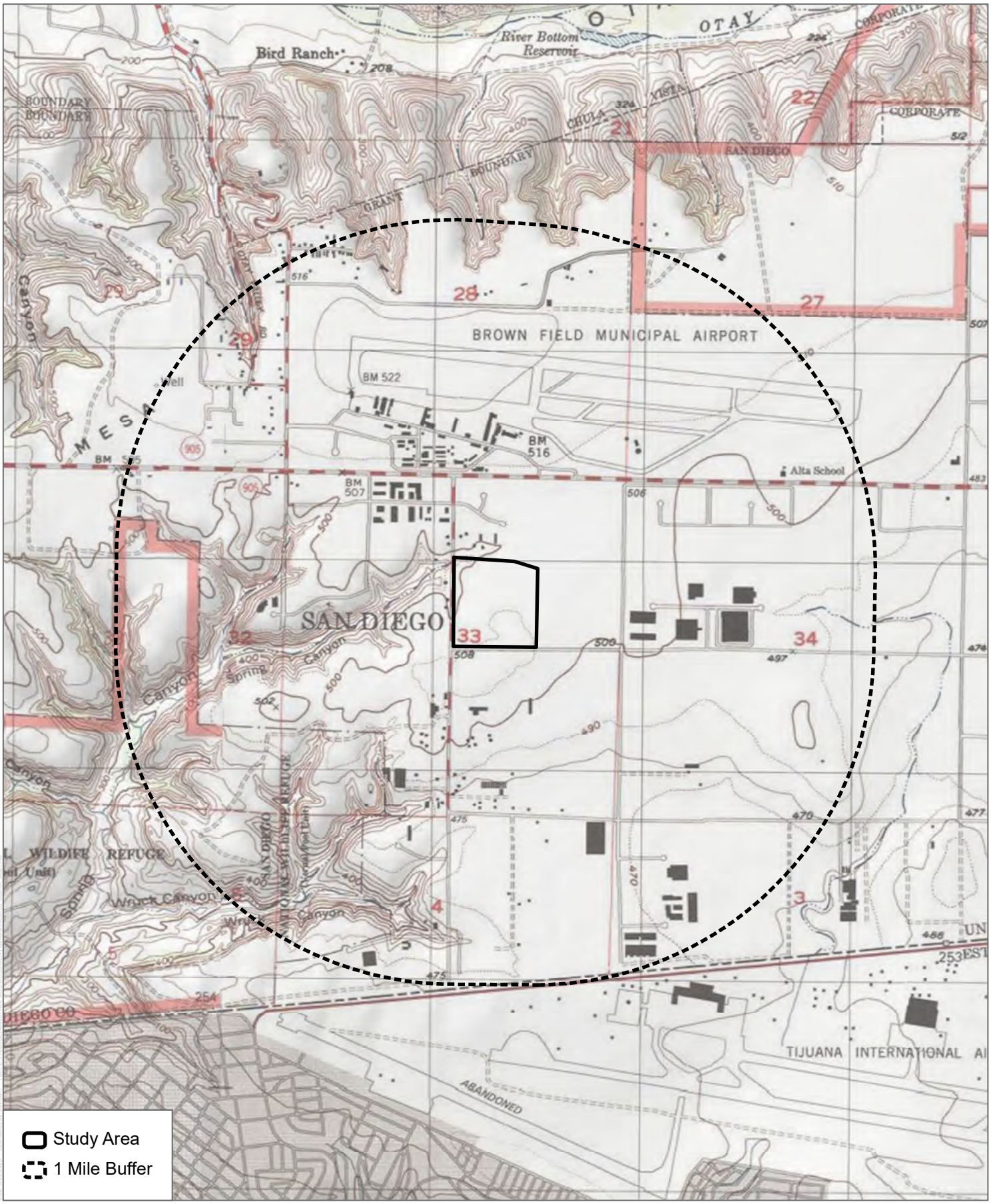
USGS Quadrangle
Name: Otay Mesa
Township: 18S Range: 1W Section(s): 33

Company/Firm/Agency:
Dudek

Contact Person: Matthew DeCarlo
Street Address: 605 Third Street
City: Encinitas, CA Zip: 92024
Phone: (760) 815-7067 Extension:
Fax: (760) 632-0164
Email: mdecarlo@dudek.com

Project Description:
Proposed residential development of a currently undeveloped 40-acre lot.

☑ Project Location Map is attached



SOURCE: USGS 7.5-Minute Series Otay Mesa & Imperial Beach Quadrangles
Township 18S, 19S; Range 1W; Sections 3, 4, 5, 27, 28, 29, 32, 33, 34

DUDEK

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

Cultural Resources Records Search

The Collection at Cactus

NATIVE AMERICAN HERITAGE COMMISSION

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

June 21, 2023

Matthew DeCarlo
Dudek

Via Email to: mdecarlo@dudek.com

Re: The Collection at Cactus Project, San Diego County

Dear Mr. Decarlo:

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
6/21/2023
*Federally Recognized Tribe

Barona Group of the Capitan Grande
Raymond Welch, Chairperson
1095 Barona Road — Diegueno
Lakeside, CA, 92040
Phone: (619) 443 - 6612
Fax: (619) 443-0681
counciloffice@barona-nsn.gov

Campo Band of Diegueno Mission Indians
Ralph Goff, Chairperson
36190 Church Road, Suite 1 — Diegueno
Campo, CA, 91906
Phone: (619) 478 - 9046
Fax: (619) 478-5818
rgoff@campo-nsn.gov

Ewiiaapaayp Band of Kumeyaay Indians
Robert Pinto, Chairperson
4054 Willows Road — Diegueno
Alpine, CA, 91901
Phone: (619) 368 - 4382
Fax: (619) 445-9126
ceo@ebki-nsn.gov

Ewiiaapaayp Band of Kumeyaay Indians
Michael Garcia, Vice Chairperson
4054 Willows Road — Diegueno
Alpine, CA, 91901
Phone: (619) 933 - 2200
Fax: (619) 445-9126
michaelg@leaningrock.net

Iipay Nation of Santa Ysabel
Clint Linton, Director of Cultural Resources
P.O. Box 507 — Diegueno
Santa Ysabel, CA, 92070
Phone: (760) 803 - 5694
clint@redtailenvironmental.com

Iipay Nation of Santa Ysabel
Virgil Perez, Chairperson
P.O. Box 130 — Diegueno
Santa Ysabel, CA, 92070
Phone: (760) 765 - 0845
Fax: (760) 765-0320

Inaja-Cosmit Band of Indians
Rebecca Osuna, Chairperson
2005 S. Escondido Blvd. — Diegueno
Escondido, CA, 92025
Phone: (760) 737 - 7628
Fax: (760) 747-8568

Jamul Indian Village
Erica Pinto, Chairperson
P.O. Box 612 — Diegueno
Jamul, CA, 91935
Phone: (619) 669 - 4785
Fax: (619) 669-4817
epinto@jiv-nsn.gov

Jamul Indian Village
Lisa Cumper, Tribal Historic Preservation Officer
P.O. Box 612 — Diegueno
Jamul, CA, 91935
Phone: (619) 669 - 4855
lcumper@jiv-nsn.gov

Kwaaymii Laguna Band of Mission Indians
Carmen Lucas,
P.O. Box 775 — Kwaaymii
Pine Valley, CA, 91962 — Diegueno
Phone: (619) 709 - 4207

La Posta Band of Diegueno Mission Indians
Gwendolyn Parada, Chairperson
8 Crestwood Road — Diegueno
Boulevard, CA, 91905
Phone: (619) 478 - 2113
Fax: (619) 478-2125
LP13boots@aol.com

La Posta Band of Diegueno Mission Indians
Javaughn Miller, Tribal Administrator
8 Crestwood Road — Diegueno
Boulevard, CA, 91905
Phone: (619) 478 - 2113
Fax: (619) 478-2125
jmiller@LPtribe.net

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 The Collection at Cactus Project, San Diego County.

Native American Heritage Commission
Native American Contact List
San Diego County
6/21/2023
*Federally Recognized Tribe

Manzanita Band of Kumeyaay Nation
Angela Elliott Santos, Chairperson
P.O. Box 1302 Diegueno
Boulevard, CA, 91905
Phone: (619) 766 - 4930
Fax: (619) 766-4957

Mesa Grande Band of Diegueno Mission Indians
Michael Linton, Chairperson
P.O Box 270 Diegueno
Santa Ysabel, CA, 92070
Phone: (760) 782 - 3818
Fax: (760) 782-9092
mesagrandeband@msn.com

San Pasqual Band of Diegueno Mission Indians
Allen Lawson, Chairperson
P.O. Box 365 Diegueno
Valley Center, CA, 92082
Phone: (760) 749 - 3200
Fax: (760) 749-3876
allenl@sanpasqualtribe.org

San Pasqual Band of Diegueno Mission Indians
John Flores, Environmental Coordinator
P. O. Box 365 Diegueno
Valley Center, CA, 92082
Phone: (760) 749 - 3200
Fax: (760) 749-3876
johnf@sanpasqualtribe.org

Sycuan Band of the Kumeyaay Nation
Cody Martinez, Chairperson
1 Kwaaypaay Court Kumeyaay
El Cajon, CA, 92019
Phone: (619) 445 - 2613
Fax: (619) 445-1927
ssilva@sycuan-nsn.gov

Sycuan Band of the Kumeyaay Nation
Kristie Orosco, Kumeyaay Resource Specialist
1 Kwaaypaay Court Kumeyaay
El Cajon, CA, 92019
Phone: (619) 445 - 6917

Viejas Band of Kumeyaay Indians
Ernest Pingleton, Tribal Historic Officer, Resource Management
1 Viejas Grade Road Diegueno
Alpine, CA, 91901
Phone: (619) 659 - 2314
epingleton@viejas-nsn.gov

Viejas Band of Kumeyaay Indians
John Christman, Chairperson
1 Viejas Grade Road Diegueno
Alpine, CA, 91901
Phone: (619) 445 - 3810
Fax: (619) 445-5337

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 The Collection at Cactus Project, San Diego County.

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

May 17, 2024 14386.07

Mr. Raymond Welch, Chairperson
Barona Group of the Capitan Grande
1095 Barona Road
Lakeside, CA 92040

Subject: Information Request for the Collection at Cactus Apartment Project, City of San Diego, California

Dear Mr. Welch,

The Collection at Cactus Apartment Project (project) is located east of Cactus Road, west of Continental Road, north of Airway Road, and south of State Route 905, in the City of San Diego, California. The proposed project would develop 962 multifamily residential units. The project falls in Section 33, Township 18 South, Range 1 West of the Otay Mesa, CA U.S. Geological Service (USGS) 7.5-minute series topographic Quadrangle map (Figure 1).

The Native American Heritage Commission conducted a Sacred Lands file search. The results were negative. I am writing as part of the cultural inventory process in order find out if you, or your tribal community, have any knowledge of cultural resources or places that may be impacted by the proposed project.

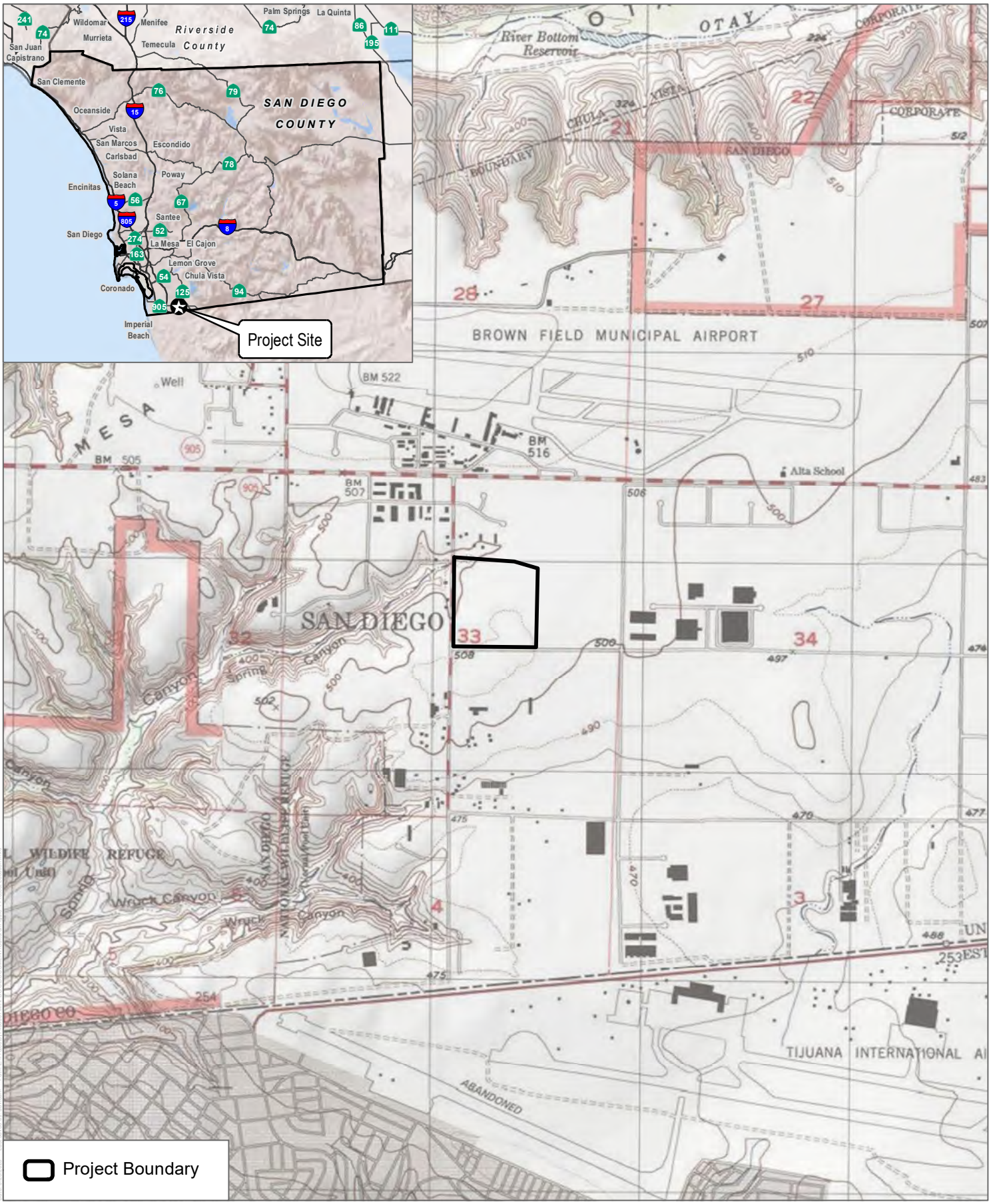
Please note that this letter does not constitute Assembly Bill (AB) 52 notification or initiation of consultation. AB 52 is a process between the lead agency and California Native American Tribes concerning potential impacts to tribal cultural resources.

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

Respectfully,

Keshia Montifolca
Archaeologist
DUDEK
Phone: 619.949.3082
Email: kmontifolca@dudek.com

Attachment: Figure 1. Project Location



SOURCE: USGS 7.5-Minute Series Otay Mesa Quadrangle
Township 18S/ Range 1W/ Section 33

DUDEK

0 300 600 Meters

FIGURE 1

Project Location

The Collection at Cactus

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

May 17, 2024 14386.07

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

Subject: Information Request for the Collection at Cactus Apartment Project, City of San Diego, California

Dear Mr. Goff,

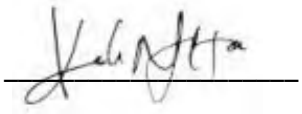
The Collection at Cactus Apartment Project (project) is located east of Cactus Road, west of Continental Road, north of Airway Road, and south of State Route 905, in the City of San Diego, California. The proposed project would develop 962 multifamily residential units. The project falls in Section 33, Township 18 South, Range 1 West of the Otay Mesa, CA U.S. Geological Service (USGS) 7.5-minute series topographic Quadrangle map (Figure 1).

The Native American Heritage Commission conducted a Sacred Lands file search. The results were negative. I am writing as part of the cultural inventory process in order find out if you, or your tribal community, have any knowledge of cultural resources or places that may be impacted by the proposed project.

Please note that this letter does not constitute Assembly Bill (AB) 52 notification or initiation of consultation. AB 52 is a process between the lead agency and California Native American Tribes concerning potential impacts to tribal cultural resources.

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

Respectfully,



Keshia Montifolca
Archaeologist
DUDEK
Phone: 619.949.3082
Email: kmontifolca@dudek.com

Attachment: Figure 1. Project Location

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

May 17, 2024 14386.07

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

Subject: Information Request for the Collection at Cactus Apartment Project, City of San Diego, California

Dear Mr. Pinto,

The Collection at Cactus Apartment Project (project) is located east of Cactus Road, west of Continental Road, north of Airway Road, and south of State Route 905, in the City of San Diego, California. The proposed project would develop 962 multifamily residential units. The project falls in Section 33, Township 18 South, Range 1 West of the Otay Mesa, CA U.S. Geological Service (USGS) 7.5-minute series topographic Quadrangle map (Figure 1).

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May 17, 2024 14386.07

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

Subject: Information Request for the Collection at Cactus Apartment Project, City of San Diego, California

Dear Mr. Garcia,

The Collection at Cactus Apartment Project (project) is located east of Cactus Road, west of Continental Road, north of Airway Road, and south of State Route 905, in the City of San Diego, California. The proposed project would develop 962 multifamily residential units. The project falls in Section 33, Township 18 South, Range 1 West of the Otay Mesa, CA U.S. Geological Service (USGS) 7.5-minute series topographic Quadrangle map (Figure 1).

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May 17, 2024 14386.07

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

Subject: Information Request for the Collection at Cactus Apartment Project, City of San Diego, California

Dear Mr. Perez,

The Collection at Cactus Apartment Project (project) is located east of Cactus Road, west of Continental Road, north of Airway Road, and south of State Route 905, in the City of San Diego, California. The proposed project would develop 962 multifamily residential units. The project falls in Section 33, Township 18 South, Range 1 West of the Otay Mesa, CA U.S. Geological Service (USGS) 7.5-minute series topographic Quadrangle map (Figure 1).

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May 17, 2024 14386.07

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

Subject: Information Request for the Collection at Cactus Apartment Project, City of San Diego, California

Dear Ms. Osuna,

The Collection at Cactus Apartment Project (project) is located east of Cactus Road, west of Continental Road, north of Airway Road, and south of State Route 905, in the City of San Diego, California. The proposed project would develop 962 multifamily residential units. The project falls in Section 33, Township 18 South, Range 1 West of the Otay Mesa, CA U.S. Geological Service (USGS) 7.5-minute series topographic Quadrangle map (Figure 1).

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May 17, 2024 14386.07

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

Subject: Information Request for the Collection at Cactus Apartment Project, City of San Diego, California

Dear Mr. Linton,

The Collection at Cactus Apartment Project (project) is located east of Cactus Road, west of Continental Road, north of Airway Road, and south of State Route 905, in the City of San Diego, California. The proposed project would develop 962 multifamily residential units. The project falls in Section 33, Township 18 South, Range 1 West of the Otay Mesa, CA U.S. Geological Service (USGS) 7.5-minute series topographic Quadrangle map (Figure 1).

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May 17, 2024 14386.07

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

Subject: Information Request for the Collection at Cactus Apartment Project, City of San Diego, California

Dear Ms. Pinto,

The Collection at Cactus Apartment Project (project) is located east of Cactus Road, west of Continental Road, north of Airway Road, and south of State Route 905, in the City of San Diego, California. The proposed project would develop 962 multifamily residential units. The project falls in Section 33, Township 18 South, Range 1 West of the Otay Mesa, CA U.S. Geological Service (USGS) 7.5-minute series topographic Quadrangle map (Figure 1).

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T 800.450.1818 F 760.632.0164

May 17, 2024 14386.07

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

Subject: Information Request for the Collection at Cactus Apartment Project, City of San Diego, California

Dear Ms. Cumper,

The Collection at Cactus Apartment Project (project) is located east of Cactus Road, west of Continental Road, north of Airway Road, and south of State Route 905, in the City of San Diego, California. The proposed project would develop 962 multifamily residential units. The project falls in Section 33, Township 18 South, Range 1 West of the Otay Mesa, CA U.S. Geological Service (USGS) 7.5-minute series topographic Quadrangle map (Figure 1).

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Attachment: Figure 1. Project Location

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May 17, 2024 14386.07

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

Subject: Information Request for the Collection at Cactus Apartment Project, City of San Diego, California

Dear Ms. Lucas,

The Collection at Cactus Apartment Project (project) is located east of Cactus Road, west of Continental Road, north of Airway Road, and south of State Route 905, in the City of San Diego, California. The proposed project would develop 962 multifamily residential units. The project falls in Section 33, Township 18 South, Range 1 West of the Otay Mesa, CA U.S. Geological Service (USGS) 7.5-minute series topographic Quadrangle map (Figure 1).

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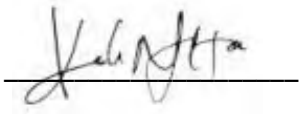

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May 17, 2024 14386.07

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

Subject: Information Request for the Collection at Cactus Apartment Project, City of San Diego, California

Dear Ms. Parada,

The Collection at Cactus Apartment Project (project) is located east of Cactus Road, west of Continental Road, north of Airway Road, and south of State Route 905, in the City of San Diego, California. The proposed project would develop 962 multifamily residential units. The project falls in Section 33, Township 18 South, Range 1 West of the Otay Mesa, CA U.S. Geological Service (USGS) 7.5-minute series topographic Quadrangle map (Figure 1).

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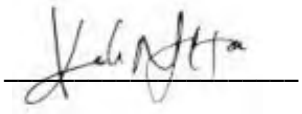

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T 800.450.1818 F 760.632.0164

May 17, 2024 14386.07

Ms. Javaughn Miller, Tribal Administrator
La Posta Band of Diegueno Mission Indians
8 Crestwood Rd.
Boulevard, CA 91905

Subject: Information Request for the Collection at Cactus Apartment Project, City of San Diego, California

Dear Ms. Miller,

The Collection at Cactus Apartment Project (project) is located east of Cactus Road, west of Continental Road, north of Airway Road, and south of State Route 905, in the City of San Diego, California. The proposed project would develop 962 multifamily residential units. The project falls in Section 33, Township 18 South, Range 1 West of the Otay Mesa, CA U.S. Geological Service (USGS) 7.5-minute series topographic Quadrangle map (Figure 1).

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Archaeologist
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Email: kmontifolca@dudek.com

Attachment: Figure 1. Project Location

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

May 17, 2024 14386.07

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

Subject: Information Request for the Collection at Cactus Apartment Project, City of San Diego, California

Dear Ms. Santos,

The Collection at Cactus Apartment Project (project) is located east of Cactus Road, west of Continental Road, north of Airway Road, and south of State Route 905, in the City of San Diego, California. The proposed project would develop 962 multifamily residential units. The project falls in Section 33, Township 18 South, Range 1 West of the Otay Mesa, CA U.S. Geological Service (USGS) 7.5-minute series topographic Quadrangle map (Figure 1).

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T 800.450.1818 F 760.632.0164

May 17, 2024 14386.07

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

Subject: Information Request for the Collection at Cactus Apartment Project, City of San Diego, California

Dear Mr. Linton,

The Collection at Cactus Apartment Project (project) is located east of Cactus Road, west of Continental Road, north of Airway Road, and south of State Route 905, in the City of San Diego, California. The proposed project would develop 962 multifamily residential units. The project falls in Section 33, Township 18 South, Range 1 West of the Otay Mesa, CA U.S. Geological Service (USGS) 7.5-minute series topographic Quadrangle map (Figure 1).

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T 800.450.1818 F 760.632.0164

May 17, 2024 14386.07

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 Collection at Cactus Apartment Project, City of San Diego, California

Dear Mr. Lawson,

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May 17, 2024 14386.07

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 Collection at Cactus Apartment Project, City of San Diego, California

Dear Mr. Flores,

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T 800.450.1818 F 760.632.0164

May 17, 2024 14386.07

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

Subject: Information Request for the Collection at Cactus Apartment Project, City of San Diego, California

Dear Mr. Martinez,

The Collection at Cactus Apartment Project (project) is located east of Cactus Road, west of Continental Road, north of Airway Road, and south of State Route 905, in the City of San Diego, California. The proposed project would develop 962 multifamily residential units. The project falls in Section 33, Township 18 South, Range 1 West of the Otay Mesa, CA U.S. Geological Service (USGS) 7.5-minute series topographic Quadrangle map (Figure 1).

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May 17, 2024 14386.07

Ms. Kristie Orosco, Resource Specialist
Sycuan Band of the Kumeyaay Nation
1 Kwaaypaay Court
El Cajon, CA 92019

Subject: Information Request for the Collection at Cactus Apartment Project, City of San Diego, California

Dear Ms. Orosco,

The Collection at Cactus Apartment Project (project) is located east of Cactus Road, west of Continental Road, north of Airway Road, and south of State Route 905, in the City of San Diego, California. The proposed project would develop 962 multifamily residential units. The project falls in Section 33, Township 18 South, Range 1 West of the Otay Mesa, CA U.S. Geological Service (USGS) 7.5-minute series topographic Quadrangle map (Figure 1).

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May 17, 2024 14386.07

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

Subject: Information Request for the Collection at Cactus Apartment Project, City of San Diego, California

Dear Mr. Pingleton,

The Collection at Cactus Apartment Project (project) is located east of Cactus Road, west of Continental Road, north of Airway Road, and south of State Route 905, in the City of San Diego, California. The proposed project would develop 962 multifamily residential units. The project falls in Section 33, Township 18 South, Range 1 West of the Otay Mesa, CA U.S. Geological Service (USGS) 7.5-minute series topographic Quadrangle map (Figure 1).

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Mr. John Christman, Chairperson
Viejas Band of Kumeyaay Indians
1 Viejas Grade Rd.
Alpine, CA 91901

Subject: Information Request for the Collection at Cactus Apartment Project, City of San Diego, California

Dear Mr. Christman,

The Collection at Cactus Apartment Project (project) is located east of Cactus Road, west of Continental Road, north of Airway Road, and south of State Route 905, in the City of San Diego, California. The proposed project would develop 962 multifamily residential units. The project falls in Section 33, Township 18 South, Range 1 West of the Otay Mesa, CA U.S. Geological Service (USGS) 7.5-minute series topographic Quadrangle map (Figure 1).

The Native American Heritage Commission conducted a Sacred Lands file search. The results were negative. I am writing as part of the cultural inventory process in order find out if you, or your tribal community, have any knowledge of cultural resources or places that may be impacted by the proposed project.

Please note that this letter does not constitute Assembly Bill (AB) 52 notification or initiation of consultation. AB 52 is a process between the lead agency and California Native American Tribes concerning potential impacts to tribal cultural resources.

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

Respectfully,

Keshia Montifolca
Archaeologist
DUDEK
Phone: 619.949.3082
Email: kmontifolca@dudek.com

Attachment: Figure 1. Project Location

Dudek
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Encinitas CA 92024

USPS CERTIFIED MAIL

9214 8901 9403 8362 1756 53

MR RAYMOND WELCH CHAIRPERSON
BARONA GROUP OF THE CAPITAN GRANDE
1095 BARONA RD
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USPS CERTIFIED MAIL

9214 8901 9403 8362 1756 84

MR RALPH GOFF CHAIRPERSON
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CAMPO CA 91906-2732

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9214 8901 9403 8362 1757 14

MR ROBERT PINTO CHAIRPERSON
EWIAAPAAYP BAND OF KUMEYAAY INDIANS
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MR MICHAEL GARCIA VICE CHAIRPERSON
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USPS CERTIFIED MAIL

9214 8901 9403 8362 1757 69

MR VIRGIL PEREZ CHAIRPERSON
IIPAY NATION OF SANTA YSABEL
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SANTA YSABEL CA 92070-0130

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USPS CERTIFIED MAIL

9214 8901 9403 8362 1760 56

MS REBECCA OSUNA CHAIRPERSON
INAJA-COSMIT BAND OF INDIANS
2005 S ESCONDIDO BLVD
ESCONDIDO CA 92025-8207

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9214 8901 9403 8362 1760 94

MR CLINT LINTON DIRECTOR OF CULTURAL RESOURCES
IPAY NATION OF SANTA YSABEL
PO BOX 507
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JAMUL CA 91935-0612

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USPS CERTIFIED MAIL

9214 8901 9403 8362 1761 17

MS LISA CUMPER THPO
PO BOX 612
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USPS CERTIFIED MAIL

9214 8901 9403 8362 1761 48

MS CARMEN LUCAS
KWAAYMII LAGUNA BAND OF MISSION INDIANS
PO BOX 775
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MS GWENDOLYN PARADA CHAIRPERSON
LA POSTA BAND OF DIEGUENO MISSION INDIANS
8 CRESTWOOD RD
BOULEVARD CA 91905-9725

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USPS CERTIFIED MAIL

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MS JAVAUGHN MILLER TRIBAL ADMINISTRATOR
LA POSTA BAND OF DIEGUENO MISSION INDIANS
8 CRESTWOOD RD
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USPS CERTIFIED MAIL

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MS ANGELA ELLIOTT SANTOS CHAIRPERSON
MANZANITA BAND OF KUMEYAAY NATION
PO BOX 1302
BOULEVARD CA 91905-0402

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USPS CERTIFIED MAIL

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MR MICHAEL LINTON CHAIRPERSON
MESA GRANDE BAND OF DIEGUNEO MISSION INDIANS
PO BOX 270
SANTA YSABEL CA 92070-0270

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MR ALLEN E LAWSON CHAIRPERSON
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PO BOX 365
VALLEY CENTER CA 92082-0365

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USPS CERTIFIED MAIL

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MR JOHN FLORES ENVIRONMENTAL COORDINATOR
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USPS CERTIFIED MAIL

9214 8901 9403 8362 1762 54

MR CODY MARTINEZ CHAIRPERSON
SYCUAN BAND OF THE KUMEYAAY NATION
1 KWAAYPAAY CT
EL CAJON CA 92019-1833

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USPS CERTIFIED MAIL

9214 8901 9403 8362 1762 61

MS KRISTIE OROSCO RESOURCE SPECIALIST
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MR ERNEST PINGLETON TRIBAL HISTORIC OFFICER
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USPS CERTIFIED MAIL

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MR JOHN CHRISTMAN CHAIRPERSON
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1 VIEJAS GRADE RD
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Appendix C

Qualified Personnel (Resumes)

CURRICULUM VITAE

Keshia M. Montifolca
Dudek
605 Third Street
Encinitas, CA 92024
Phone: (619) 949-3082
E-mail:
kmontifolca@dudek.com

Education

2013 MA, Anthropology, San Diego State University

2008 BA, Sociology, University of California, Santa Cruz

Registrations - Register of Professional Archaeologists (2015)

Professional Research Interests and Experience

Applied anthropology and archaeology (prehistoric and historic)

San Diego County Archaeology Experience

Affiliation	Client	Project Description	Dates	Weeks / days
Dudek	Sillman	EMTS NTC Laboratory Remodel and NTC Lab Solar Implementation Project, City of San Diego. Conducted survey and authored technical report.	2023	1 week
Dudek	City of Encinitas	Zona Gale Estates Project, Encinitas. Coordinated pedestrian survey, field director for testing and evaluation of known resource, authored technical report.	2023	2 weeks
Dudek	Country Club Ventures	Archaeological Survey and Evaluation for the Solaris Business Park Project, Escondido, California. Coordinated survey and authored technical report.	2023	1 week
Dudek	Capalina SMA LLC	Capalina Apartments Project, San Marcos. Conducted records search, coordinated pedestrian survey, authored technical report.	2023	1 week
Dudek	Boretto+ Merrill Consulting	Sunshine Gardens Project, Encinitas, California. Archaeological project manager, schedule archaeological and Native American monitoring and authored technical report.	2022-2023	2 weeks
Dudek	Black Fox Timber Management Group, Inc.	Archaeological Survey and Evaluation for the Girl Scout Camp Project, San Diego County, California. Co-coordinated survey, co-coordinated testing and evaluation, and authored technical report.	2022-2023	3 weeks

Dudek	TTLC Vista East Vista LLC	East Vista Housing Project, Vista. Coordinated pedestrian survey, coordinated testing, conducted evaluation of known resource, authored technical report.	2022	2 weeks
Dudek	City Ventures	El Cajon I Project, El Cajon. Archaeological project manager, schedule archaeological and Native American monitoring, authored technical report.	2022	5 weeks
Dudek	Schmidt Design Group	Emerald Hills Park Project, City of San Diego. Conducted records search, conducted pedestrian survey, authored technical report.	2022	2 weeks
Dudek	City of San Diego	La Jolla Farms Outfall Repair Project, City of San Diego. Conducted records search, coordinated pedestrian survey, conducted evaluation of known resources, authored addendum report.	2022	1 week
Dudek	MCRT Investments LLC	Modera Melrose Project, Oceanside. Conducted records search, coordinated pedestrian survey, conducted evaluation of known resource, authored technical report.	2022	2 weeks
Dudek	The Palomar Heights Project Owner LLC	The Palomar Heights Project, Escondido. Archaeological project manager, schedule archaeological and Native American monitoring, authored technical report.	2021-2022	20 weeks
Dudek	Legacy Partners	Archaeological Survey and Evaluation for the Sunset Drive Project, Oceanside, California. Coordinated survey and authored technical report.	2022	1 week
Dudek	HomeFed Village III, LLC	Otay Ranch Village 3 R6/R20 Compliance Project, Chula Vista, California. As project archaeologist, coordinated archaeological and Native American monitoring, on-site evaluations, authored technical report.	2022	5 weeks
Dudek	Rincon Homes	Archaeological Survey and Evaluation for the Guajome Crest Project, Oceanside, California. Conducted survey and authored technical report.	2022	1 week
Dudek	TTLC Vista Foothill, LLC	Archaeological Survey and Evaluation for the Vista Foothill Residential Project, Vista, California. Coordinated survey and authored technical report.	2022	1 week
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Live Oak Park Road Bridge Project, Fallbrook, California. As project archaeologist, coordinated archaeological and Native American monitoring during utility relocation phase.	2021	4 weeks
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Mount Helix Drive Rock Walls, Casa de Oro, California. As project archaeologist, conducted records search, field investigation, and outreach on researching the history of the rock walls.	2021	4 weeks
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Estrella Park Water Quality Improvement Project, Casa de Oro, California. As project archaeologist, coordinated archaeological and Native American monitoring.	2021	1 week

County of San Diego Department of Public Works	County of San Diego Department of Public Works	Willows Road Bridge Scour Project, San Diego County, California. As project archaeologist, coordinate archaeological and Native American monitoring during construction	2020	28 weeks
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Old Highway 80 Sealing and Repairs FY 20-21, San Diego County, California. As project archaeologist, review construction samples and specs to ensure compliance with preservation.	2021	1 week
County of San Diego Department of Public Works	County of San Diego Department of Public Works	San Diego River Basin Sewer Improvements Project, Lakeside, California. As project archaeologist, prepared NAHC outreach, and coordinated consultants for field review.	2021	4 weeks
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Woodside Avenue Sidewalk Improvement Project, Lakeside, California. Conducted pedestrian survey and authored technical report.	2021	1 week
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Cultural Resources Inventory Memorandum for the RGP-53 Permit 2021 Renewal, San Diego County California. Conducted sites records search and authored memorandum.	2021	1 week
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Cultural Resources Inventory Memorandum for the Gillespie Service Road and Drainage Project, El Cajon, California. Conducted sites records search and authored memorandum.	2021	1 week
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Cultural Resources Inventory Memorandum for the Ramona West Apron Project, Ramona, California. Conducted sites records search and authored memorandum.	2021	1 week
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Rainbow Water Quality Improvement Project, Rainbow, California. As project archaeologist, conducted NAHC and AB52 outreach and consultations.	2021	8 weeks
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Sweetwater Road Pathway Improvement Project, San Diego County, California. As project archaeologist, conducted survey and authored technical report.	2020	1 week
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Sycamore Drive Bridge Project, San Marcos, California. As project archaeologist, conducted NAHC and AB52 outreach and consultations.	2020	8 weeks

County of San Diego Department of Public Works	County of San Diego Department of Public Works	Mapleview Street Green Streets Project, Lakeside, California. As project archaeologist, conducted NAHC and AB52 outreach and consultations.	2020	8 weeks
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Boys and Girls Club of North County Improved Accessibility Project, Fallbrook, CA. Conducted survey and evaluation of historic building, authored SHPO letter, and consulted with SHPO.	2020	2 weeks
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Coronado John D. Spreckels Center Emergency Power Project, Coronado, CA. Conducted survey and evaluation of historic building, authored SHPO letter, and consulted with the SHPO.	2020	3 weeks
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Ramona Food and Clothes Closet Solar Panel Installation Project, Fallbrook, California. Conducted survey and evaluation of historic building, authored SHPO letter, and consulted	2020	3 weeks
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the El Cajon Senior Veterans Apartments Multifamily Housing Acquisition and Rehabilitation Project, El Cajon, California. Conducted survey and evaluation of historic building, authored SHPO	2020	2 weeks
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the HOPWA-Fraternity House Roof Repair and/or Replacement Project, San Diego, California. Conducted survey and evaluation of potential historic property and authored documentation.	2020	2 days
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Veterans Village of San Diego Escondido Apartments Project, Escondido, California. Conducted survey and evaluation of potential historic property and authored documentation.	2020	2 weeks
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the West Aviation Road Sidewalk Improvements Project, Fallbrook California. Conducted survey and evaluation of potential historic property and authored documentation.	2020	2 days
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the City of Imperial Beach ADA Pedestrian Ramps Project, Imperial Beach, California. Conducted survey and evaluation of potential historic property and authored documentation.	2020	2 days
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Villa Lakeshore Apartments Rehabilitation Project, Lakeside, California. Conducted survey and evaluation of potential historic property and authored documentation.	2020	2 weeks

County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the City of Lemon Grove Street Rehabilitation and ADA Pedestrian Ramps Project, Lemon Grove, California. Conducted survey and evaluation of potential historic property and authored	2020	2 days
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Alora Affordable Housing for Families Phase I, San Marcos, California. Conducted survey and evaluation of potential historic property and authored documentation.	2020	2 weeks
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the City of Solana Beach ADA Pedestrian Ramps Project, Solana Beach, California. Conducted survey and evaluation of potential historic property and authored documentation.	2020	2 days
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Skyline Fire Recovery Emergency Project, San Diego County California. Conducted survey and provided avoidance measures for existing cultural sites.	2020	1 week
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Ramona Town Hall ADA Improvements Project, Fallbrook, California. Conducted survey and evaluation of historic building, authored SHPO letter, and consulted with the SHPO.	2019	2 weeks
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Old Highway 80 Sealing and Repairs FY 18-19, San Diego County, California. As project archaeologist, review construction samples and specs to ensure compliance with preservation.	2019	1 week
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Town Center Manor Improvements Project, Chula Vista, California. Conducted survey and evaluation of potential historic property and authored documentation.	2019	2 weeks
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Dehesa Road and Harbison Canyon Road Intersection Improvement Project, San Diego County, California. As project archaeologist, coordinated archaeological and Native American monitoring during utility relocation phase.	2019	28 weeks
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Riverside Drive Flood Control Channel Water Quality Improvement Project, Lakeside, California. As project archaeologist, coordinated archaeological and Native American monitoring during construction.	2019	1 week
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Coast Boulevard at 22nd Street ADA Pedestrian/Roadway Improvements Project, Del Mar, California. Conducted survey and authored documentation.	2019	2 days

County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Don Dussault Park Improvements Phase III Project, Fallbrook, California. Conducted survey and evaluation of potential historic property and authored documentation.	2019	2 days
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the West Alvarado Street Sidewalks Project, Fallbrook, California. Conducted survey and evaluation of potential historic property and authored documentation.	2019	2 days
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the West Aviation Road Sidewalks Project, Fallbrook, California. Conducted survey and evaluation of potential historic property and authored documentation.	2019	2 days
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Lakeshore Drive at Channel Road Sidewalk Project, Lakeside, California. Conducted survey and evaluation of potential historic property and authored documentation.	2019	2 days
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Family Affordable Solar Homes Project: 13810 Terrilee Drive, Poway, California. Conducted surveys and evaluations of four potential historic properties and authored documentation.	2019	1 week
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Family Affordable Solar Homes Project: 15097 Lone Oak Trail, Ramona, California. Conducted surveys and evaluations of four potential historic properties and authored documentation.	2019	1 week
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Family Affordable Solar Homes Project: 2188 Eldora Street, Lemon Grove, California. Conducted surveys and evaluations of four potential historic properties and authored documentation.	2019	1 week
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Family Affordable Solar Homes Project: 919 La Presa Ave, Spring Valley, California. Conducted surveys and evaluations of four potential historic properties and authored documentation.	2019	1 week
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Wilma Street and Granger Avenue Sidewalk Project, National City, California. Conducted survey and evaluation of potential historic property and authored documentation.	2019	2 days
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Lake Poway ADA Barrier Removal Project, Poway, California. Conducted survey and evaluation of potential historic property and authored documentation.	2019	2 days

County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the D Street Sidewalk Project, Ramona, California. Conducted survey and evaluation of potential historic property and authored documentation.	2019	2 days
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Birch Street Sidewalk at Sweetwater Lane Project, La Presa, California. Conducted survey and evaluation of potential historic property and authored documentation.	2019	2 days
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Lamar Park Project, Spring Valley, California. Conducted survey and evaluation of potential historic property and authored documentation.	2019	2 days
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Goldentop Road Water Quality Improvement Project, 4S Ranch, California. As project archaeologist and environmental planner, conducted field survey, and records search.	2019	1 week
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the San Marino Drive Water Quality Improvement Project, San Marcos, California. As project archaeologist and environmental planner, conducted field survey, and records search.	2019	1 week
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Cultural Resources Inventory Memorandum for Ramona Sheriff Substation Project, Ramona, California. Conducted sites records search and authored memorandum.	2019	1 week
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Oleander Avenue Sidewalks Project, Chula Vista, California. Conducted survey and evaluation of potential historic property and authored documentation.	2019	2 days
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the San Miguel Drive Sidewalks Project, Chula Vista, California. Conducted survey and evaluation of potential historic property and authored documentation.	2019	2 days
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Bonita Drive Sidewalks Project, San Diego, California. Conducted survey and evaluation of potential historic property and authored documentation.	2019	2 days
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Cultural Resources Inventory Memorandum for Sheriff Quartermaster Project, Otay Mesa, California. Conducted sites records search and authored memorandum.	2019	1 week

County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Keys Creek Channel Access and Maintenance Project, Fallbrook, California. Conducted survey and authored technical report.	2018	1 week
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Old Highway 80 Sealing and Repairs FY 17-18, San Diego County, California. As project archaeologist, reviewed construction specs construction samples to ensure color matching.	2018	1 week
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological monitoring for the geotechnical work for the Dehesa Road & Harbison Canyon Road Intersection Improvement Project, San Diego County, California. As project archaeologist, conducted archaeological monitoring for geotech.	2018	2 days
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Riverside Drive Flood Control Channel Water Quality Improvement Project, Lakeside, California. Conducted survey, NAHC and AB52 consultations and authored technical report.	2018	8 weeks
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Old Highway 80 Sealing and Repairs, San Diego County, California. As project archaeologist, review construction samples to ensure color matching.	2018	1 week
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Coronado ADA Curb Improvements: B, C, and G Avenue Corridors Project, Coronado, California. Conducted survey and evaluation of potential historic property and authored documentation.	2018	2 days
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Rios Canyon Road Pedestrian Improvements Project, El Cajon, California. Conducted survey and evaluation of potential historic property and authored documentation.	2018	2 days
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Aviation Road Missing Sidewalk Project, Fallbrook, California. Conducted survey and evaluation of potential historic property and authored documentation.	2018	2 days
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Don Dussault Park Improvements- Phase I, Fallbrook, California. Conducted survey and evaluation of potential historic property and authored documentation.	2018	2 days
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Rose Temple Memorial Park Improvements Project, Imperial Beach, California. Conducted survey and evaluation of potential historic property and authored documentation.	2018	2 days

County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Lemon Grove Street Rehabilitation and ADA Pedestrian Curb Ramps Project, Lemon Grove, California. Conducted survey and evaluation of and authored documentation.	2018	2 days
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Boys & Girls Club: Rehabilitation and Upgrade of Conrad-Prebys Ramona Branch Project. Conducted survey and evaluation of potential historic property and authored documentation.	2018	1 week
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Lemon Crest Drive Drainage Project, Lakeside, California. Conducted survey and authored technical report.	2017	1 week
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Supplemental Archaeological Survey and Evaluation for the Live Oak Park Road Bridge Project, Fallbrook, California. Conducted survey and authored technical report. Conducted AB-52 consultations.	2017	4 weeks
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Monitoring for the Fallbrook Street Sidewalk Improvements Project San Diego County, California. As Project archaeologist, conducted cultural monitoring ground disturbing activities.	2017	2 weeks
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological survey and monitoring for the Lilac Fire Recovery Emergency Project, San Diego County, California. As Project archaeologist, conducted site records search, and monitoring of ground disturbing activities.	2017	1 week
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the HUD-Funded Villa de Vida Multifamily Housing Development, Poway, California. Conducted survey and authored SHPO letter.	2017	2 weeks
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the HUD-Funded Ramona Senior Apartments, Ramona, California. Conducted survey and authored SHPO letter.	2017	2 weeks
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the HUD-Funded The Grove Affordable Senior Housing, Vista, California. Conducted survey and authored SHPO letter.	2017	2 weeks
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Dehesa Road and Harbison Canyon Road Intersection Improvement Project, Crest, California. Conducted survey and authored technical report.	2017	2 weeks

County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Mountain Health and Community Services Health Center-Security Fence Project. Conducted survey and evaluation of potential historic property and authored documentation.	2017	2 days
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Vista Las Flores Apartment Housing Development Rehabilitation Project. Conducted survey and evaluation of potential historic property and authored documentation.	2017	1 week
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Coronado ADA Improvements- ADA Door & ADA Curb Upgrades Project. Conducted survey and evaluation of potential historic property and authored documentation.	2017	2 days
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Ammunition Rd. (S. Mission/Alturas) Sidewalks, Fallbrook, California. Conducted survey and evlauation and authored documentation.	2017	2 days
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Clemmens Lane Park Improvements, Fallbrook, California. Conducted survey and evaluation of potential historic property and authored documentation.	2017	2 days
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Ramona D Street Sidewalks, Ramona, California. Conducted survey and evaluation of potential historic property and authored documentation.	2017	2 days
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Shelter Valley Community Center-Ground Mounted Solar Generation System, San Diego County, California. Conducted survey and evaluation and authored documentation.	2017	2 days
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Valley Center Park ADA Improvements, Valley Center, California. Conducted survey and evaluation and authored documentation.	2017	2 days
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Old Highway 80 Sealing and Repairs FY 16-17, San Diego County, California. As project archaeologist, reviewed construction specs and construction samples to ensure color matching.	2017	1 week
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Valley Road Sidewalks Project. Conducted survey and evaluation of potential historic property and authored documentation.	2017	2 days

County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Fuerte Drive Realignment Project, San Diego, California. Conducted survey and authored technical report.	2016	2 weeks
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Mapleview Street Sidewalks Project. Conducted survey and evaluation of potential historic property and authored documentation.	2016	2 weeks
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the El Apajo Sidewalks Project. Conducted survey and evaluation of potential historic property and authored documentation.	2016	2 weeks
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological monitoring for the Alpine Boulevard Streetscape Improvements Project. As Project archaeologist, conducted cultural monitoring ground disturbing activities.	2016	2 weeks
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Cultural Resources Inventory Memorandum for the Gillespie Field Airport Project, Ramona, California. Conducted sites records search and authored memorandum.	2016	1 week
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Cultural Resources Inventory Memorandum for the SDG&E Steel Canyon Road Project, Jamul, California. Conducted sites records search and authored memorandum.	2016	1 week
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Keys Creek Channel Access and Maintenance Project, Fallbrook, California. As project archaeologist, coordinate archaeological and Native American monitoring during construction and maintenance phases.	2016	5 weeks
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Monitoring for the Bear Valley Parkway North Widening Project, San Diego County, California. As Project archaeologist, conducted cultural monitoring ground disturbing activities.	2016	4 weeks
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Monitoring for the Supervisory Control and Data Acquisitions Improvements for Water and Wastewater Facilities Project. As Project archaeologist, conducted cultural monitoring ground disturbing activities.	2016	4 weeks
County of San Diego Department of Public Works	County of San Diego Department of Public Works	Archaeological Survey and Evaluation for the Rancho Santa Fe Roundabouts Project, Rancho Santa Fe, California. As Project archaeologist conducted updated survey and authored addendum report.	2016	2 weeks

County of San Diego Department of Public Works	County of San Diego Department of Public Works	Old Highway 80 Sealing and Repairs FY 16-18, San Diego County, California. As project archaeologist, reviewed construction specs and construction samples to ensure color matching.	2016	1 week
ASM	San Diego Gas and Electric	Wood to Steel Preconstruction Archaeological Surveys for the Tie Line Alternative Pole Replacements, San Diego, California. As Archaeological Field Technician conducted preconstruction surveys for future power poles.	2014	2 weeks
ASM	Alpha Project	Archaeological Monitoring for the Alpha Project, San Diego, San Diego County, California. As Archaeological Field Technician conducted cultural monitoring for all ground disturbance.	2014	13 weeks
ASM	North County Health Services	Archaeological Monitoring for the Mission Mesa Medical Center Project, North County, San Diego County, California. As Archaeological Field Technician conducted cultural monitoring for all ground disturbance.	2014	2 weeks
ASM	Harborview Hotel	Archaeological Monitoring for the Harborview Hotel, San Diego, San Diego County, California. As Archaeological Field Technician conducted cultural monitoring for all ground disturbance.	2014	2 weeks
Petra	San Diego Gas and Electric	Archaeological Monitoring for the City of Chula Vista Underground Utility Project, Chula Vista, San Diego County, California. As Archaeological Field Technician conducted cultural monitoring for underground utilities trenching.	2014	2 weeks
ASM	San Diego Gas and Electric	Archaeological Monitoring for the San Diego Gas and Electric Gas Line Trenching Project, La Jolla, San Diego County, California. As Archaeological Field Technician conducted cultural monitoring for underground utilities trenching.	2014	1 week
Petra	San Diego Gas and Electric	Wood to Steel Archaeological Monitoring for the Tie Line Alternative Pole Replacements, Cleveland National Forest, San Diego County, California. As Archaeological Field Technician conducted monitoring for pole replacements.	2014	2 weeks
Petra	San Diego Gas and Electric	Archaeological Monitoring for the San Diego Gas and Electric Gas Line Project, San Diego, California. As Archaeological Field Technician conducted cultural monitoring for potholing of utilities at Hotel Circle.	2014	2 weeks
ASM	San Diego Gas and Electric	Archaeological Monitoring for the San Diego Gas and Electric Pole Brushing Project, San Diego County, California. As Archaeological Field Technician conducted cultural monitoring for pole brushing activities.	2014	8 weeks

ASM	City of Encinitas	Archaeological Monitoring for Moonlight State Beach Project, Encinitas, San Diego County, California. As Archaeological Field Technician conducted cultural monitoring for all ground disturbance.	2013	1 week
ASM	McMillin Construction	Archaeological Monitoring for the Pulse Millenia Apartments, Chula Vista, San Diego County, California. As Archaeological Field Technician conducted cultural monitoring for all ground disturbance.	2013	13 weeks
ASM	SANDAG	Archaeological Data Recovery for the SANDAG Railroad Project, San Diego County, California. As Archaeological Field Technician, excavated units, and identified prehistoric and historical material for project.	2012	2 weeks
ASM	Camp Pendleton	Archaeological Survey for the Marine Corps Base Camp Pendleton, San Diego County. As Archaeological Field Technician conducted pedestrian survey to identify any cultural resources located on Camp Pendleton.	2011	1 day
CAL FIRE	CAL FIRE	Archaeological Survey for CAL FIRE Southern Region Resource Management, San Diego County. As Archaeological Intern. Conducted pedestrian survey to identify any cultural resources located within San Diego County.	2011	15 days

Other Southern California Archaeology Experience

Affiliation	Client	Project Description	Dates	Weeks / days
ASM	San Diego Gas and Electric	Wood to Steel Preconstruction Archaeological Surveys for the Tie Line Alternative Pole Replacements, Laguna Beach, California. As Archaeological Field Technician conducted preconstruction survey for future power pole replacements.	2014	1 week
AES	CalTrans	Archaeological Survey for the I-10 Highway Overpass Project, Caltrans, Banning, California. As Archaeological Field Technician, conducted intensive pedestrian survey for proposed project area. Identified all potential impacts to existing and newly recorded cultural resources.	2014	1 week

Matthew DeCarlo, MA, RPA

ARCHAEOLOGIST

Matthew DeCarlo is an archaeologist with 17 years' professional experience leading archaeological surveys and excavations, performing lithic and faunal analyses, constructing and analyzing geographic information system (GIS) data, and producing cultural resource management reports. As acting district archaeologist for the U.S. Forest Service (USFS), Mr. DeCarlo worked intensively with federal regulations and Native American tribal representatives. From this experience, he has developed the ability to work collaboratively with consulting groups on multiphase projects. Within the private sector, Mr. DeCarlo has managed the cultural resource requirements for large-scale utility projects, which required extensive cooperation with utility managers, construction efforts, and Native American tribal representatives.

Education

California State University, Bakersfield
M.A., Anthropology, 2018

University of California, Irvine
B.A., Anthropology, 2006

Certifications

Registered Professional Archaeologist (RPA)

Professional Affiliations

San Diego Archaeological Society

Society for American Archaeology

Society for California Archaeology

Project Experience

Confidential Energy Project, Esmeralda County, Nevada. Served as cultural resources project lead for a Class III cultural resources inventory on Bureau of Land Management administered land in support of a proposed energy project in Esmeralda County, Nevada. Responsibilities included proposing cultural resources budget, analysis of archived records and aerial photographs. Acted as field lead during archaeological and paleontological pedestrian survey. Confirmed status of known cultural resources and recorded previously unidentified cultural resources within project area. Analyzed possible impacts to cultural resources within the project area and completed a report summarizing the finding of the cultural resources inventory including resource management recommendations.

Juniper Energy Project, San Bernardino County, California. Served as cultural resources project lead for a cultural resources inventory in support of a proposed solar energy project in San Bernardino County, California. Responsibilities included proposing cultural resources budget, analysis of archived records, aerial photographs, and Native American consultation. Acted as field lead during archaeological pedestrian survey. Confirmed status of known cultural resources and recorded previously unidentified cultural resources within project area. Analyzed possible impacts to cultural resources within the project area and completed a report summarizing the finding of the cultural resources inventory including resource management recommendations.

Confidential Energy Project, Clark County, Nevada. Participated in a Class III cultural resources inventory in support of a confidential energy project on Bureau of Land Management administered land in Clark County, Nevada. Responsibilities included analysis of archived records and aerial images. Participated in archaeological pedestrian survey.

San Diego State University Fenton Parkway Bridge Project, City of San Diego, California. Served as cultural resources project lead for the proposed SDSU Fenton Parkway Bridge Project. Responsibilities included analysis of archived records, aerial photographs, and Native American outreach. Conducted a pedestrian survey of the project area. Produced both CEQA and Section 106 compliant reports summarizing the finding of the cultural resources inventory including a cultural resources impact analysis, projected resource sensitivities, resource management recommendations, and mitigation measures.

City of San Diego Underground Utility Program EIR, City of San Diego, San Diego County, California. Served as cultural resources lead for an inventory and evaluation report supporting the Underground Utilities Program in the City of San Diego. Responsibilities included analysis of archived records, aerial photographs, and Native American outreach. Categorized the sensitivity of over 800 proposed districts based on cultural sensitivity and developed mitigation measures to reduce impacts to resources to a less than significant level.

City of San Diego Underground Utility Program, Various Projects, City of San Diego, San Diego County, California. Served as manager for the cultural resource monitoring of a citywide utility underground program in the City of San Diego. Responsibilities included consultation with program representatives, scheduling and management of field technicians, oversite of daily field logs, recordation of identified cultural resources, and constructing a summary document at the completion of each project phase.

UCSD Theater District Living and Learning Neighborhood Project, La Jolla, San Diego County, California. Managed the cultural resource monitoring program for a university neighborhood construction project. Responsibilities included proposing cultural resources budget, developing a Workers Environmental Awareness Program and delivering it to project personnel, and subcontracting Native American monitors. Oversaw archaeological and Native American monitoring teams to assure compliance with project mitigation measures as dictated in a UCSD approved cultural resources mitigation monitoring and reporting program. Evaluated unanticipated cultural resources and recommended mitigation in consultation with UCSD and Native American representatives. Reviewed monitoring team's daily logs and completed a monitoring report summarizing monitoring activities.

Mountain View Wind Repower Project, Riverside County, California. Served as cultural resources project lead for the cultural resources inventory and evaluation in support of a proposed wind repowering project in Riverside County, California. Responsibilities included proposing cultural resources budget, analysis of archived records, aerial photographs, and Native American outreach. Acted as field lead during archaeological and paleontological pedestrian survey. Confirmed status of known cultural resources and recorded previously unidentified cultural resources within project area. Analyzed possible impacts to cultural resources within the project area and completed a report summarizing the finding of the cultural resources inventory including resource management recommendations.

Coachella Flats Wind Project, City of Palm Springs, Riverside County, California. Managed the cultural resource monitoring program for the wind energy repowering project. Responsibilities included proposing cultural resources budget, developing a Workers Environmental Awareness Program and delivering it to project personnel, and subcontracting Native American monitors. Oversaw archaeological and Native American monitoring teams to assure compliance with project mitigation measures and avoidance of known cultural resources. Evaluated unanticipated cultural resources and recommended mitigation in consultation with the City of Palm Springs and Native American representatives. Reviewed monitoring team's daily logs and completed a monitoring report summarizing monitoring activities and unanticipated finds.

Desert Hot Springs Wind Energy Repowering Project, City of Desert Hot Springs, Riverside County, California. Managed the cultural resource monitoring program for the wind energy repowering project. Responsibilities

included proposing cultural resources budget, developing a Workers Environmental Awareness Program and delivering it to project personnel, and subcontracting Native American monitors. Oversaw archaeological and Native American monitoring teams to assure compliance with project mitigation measures and avoidance of known cultural resources. Evaluated unanticipated cultural resources and recommended mitigation in consultation with the City of Desert Hot Springs and Native American representatives. Reviewed monitoring team's daily logs and completed a monitoring report summarizing monitoring activities and unanticipated finds.

Painted Hills Wind Energy Repowering Project, Riverside County, California. Managed the cultural resource monitoring program for the wind energy repowering project. Responsibilities included proposing cultural resources budget, developing a Cultural Resources Monitoring Plan, developing a Workers Environmental Awareness Program and delivering it to project personnel, and subcontracting Native American monitors. Oversaw archaeological and Native American monitoring teams to assure compliance with project mitigation measures and avoidance of known cultural resources. Evaluated unanticipated cultural resources and recommended mitigation in consultation with the County Archaeologist and Native American representatives. Reviewed monitoring team's daily logs and completed a Phase IV Monitoring Report summarizing monitoring activities and unanticipated finds.

San Jacinto II Wind Energy Repowering Project, Riverside County, California. Managed the cultural resource monitoring program for the wind energy repowering project. Responsibilities included proposing cultural resources budget, developing an Archaeological Monitoring, Post-Review Discovery, and Unanticipated Effects Plan, developing a Workers Environmental Awareness Program and delivering it to project personnel, and subcontracting Native American monitors. Oversaw archaeological and Native American monitoring teams to assured compliance with project mitigation measures and avoidance of known cultural resources. Evaluated unanticipated cultural resources and recommended mitigation in consultation with the Bureau of Land Management and Native American representatives. Reviewed monitoring team's daily logs and completed a Cultural Resources Monitoring and Discovery Report summarizing monitoring activities and unanticipated finds.

Municipal Waterways Maintenance Plan, City of San Diego, San Diego County, California. Served as cultural resources project lead for the proposed Municipal Waterways Maintenance Plan for the City of San Diego. Responsibilities included analysis of archived records, aerial photographs, and Native American outreach. Conducted site visits of project facilities while coordinating with Native American representatives. Produced a report summarizing the finding of the cultural resources inventory including a cultural resources impact analysis, projected resource sensitivities, resource management recommendations, and mitigation measures. Developed a matrix indicating maintenance activities and facility locations that are exempt from further cultural review. Analyzed consistency of individual project with the MWMP EIR and developed a Cultural Resources Monitoring and Treatment Plans to manage impacts to cultural resources.

Sage Meadow Residential Development Project, City of Valley Center, San Diego County, California. Managed the cultural resource monitoring of the construction of a residential building near the Community of Valley Center, California. Responsibilities included proposing cultural resources budget, administration of contract, scheduling and management of field technicians, consultation with and subcontracting of Native American representatives, oversite of daily field logs, recordation of identified cultural resources, and submitting a summary document at the completion of the project.

Sanders Site Vernal Pool Mitigation Project in Support of the Pure Water San Diego Program, North City Project, City of San Diego, San Diego County, California. Managed the cultural resource inventory and monitoring program for the vernal pool mitigation project in support of a City-wide recycled water purification program in City of San Diego, California. Responsibilities included proposing cultural resources budget, analysis of archived records, aerial photographs, and Native American outreach. Subcontracted Native American monitors and conducted a

pedestrian survey of the project area and produced a report summarizing the finding of the cultural resources inventory including resource management recommendations. Managed the cultural resource monitoring phase of the project including scheduling and management of field technicians, consultation with and subcontracting of Native American representatives, oversite of daily field logs, recordation of identified cultural resources, and submitting a summary document at the completion of the project.

San Diego State University Mission Valley Campus Master Plan Project, City of San Diego, California. Served as cultural resources project lead for the proposed SDSU Mission Valley Campus Master Plan. Responsibilities included analysis of archived records, aerial photographs, and Native American outreach. Native American outreach included presenting at Native American project scoping meetings, AB-52 notifications, and attending AB-52 consultation meetings to aid SDSU negotiate tribal mitigation measures. Conducted a pedestrian survey of the project area. Produced both CEQA and Section 106 compliant reports summarizing the finding of the cultural resources inventory including a cultural resources impact analysis, projected resource sensitivities, resource management recommendations, and mitigation measures.

Ida Avenue Residential Development Project, City of Del Mar, San Diego County, California. Served as cultural resources project lead for a proposed residential development in Del Mar, California. Responsibilities included proposing cultural resources budget, analysis of archived records, aerial photographs, and Native American outreach. Subcontracted Native American monitors and conducted a pedestrian survey of the project area. Analyzed possible impacts to adjacent cultural resources and produced a report summarizing the finding of the cultural resources inventory including resource management recommendations.

The Trails at Carmel Mountain Ranch Project, Carmel Mountain Ranch Community, City of San Diego, San Diego County, California. Served as cultural resources project lead for a proposed residential development in San Diego, California. Responsibilities included proposing cultural resources budget, analysis of archived records, aerial photographs, and Native American outreach. Subcontracted Native American monitors and supervised the reconnaissance survey of the project area. Analyzed possible impacts to cultural resources within the project area and produced a report summarizing the finding of the cultural resources inventory including resource management recommendations.

2020 SeaWorld Master Plan Update, City of San Diego, San Diego County, California. Served as archaeological resources project lead for the proposed update of the SeaWorld Master Plan in San Diego, California. Responsibilities included analysis of archived records, aerial photographs, and Native American outreach. Analyzed archival information compared to the topography of the property to determine the Master Plan's potential to impact cultural resources. Produced a report summarizing the finding of the cultural resource sensitivity and the projects potential to impact resources.

Montgomery Middle School Field Lighting Project, City of El Cajon, San Diego County, California. Served as cultural resources project lead for a proposed installation of athletic field lighting in the El Cajon, California. Responsibilities included proposing cultural resources budget, analysis of archived records, aerial photographs, and Native American outreach. Analyzed possible impacts to cultural resources and produced a report summarizing the finding of the cultural resources analysis including resource management recommendations.

Federal Update for the North Indio Flood Control Channel Project, City of Indio, Riverside County, California. Served as archaeological resources project lead for the updating of state environmental documents for federal regulation compliance for a flood control project in Indio, California. Responsibilities included analysis of previously conducted document, identification of shortfalls with federal regulations, proposed additional archaeological testing for federal compliance, and coordination with project proponents. Conducted

archaeological testing and completed a resource significance report for submission to and concurrence from the State Historic Preservation Office.

All-American Canal Surface Waters Seepage Recovery Project, City of El Centro, Imperial County, California. Served as cultural resources project lead for a proposed water recovery project outside the City of El Centro. Responsibilities included analysis of archived records, aerial photographs, and Native American outreach. Also conducted a pedestrian survey of the project area. Produced a report summarizing the finding of the cultural resources inventory including a cultural resources impact analysis comparing alternate project routes, resource management recommendations, and mitigation measures.

East Highline Reservoir Project, City of El Centro, Imperial County, California. Served as cultural resources project lead for a proposed main canal offline storage reservoir project outside the City of El Centro. Responsibilities included analysis of archived records, aerial photographs, and Native American outreach. Also conducted a pedestrian survey of the project area. Produced a report summarizing the finding of the cultural resources inventory including an impact analysis of a National Register of Historic Places listed resource, resource management recommendations, and mitigation measures.

Oceanside Campus Facilities Master Plan Project, City of Oceanside, San Diego County, California. Served as archaeological resources project lead for a proposed renovation and redevelopment of the Oceanside Campus within the MiraCosta Community College District. Responsibilities included analysis of archived records, aerial photographs, and Native American outreach. Conducted a pedestrian survey of the project area and coordination with a Native American monitor. Aided the District with AB 52 consultation including hosting project site visits with Native American representatives. Produced a report summarizing the finding of the cultural resources inventory and resource management recommendations including mitigation measures.

North City Project, City of San Diego, San Diego County, California. Served as cultural resources project lead for the proposed construction of a water purification program in the City of San Diego. Responsibilities included analysis of archived records, aerial photographs, and Native American outreach. Aided the City with AB-52 tribal consultation and conducted a pedestrian survey of the project area while coordinating with a Native American monitors. Produced a report summarizing the finding of the cultural resources inventory including a cultural resources impact analysis comparing alternate project routes, resource management recommendations, and mitigation measures.

Morena Pipelines Project, City of San Diego, San Diego County, California. Served as cultural resources project lead for a proposed utility pipeline installation project in the City of San Diego. Responsibilities included analysis of archived records, aerial photographs, and Native American outreach. Also conducted a pedestrian survey of the project area in coordination with a Native American monitor. Produced a report summarizing the finding of the cultural resources inventory and resource management recommendations including mitigation measures.

1237 West 7th Street Project, City of Los Angeles, Los Angeles County, California. Served as lead analyst and report author for a tribal cultural resources assessment for a proposed urban development project in the City of Los Angeles. Responsibilities included analysis of archived records, aerial photographs, and Native American outreach. Produced a report indicating the presence and the probability of encountering subsurface tribal cultural resources during construction.

1375 North Saint Andrews Place Project, City of Los Angeles, Los Angeles County, California. Served as lead analyst and report author for a tribal cultural resources assessment for a proposed urban development project in the City of Los Angeles. Responsibilities included analysis of archived records, aerial photographs, and Native

American outreach. Produced a report indicating the presence and the probability of encountering subsurface tribal cultural resources during construction.

Fig Project, City of Los Angeles, Los Angeles County, California. Served as lead analyst and report author for a tribal cultural resources assessment for a proposed urban development project in the City of Los Angeles. Responsibilities included analysis of archived records, aerial photographs, and Native American outreach. Produced a report indicating the presence and the probability of encountering subsurface tribal cultural resources during construction.

Adams Solar Farm Project, City of Lind, Adams County, Washington. Developed an inadvertent discovery plan for utilization during the development of a solar farm.

San Diego State University New Student Housing Project, City of San Diego, California. Served as cultural resources project lead for the proposed SDSU New Student Housing Project. Responsibilities included analysis of archived records, aerial photographs, and Native American outreach. Native American outreach included a search of the Sacred Lands File at the Native American Heritage Committee, distribution and tracking of AB-52 notifications, and participating in AB-52 consultation meetings. Conducted a pedestrian survey of the project area and produced a report summarizing the finding of the cultural resources inventory including a cultural resources impact analysis, projected resource sensitivities, resource management recommendations, and mitigation measures.

Kaiser Permanente Irwindale Medical Office Building Project, City of Irwindale, Los Angeles County, California. Managed the cultural resource monitoring of the construction of a Kaiser Permanente medical building in the City of Irwindale. Responsibilities included consultation with program representatives, scheduling and management of field technicians, consultation with Native American representatives, oversite of daily field logs, recordation of identified cultural resources, and submitting a summary document at the completion of the project.

Fairway Business Park Project, Lake Elsinore, Riverside County, California. Managed the cultural resource monitoring of the construction of a business park in the City of Lake Elsinore. Responsibilities included consultation with program representatives, scheduling and management of field technicians, consultation with Native American representatives, oversite of daily field logs, recordation of identified cultural resources, and constructing a summary document at the completion of the project.

21st Street Ditch Project, City of Del Mar, San Diego County, California. Aided the City of Del Mar with AB-52 compliance for a proposed wastewater improvement project in the City of Del Mar. Drafted Responsibilities included drafting an AB-52 letter on the City's behalf requesting Native American representatives consultation.

MedVic/MccVic Tower Repair Project, near the City of Yermo, San Bernardino County, California. Served as cultural resources project lead for a proposed electrical transmission tower repair project outside the City of Yermo. Responsibilities included analysis of archived records, aerial photographs, and Native American outreach. Also conducted a pedestrian survey of the project area. Produced a report summarizing the finding of the cultural resources inventory including an impact analysis of a National Register of Historic Places listed resource, resource management recommendations, and avoidance measures.

Kaiser Permanente Murrieta Valley Medical Center Project, City of Murrieta, Riverside County, California. Managed the cultural resource monitoring of the construction of a Kaiser Permanente medical center in the City of Murrieta. Responsibilities included consultation with program representatives, scheduling and management of field technicians, consultation with Native American representatives, oversite of daily field logs, recordation of identified cultural resources, and submission of a summary document at the completion of the project.

Kettner Lofts Project, City of San Diego, San Diego County, California. Managed the preliminary cultural resources testing and the construction monitoring of the Kettner Lofts housing development in the City of San Diego. Responsibilities included directing construction personnel in the excavation of testing trenches, documentation of subsurface findings, and consulting with program representatives to establish an appropriate monitoring plan. Management of construction monitoring included scheduling and management of field technicians, consultation with Native American representatives, oversite of daily field logs, recordation of identified cultural resources, and submission of a summary document at the completion of the project.

Rincon Del Diablo Sewer Master Plan Project, San Diego County, California. Served as cultural resources project lead for the proposed sewer master plan near the City of Escondido. Responsibilities included analysis of archived records, aerial photographs, and Native American outreach. Conducted a pedestrian survey of the project area. Produced a report summarizing the finding of the cultural resources inventory including a cultural resources impact analysis comparing alternate project routes and resource management recommendations.

Terra Vista Development Project, Victorville, San Bernardino County, California. Served as cultural resources project lead for a proposed residential development in Rancho Cucamonga. Responsibilities included analysis of archived records, aerial photographs, and Native American outreach. Also conducted a pedestrian survey of the project area. Produced a report summarizing the finding of the cultural resources inventory including resource management recommendations.

Commercial Development Project, Morongo Valley, San Bernardino County, California. Served as cultural resources project lead for a proposed commercial development on Twenty-nine Palms Highway, Morongo Valley. Responsibilities included analysis of archived records, aerial photographs, and Native American outreach. Also conducted a pedestrian survey of the project area. Produced a report summarizing the finding of the cultural resources inventory including resource management recommendations.

South Amargosa Plaza Project, Victorville, San Bernardino County, California. Served as cultural resources project lead for a proposed commercial development in Victorville. Responsibilities included analysis of archived records, aerial photographs, and Native American outreach. Also conducted a pedestrian survey of the project area. Produced a report summarizing the finding of the cultural resources inventory including resource management recommendations.

RCP Walker Trails Project, City of Santee, San Diego County, California. Served as cultural resources project lead for the proposed construction of a residential community in the City of Santee. Responsibilities included analysis of archived records, aerial photographs, and Native American outreach. Conducted a pedestrian survey of the project area in coordination with a Native American Monitor. Produced a report summarizing the finding of the cultural resources inventory including a cultural resource impact analysis and management recommendations.

1836 Columbia Street Project, City of San Diego, San Diego County, California. Served as cultural resources project lead for a proposed urban development project in the City of San Diego. Responsibilities included analysis of archived records, aerial photographs, and Native American outreach. Also conducted a pedestrian survey of the project area and coordination with a Native American monitor. Produced a report summarizing the finding of the cultural resources inventory and mitigation recommendations.

West of Devers Upgrade Project, Southern California Edison (SCE), Riverside and San Bernardino Counties, California. Served as project manager for a cultural resource impact assessment for a dual transmission line upgrade spanning from North Palm Springs to San Bernardino, California. Tasks included implementing archaeological surveys and excavations, producing a cultural resource evaluation report, and participation in

construction site visits with SCE staff and construction specialists to resolve construction/resource conflicts. Preconstruction activities are nearing completion.

Devers to Palo Verde 2 (DPV2) Transmission Line Project, SCE, Riverside County, California. Served as field director for the archaeological monitoring and resource management for the construction of a 500-kV transmission line spanning from Blythe to Romoland, California. Tasks included conducting archaeological surveys and excavations; managing construction monitoring teams; producing cultural resource records and reports; and consulting with SCE, construction, and Native American representatives. The final cultural resource report has been submitted and is awaiting approval.

Mountain Top Healthy Trees Project, USFS, Mount Pinos Ranger District, Santa Barbara County, California. Served as acting district archaeologist for a proposed tree thinning project. To ensure that no previously recorded resources were impacted during the tree mastication, Mr. DeCarlo conducted a records search, delineated mastication boundaries, and monitored the mastication activities.

ARRA Wilderness Trails Restoration Project, USFS, Mount Pinos Ranger District, Santa Barbara and Ventura Counties, California. Served as acting district archaeologist. Fulfilled cultural resource requirements for National Environmental Policy Act (NEPA) compliance to ensure the Mount Pinos Ranger District of the Los Padres Forest received American Recovery and Reinvestment Act (ARRA) federal funds to conduct trail work within wilderness areas. This required consultation with USFS supervisors to construct a viable timetable, completion of a records search, intensive survey of trails, and collaboration with trail maintenance crew chiefs to protect threatened cultural resources.

Day Fire Reforestation Project, USFS, Mount Pinos Ranger District, Ventura County, California. Served as acting district archaeologist for the reforestation of areas burned during the 2007 Day Wildfire. Prior to the planting of pine tree saplings, Mr. DeCarlo performed a records search, conducted an archaeological inventory, and evaluated the post-fire condition of previously identified archaeological sites. A survey report and archaeological site records were submitted to the Los Padres National Forest Headquarters and tree saplings were planted in the spring of 2010.

Sierra Madre Ridge Archaeological Survey and Rock Art Recordation Project, USFS, Mount Pinos Ranger District, Santa Barbara County, California. Served as field chief for the Sierra Madre Ridge Project, a Section 110 of the National Historic Preservation Act (NHPA) project consisting of three 1-week expeditions to update site records and survey previously unrecorded portions of a known archaeological district. Tasks included leading and training volunteer teams in survey and site recordation methods, updating previously recorded archaeological sites, identification of new sites, surveying previously unrecorded land, and managing fuels near significant sites to prevent possible fire damage. A survey report, site records, and GIS mapping were completed and submitted to the Los Padres National Forest Headquarters.

NEPA Compliance for the New Chuchupate Ranger Station, USFS, Mount Pinos Ranger District, Ventura County, California. Served as acting district archaeologist. To ensure NEPA compliance and ensure acquisition of ARRA federal funds, conducted a records search, collaborated with the Forest Tribal Liaison, updated previously recorded sites, mapped the existing Chuchupate Ranger Station, conducted an intensive survey, contracted an architectural historian, and submitted a report to the Los Padres National Forest Headquarters.

Sapaski (Painted Rock) Tribal Protection Meeting, USFS, Mount Pinos Ranger District, Ventura County, California. Served as acting district archaeologist for the Sapaski Tribal Protection Meeting, a collaborative effort with tribal representatives and USFS supervisors to protect a significant rock art resource. Conducted a records search and suggested possible protection strategies to tribal representatives.

Archaeological Investigation for the Yellow Jacket Fire Project, USFS, Mount Pinos Ranger District, Ventura County, California. Served as acting district archaeologist for the archaeological investigation after the Yellow Jacket Fire. Conducted a records search to identify any previously identified cultural resource within burned or staging areas, appraised sites impacted by both fire and fire-fighting measures, consulted with fire personnel to determine possible impacts, and submitted a report to the Los Padres National Forest Headquarters.

CURRICULUM VITAE

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Education

1996	BS, Anthropology, University of California Davis
2001	MA, Archaeology, California State University, Sacramento
2009	Ph.D., Anthropology, University of California, Davis

San Diego County Archaeology Experience—Supervisory Level

Affiliation	Client	Project Description	Dates	Weeks / days
Dudek	City of San Diego	On Call Archaeological and Paleontological Resources Services	2015-Present	Ongoing
Dudek	City of San Diego	Morena Reservoir Archaeological Inventory	2014-2015	16 weeks
Dudek	City of San Diego	Barret Reservoir Archaeological Inventory	2015-Present	12 weeks
Dudek	SANDAG	Third Party Cultural Resources Review for the Bridge 249.9 Project, Sorrento Valley. Acted as Principal Investigator and Report Author.	2013	2 weeks
Dudek	SANDAG	Cultural Resources Monitoring for the San Onofre to Las Pulgas Double Track project. Acted as Principal investigator.	2013-2015	2 weeks-ongoing
Dudek	County of San Diego	Cultural Resources Monitoring for the Rancho Guajome Utilities Undergrounding Project. Acted as Project Manager and Principal Investigator; report co-author.	2013	1 weeks
Dudek	County of San Diego	Cultural Resources Monitoring for the Pine Valley Sheriff Station Project. Acted as Project Manager and Principal Investigator; report co-author.	2013	2 weeks
Dudek	County of San Diego	Cultural Resources Monitoring for the Camp Locket Propane Project. Acted as Project Manager and Principal Investigator; report co-author.	2013	6 weeks

Dudek	Soitec	Cultural Resources Monitoring for the Desert Green Solar Project. Acting as Project Manager and Principal Investigator.	2013-present	1 week-ongoing
Dudek	E2 Managetech; San Diego Unified School District	Cultural Resources Inventory for the 5th Avenue Development Project. Acted as Project Manager and Principal Investigator; co-authored report.	2013-present	1 week
Dudek	Darco Engineering	Historical Building Evaluations for the Normal Street Redevelopment Project. Acing as Project Manager.	2013-present	1 week-ongoing
Dudek	Chris Lischewski	Cultural Resources Inventory for the Artesian Road Property. Acted as Project Manager and Principal Investigator.	2013-present	1 week-ongoing
Dudek	All Creatures Hospital	Cultural Resources Inventory for the All Creatures Hospital Expansion Project. Acted as Project Manager and Principal Investigator; authored report.	2013	1 week
Dudek	RBF	Cultural Resources Monitoring for the Sol Orchard Ramona Solar Project. Acted as Project Manager and Principal Investigator; co-authored report.	2013	2 weeks
Dudek	RBF	Cultural Resources Inventory for the Valley Center Solar Project. Acted as Project Manager and co-Principal Investigator; co-authored report.	2013	1 week
Dudek	County of San Diego	Cultural Resources Inventory for the Blue Mountain Preserve Pipeline Project. Acted as Project Manager.	2013	1 week
Dudek	City of Vista	Cultural Resources Inventory for the Buena Vista Creek Revegetation Project. Acted as Project Manager and Principal Investigator; report author.	2012	1 week
Dudek	Daybreak Church	Cultural Resources Inventory for the Daybreak Church Expansion Project. Acted as Project Manager and Principal Investigator; report author.	2013	1 week
Dudek	Kaiser	Cultural Resources Inventory for the Kaiser San Diego Hospital. Acted as Project Manager and Principal Investigator; report author.	2012	1 week
Dudek	City of Escondido	Cultural Resources Inventory for the Rock Springs Pipeline Realignment Project. Acted as Principal Investigator.	2013	1 week
Dudek	San Diego County Water Authority	Cultural Resources Inventory and Mitigation Monitoring for Desalination Pipes 3 and 4. Acted as Principal Investigator.	2013	1 week

Dudek	Poseidon Resources	Poseidon Wetland Mitigation Site Evaluation Report (in progress). Acted as Project Manager and Principal Investigator; co-author of technical report.	2013 (ongoing)	12 weeks
Dudek	St. John Garabed Apostolic Armenian Church	St. John Garabed Church Phase II Testing. Acted as Project Manager and co-Principal Investigator; co-authored report	2013	4 weeks
Dudek	Soitec LLC	Archaeological Inventory and Evaluation of 19 Prehistoric Sites for the Tierra del Sol Gen-Tie Project, Boulevard, CA. Acted as Project Manager and Principal Investigator, and co-authored report.	2103	8 weeks
Dudek	Poseidon Resources	Carlsbad Desalination Plant, Carlsbad, CA. Acted as Project Manager and Principal Investigator for cultural resources studies and mitigation.	2013	8 weeks
Dudek	Soitec LLC	Archaeological Inventory and Evaluation of 40 Archaeological Sites for the Rugged Solar Project. Acted as Project Manager and co-Principal Investigator; co-authored report.	2012-2013	16 weeks
Dudek	Newland Homes	Phase III Archaeological Data Recovery and Mitigation Monitoring for the Newland Homes Sierra Project, Deer Springs Road. Acting as Project Manager and co-Principal Investigator; co-authoring report.	2013-present	2 weeks-ongoing
Dudek	BLM	Third Party Compliance Cultural Resources Oversight to the Bureau of Land Management for the Tule Wind Project. Acted as Project Manager and Principal Investigator.	2012-present	8 weeks
Dudek	BLM and CPUC	Third Party Compliance Cultural Resources Oversight to the Bureau of Land Management and California Public Utilities Commission for the East County Substation Project. Acted as Project Manager and Principal Investigator.	2013	16 weeks
Dudek	BLM	Third Party Compliance Cultural Resources Oversight to the Bureau of Land Management for the Rio Mesa Solar Project. Acted as Project Manager and Principal Investigator.	2012	8 weeks
ASM Affiliates	California State Parks	Archaeological Data Recovery Excavations at Border Fields State Park. Co-Principal Investigator and Field Director.	2006	4 weeks

ASM Affiliates	City of San Diego	Phase II Archaeological Evaluation of Two Prehistoric Sites, Torrey Pines Glider Port, San Diego County, California, 2012. Acted as Project Manager and Principal Investigator, co-authored report for the Torrey Pines City Park General Development Plan.	2011-2012	8 weeks
ASM Affiliates	City of San Diego	Phase III Mitigation for Geotechnical Monitoring at the University House, UCSD. Acted as Project Manager and Principal Investigator, co-authored report.	2009-2011	12 weeks
ASM Affiliates	NOAA	Phase I Inventory and Phase II Evaluation of One Archaeological Site for the NOAA SW Fisheries Building Project. Acted as Project Manager and Principal Investigator, co-authored report.	2010	2 weeks
ASM Affiliates	RBF	Phase I Inventory and Phase II Cultural Resources Evaluation for the Star Ranch Project, Acted as Project Manager and Principal Investigator, co-authored report.	2011-2012	8 weeks
ASM Affiliates	Sea Breeze Properties	Data Recovery of One Prehistoric Site for the Rhodes Property, Sea Breeze Properties. Acted as Project Manager and Principal Investigator, co-authored report.	2010-2011	6 weeks
ASM Affiliates	Pardee Homes	Data Recovery at the Pankey Site, City of Escondido. Acted as Project Manager and Principal Investigator during construction monitoring and discovery treatment.	2011-2012	12 weeks
ASM Affiliates	Padre Dam Municipal Water District	Phase III Data Recovery for the Ridge Hill facilities site. Acted as Principal Investigator and report author.	2010-2011	20 weeks
ASM Affiliates	RBF Consulting	Significance Evaluation of Four Prehistoric Archaeological Sites for the Sol Focus Project, Borrego Springs. Acted as Project Manager and Principal Investigator; co-authored report.	2011	3 weeks
ASM Affiliates	Iberdrola Renewables	Phase I Cultural Resources Inventory for the Tule Wind Project. Acted as Project Manager and Principal Investigator; authored report.	2011-2012	16 weeks
ASM Affiliates	Camp Pendleton MCB	Archaeological Investigations at SDI-9824. Acted as Project Manager and Principal Investigator; co-authored report.	2011	4 weeks

ASM Affiliates	San Marcos USD	Significance Evaluation of SDI-20363 for the San Marcos High School Expansion Project. Acted as Principal Investigator and report co-author.	2011	4 weeks
ASM Affiliates	RBF	Cultural Resources Inventory and Evaluation of 4 Archaeological Sites for the Gildred Solar Project, Borrego Springs. Acted as Project Manager and Principal Investigator; co-authored report.	2011	4 weeks
ASM Affiliates	RBF	Cultural Resources Inventory and Evaluation of 2 Archaeological Sites for the Borrego A and B Solar Project, Borrego Springs. Acted as Project Manager and Principal Investigator; co-authored report.	2011	2 weeks
ASM Affiliates	Jackson-Pendo	Archaeological Data Recovery at one Prehistoric Site in Escondido. Acted as Principal Investigator; authored report.	2005	3 weeks
ASM Affiliates	Bureau of Land Management	Archaeological Salvage Excavations of Two Ollas in Hellhole Canyon. Acted as Principal Investigator; authored report.	2005	1 week
ASM Affiliates	Caltrans District 11	Archaeological Testing and Ground Penetrating Radar Study of the Forester Creek Biological Mitigation Area, Santee. Acted as Principal Investigator; report coauthor.	2004	4 weeks
ASM Affiliates	NAVFAC SW	Archaeological Inventory of Prehistoric Sites on Naval Base Point Loma. Acted as Principal Investigator; authored report.	2004	8 weeks
ASM Affiliates	North County Transit District	Cultural Resource Inventory for the Bridge 230.6 Replacement Project, Agua Hedionda, Carlsbad. Acted as Principal Investigator; authored report.	2004	2 weeks
ASM Affiliates	City of San Diego Metropolitan Water District	Cultural Resources Inventory for the San Clemente Canyon Trunk Sewer Replacement Project. Acted as Principal Investigator; authored report.	2004	1 week
ASM Affiliates	City of San Diego Metropolitan Water District	Cultural Resources Inventory for the Lake Murray Trunk Sewer Replacement Project. Acted as Principal Investigator; authored report.	2003	1 week

Appendix D

(Confidential) Cultural Resources Maps and Updated DPR Forms

Appendix E

CA-SDI-11,424 Data Recovery Program

Data Recovery Program and Research Design

For CA-SDI-11424 for the Collection at Cactus Apartment Project, City of San Diego, California

MAY 2025

Lead Agency:

CITY OF SAN DIEGO
City Planning Department
202 C Street, M.S. 413
San Diego, California 92130

Prepared for:

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Approved by:

Micah Hale, PhD, RPA

Table of Contents

SECTION **PAGE NO.**

FIGURES

ATTACHMENTS

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
City	City of San Diego
CRHR	California Register of Historical Resources
CU	control unit
MLD	most likely descendant
PRC	California Public Resources Code
Project	Collection at Cactus Apartments
RPA	Register of Professional Archaeologists
STP	shovel test pit

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1 Introduction

Dudek was retained by JPI Real Estate Acquisition, LLC (project proponent) to conduct a historical resources inventory in support of the proposed The Collection at Cactus Apartment Project (Project). The Project proposes a residential development with supporting recreational amenities and infrastructure of approximately 39.62 acres (Figure 1). A records search review identified two resources within the Project area of potential effect (APE): CA-SDI-7208, a prehistoric lithic scatter, and CA-SDI-11,424, a prehistoric temporary campsite. Portions of CA-SDI-7208 were tested and recommended not significant under CEQA and not eligible for listing on the NRHP (Hector 1984; Cheever and Davis 1988); however, no portion of CA-SDI-7208 has been previously tested within the current Project APE. CA-SDI-11,424 was tested and a "significant/primary site area" was recommended as eligible for nomination to the NRHR and consequently, eligible for listing in the CRHR (Kyle et al. 1997).

Dudek conducted an intensive pedestrian survey of the entire Project APE and the areas of the previously recorded sites, CA-SDI-7208 and CA-SDI-11,424 within the Project APE boundary. A total of 39 lithic artifacts were identified within the Project APE (Montifolca et al. 2025). Dudek conducted extended Phase I subsurface probes within previously unevaluated portions of CA-SDI-7208 and CA-SDI-11,424 to determine if these portions of the resources possess subsurface components that required evaluation testing. These probes, including nine STPs and ten trenches, revealed that sediments consisted of largely silty clay loam that was greatly disturbed by previous agricultural activities. These subsurface probes identified only four metavolcanic lithic flakes whose dispersal horizontally and vertically are likely the result of repeated agricultural activity.

Considering the extremely low yield of cultural material from the extended Phase I probes and the disturbed soils, previously unevaluated portions of CA-SDI-7208 and CA-SDI-11,424 do not possess a subsurface component within the current Project APE, beyond the previously identified "significant/primary site area" of CA-SDI-11,424 identified by Kyle et al. (1997). Without subsurface components, Dudek does not recommend archaeological evaluation testing of CA-SDI-7208 within the Project APE nor the portions of CA-SDI-11,424 outside of the previously identified "significant/primary site area" (Kyle et al. 1997).

Reviewing the results of Kyle et al. (1997) evaluation testing, Dudek (Montifolca et al. 2025) determined that a 4,500 sq. m portion of CA-SDI-11,424 contains intact subsurface cultural deposits that have yielded, and are likely to yield, information important in prehistory. Thus, Dudek recommended that this 4,500 sq. m portion of CA-SDI-11,424 constitutes the contributing element that makes the site eligible for listing in the NRHP and significant under CEQA and the City of San Diego guidelines. The current Project cannot avoid impacts to these significant deposits of CA-SDI-11,424. Dudek (Montifolca et al. 2025) recommended implementation of a data recovery excavation program within the significant deposits of CA-SDI-11,424. This document presents the data recovery program and research design to mitigate the impacts to CA-SDI-11,424.

The City of San Diego (City) is the lead agency responsible for ensuring that the data recovery program and research design complies with cultural resources guidelines identified in the California Environmental Quality Act (CEQA) and City's Historical Resources Guidelines. Micah Hale, PhD, is the Principal Investigator for Dudek and is listed as a City certified archaeologist.

1.1 Project Description

The Project is located east of Cactus Road, west of Continental Road, north of Airway Road, and south of State Route (SR) 905, in the City of San Diego, California. The Project area falls in Section 33, Township 18 South, Range 1 West of the Otay Mesa, CA U.S. Geological Service (USGS) 7.5-minute series topographic Quadrangle map (Figure 1). The Project is part of the Otay Mesa Central Village Specific Plan (CVSP), adopted by the City on April 4, 2017. The Project proposes to construct 985 multifamily residential units, including 83 Affordable units, and would allow for the future development of a 3.5-acre park. The Project site encompasses one Assessor's Parcel Number (APN) 646-100-77. The Project site is approximately 38.80 acres, all of which are proposed to be graded, including the location of CA-SDI-11,424. The significant deposits measure approximately 4,500 sq. m (Figure 2 in Confidential Attachment A)

1.2 Regulatory Context

The following section provides a summary of the applicable regulations, policies, and guidelines relating to the proper management of cultural resources.

1.2.1 California Register of Historical Resources (California Public Resources Code Section 5020 et seq.)

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

- 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.

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 (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.

1.2.2 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.

1.3.3 California Native American Graves Protection and Repatriation Act

The California Native American Graves Protection and 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 act also provides a process for the identification and repatriation of these items to the appropriate tribes.

1.2.4 California Environmental Quality Act

As described further below, the following CEQA statutes and CEQA Guidelines (14 CCR 15000 et seq.) 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; 14 CCR 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; 14 CCR 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; 14 CCR 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" (14 CCR 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 the City of San Diego Historic Guidelines section of this report for a discussion of the CEQA Guidelines for determining significance and mitigating impacts to unique archaeological resources.

1.2.5 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, the 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]). PRC Section 5097.98 also outlines the process to be followed in the event that remains are discovered. If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact the California Native American Heritage Commission (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.

1.2.6 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 recission, 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 or 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.

1.2.7 Addendum to a Program Environmental Impact Report for the Central Village Specific Plan, Otay Mesa Community, San Diego, California Project No. 408329 SCH # 2004651076

The Addendum to the Program Environmental Impact Report (EIR) for the Central Village Specific Plan provides the following analysis and mitigation (abbreviated) (City of San Diego 2017):

The Otay Mesa Community Plan Update (OMCPU) EIR found that impacts to prehistoric and historical resources would include substantial adverse aesthetic impacts as well as adverse physical alteration, relocation, or demolition of prehistoric and historic buildings, structures, objects, landscapes, and sites. The OMCPU EIR also determined that impacts from future development also could occur at the project-level. The OMCPU EIR identified Mitigation Frameworks HIST-1 and HIST-2 to reduce potential aesthetic and physical impacts to prehistoric and historic resources.

Mitigation Framework HIST-1 would require the preparation of a site-specific archaeological study and implementation of appropriate mitigation to be conducted prior to the issuance of any permit for a future development project that could potentially affect a prehistoric or historical resource.

Mitigation Framework HIST-2 would require the City to determine whether the affected building or structure is historically significant per the Historical Resources Guidelines prior to the issuance of any permit for a future development project that would directly or indirectly affect a building or structure that is more than 45 years of age.

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2 Guidelines for Determining Significance

According to CEQA (Section 15064.5b), a project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. CEQA defines a substantial adverse change as "substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired."

The significance of a historical resource is materially impaired when a project does any of the following:

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

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

- When a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource, as defined in subsection (a).
- If a lead agency determines that the archaeological site is an historical resource, it shall refer to the provisions of Section 21084.1 of the Public Resources Code, and this section, Section 15126.4 of the Guidelines, and the limits contained in Section 21083.2 of the Public Resources Code do not apply.
- If an archaeological site does not meet the criteria defined in subsection (a), but does meet the definition of a unique archaeological resource in Section 21083.2 of the Public Resources Code, the site shall be treated in accordance with the provisions of Section 21083.2. The time and cost limitations described in Public Resources Code Section 21083.2 (c–f) do not apply to surveys and site evaluation activities intended to determine whether the project location contains unique archaeological resources.
- If an archaeological resource is neither a unique archaeological nor an historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment. It shall be sufficient that both the resource and the effect on it are noted in the Initial Study or EIR [Environmental Impact Report], if one is prepared to address impacts on other resources, but they need not be considered further in the CEQA process.

Section 15064.5 (d) and (e) contain additional provisions regarding human remains. Regarding Native American human remains, paragraph (d) provides the following:

> When an initial study identifies the existence of, or the probable likelihood, of Native American human remains within the project, a lead agency shall work with the appropriate Native Americans as identified by the Native American Heritage Commission as provided in PRC SS5097.98. The applicant may develop an agreement for treating or disposing of, with appropriate dignity, the human remains and any items associated with Native American burials with the appropriate Native Americans as identified by the Native American Heritage Commission. Action implementing such an agreement is exempt from:
>
> - The general prohibition on disinterring, disturbing, or removing human remains from any location other than a dedicated cemetery (Health and Safety Code Section 7050.5); and
> - The requirements of CEQA and the Coastal Act.

As lead agency, the City implements its *California Environmental Quality Act (CEQA) Significance Determination Thresholds* (City of San Diego 2022a) to assess whether a proposed project may have a significant effect on the environment under Section 21082.2 of CEQA. Included in this document are the Initial Study Checklist Questions and Significance Thresholds.

1. An alteration, including the adverse physical or aesthetic effects and/or the destruction of a prehistoric or historic building (including an architecturally significant building), structure, or object or site?
2. Any impact to existing religious or sacred uses within the potential impact area?
3. The disturbance of any human remains, including those interred outside of formal cemeteries?
4. A substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
    i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or
    ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

3 Research Design

Enough information on the archaeological assemblage was obtained by Kyle et al. (1997) and Montifolca et al. (2025) to evaluate historical significance under CEQA and the City Guidelines. Kyle et al. (1997) identified the 6.26-acre "significant/primary site area" portion of CA-SDI-11,424 while Montifolca et al. (2025) identified the 4,500 sq m. area that contains significant deposits and determined that the remainder of CA-SDI-11,424 did not contain a significant subsurface cultural deposit and did not contribute to the significance of the resource. The objective of the data recovery phase of this Project is to obtain a sufficiently large and diverse archaeological assemblage data from the significant deposits of CA-SDI-11,424 to answer the following research questions. Data recovery would implement a larger-scale excavation in order to collect the necessary archaeological materials to answer the research questions presented below.

3.1 Integrity and Structure of Archaeological Deposits

Delineation of the horizontal distribution and vertical depth of an archaeological site is necessary to determine archaeological significance. Of particular importance is the integrity of the deposits: whether or not features or surfaces are preserved and whether the potential exists for identifying horizontal and vertical spatial patterning between artifacts and features. Evaluation testing of the "significant/primary site area" portion of CA-SDI-11,424 indicated that the upper 30 to 40 cm of soils were largely mixed by repeated agricultural activities while intact midden deposits extending to depths of 140 cm (Kyle et al. 1997).

A variety of post-depositional disturbance processes can greatly alter the original character of prehistoric sites (e.g., Gross and Robbins-Wade 2008; Schiffer 1987; Waters 1992). Formation processes such as alluvial deposition, erosion, bioturbation, and modern disturbance can considerably affect the integrity of archaeological sites. Here, attempts are made to identify and interpret the processes that formed the site, with particular attention given to the character of post-depositional processes and the extent to which they have affected the integrity of the archaeological deposits and the spatial relation between artifacts. As an example, if an occupation 5,000 years ago that left groundstone tools along with flaked stone tools became mixed through deep plowing with deposits from a 500-year-old occupation that did not leave groundstone tools, interpretation of the later deposit could erroneously include groundstone tools without additional controls. In this way, depositional integrity plays a key role in interpretation of significance.

The data recovery program applied to archaeological deposits within the Project area will be used to address the following issues:

- Does the horizontal and vertical extent of the archaeological record represent continuous or multiple discrete occupations?
- Is it possible to discern depositional versus post-depositional processes that have contributed to the present condition of the archaeological record? In other words, what are the factors, both natural and anthropogenic, that have altered the position and condition of artifacts?
- Is there a consistent range of depths which are impacted by repeated agricultural activities.

- What kinds of features have been preserved (e.g., hearths, earth ovens)? Are there features that are highly disrupted by post-depositional processes but that are still recognizable? Can these features be associated with particular functions?
- By examining spatial patterns in the horizontal distribution of artifacts, is it possible to discern areas that were associated with specific functions? Do patterns in the vertical distribution of artifacts tell us anything about changes in the function, materials exploited, or human activities through time?

3.2 Chronological Placement

Chronological issues are basic to any archaeological research design because they provide the primary framework of prehistory. Previous research in the southern San Diego region has documented a range of prehistoric sites dating to both the Archaic (6000 BC to AD 500) and Late Prehistoric periods (post-AD 500), and even the Paleoindian period (pre-6000 BC). Previous evaluation testing of the "significant/primary site area" portion of CA-SDI-11,424 produced radiocarbon dates between 3380+/- 100 BP and 7240 =/- 80 BP, dates which "fit well with other dates obtained from other sites on Otay Mesa" (Kyle et al 1997)

Because chronological controls are essential to any archaeological investigation, several basic questions concerning the additional temporal data potential of CA-SDI-11,424 pertains to the current study, including the following:

- What kinds of additional chronometric data can the site provide?
- Are there data indicating the presence of multiple occupation episodes at the site?
- Do diagnostic artifacts appear to fit with temporal patterns recognized in the surrounding region? Are there any unique diagnostic items present?
- Can additional chronometric data from CA-SDI-11,424 help to refine dating schemes in the local region or is there additional data indicating occupational episodes outside of the local region's dating schemes?

Potential chronometric evidence from CA-SDI-11,424 includes additional radiocarbon dates, obsidian hydration measurements, and diagnostic artifact forms. Radiocarbon dates are generally the most precise and reliable form of chronometric evidence, and they provide the foundation for the region's prehistoric chronology. However, obsidian hydration measurements may have a more direct cultural interpretation because they are individually less expensive to run, and they can address very late prehistoric to protohistoric time periods that cannot be distinguished through radiocarbon dating. Chronologically diagnostic artifacts include various projectile point forms and pottery, although these only define very broad time periods. Specific types or attributes of buffware ceramics may have a potential to define somewhat more precise time ranges, but that potential is not yet well established.

3.3 Settlement and Site Function

Interpretation of study sites depends on an assessment of their places within the larger settlement-subsistence system of their occupants. Sites belonging to functional types that are relatively ubiquitous within the region would be less likely to be considered significant than unusual site types. Sites with evidence of multiple functions may possess richer information content than relatively simple sites; on the other hand, single-function sites may have a greater research potential than multiple-function sites if the residues from the various activities at the latter cannot be effectively differentiated.

Evidence for the functional uses represented by a site come from surface observations made during survey and testing phases, as well as through the results of subsurface excavations. Interpretations of functions rest upon the range and the relative and absolute frequencies of various classes of features, artifacts, and ecofacts. The recovery of core/cobble tools and flake tools from the "significant/primary site area" portion of CA-SDI-11,424 led Kyle et al (1997) to interpret that the working of soft woods and reeds were an important focus of site function, and likely centered on the processing of plant and/or material resources. The wide variety of tools indicates the residents at CA-SDI-11,424 were sophisticated knappers while the presence of ground stone, fire-hearths, bone, and shell attest to the preparation and cooking of food at the site.

The data recovery program applied to archaeological deposits within the Project area will be used to address the following issues:

- Is there additional evidence supporting an emphasis on soft wood and reed processing?
- Does the horizontal distribution of artifacts or features indicate different site functions?
- What does the debitage assemblage imply about the production and/or maintenance of stone tools at sites?

3.4 Subsistence

The issues related to subsistence are interwoven with the previously discussed settlement, and this section complements the issues discussed previously. Animal remains and invertebrate remains were identified during the previous evaluation efforts of the "significant/primary site area" portion of CA-SDI-11,424. Identifiable faunal remains were predominantly from rabbit and hare species and rodents. Plant materials were not identified in the previous study. Data recovery efforts may recover additional faunal remains and provide the opportunity to record plant material. Some questions that can be addressed with these materials include the following:

- Are floral remains present in archaeological deposits?
- What additional species are represented at the site.
- Which specific resources were exploited?
- Can changes in the emphasis on specific resources be detected and are these changes related to changes in procurement?
- Do recovered resources provide indications of seasonal harvesting or occupation of the area?

To address these issues, floral remains could be recovered from flotation of feature or midden soils. Subsistence is often assessed indirectly through technology. Groundstone tools are a good indicator that plant processing occurred, and projectile points generally indicate animal exploitation. Subsistence can also be indirectly inferred from flake-based implements. Such inferences have been the norm in greater San Diego County since the earliest archaeological work was completed, and especially during the emphasis in the 1960s on investigating "Millingstone Horizon" assemblages with their abundant scraping tools (e.g., Kaldenberg 1982; Warren 1967). The robust archaeological literature compiled for the region in the decades since has helped refine assumptions about the purpose of cobble tools, making inferences about subsistence less tenuous (Buonasera 2013; Hale 2001; Kowta 1969).

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4 Methods

This chapter describes the techniques to be employed during data recovery of the significant deposits of CA-SDI-11,424 (Figure 2 in Confidential Attachment A). All methods and Project personnel exceed the Secretary of Interior's guidelines.

4.1 Field Methods

The field methods and procedures identified in this data recovery program were developed and applied by the authors over many years of archaeological investigation in Southern California and the Great Basin (e.g., Hale and Becker 2006; Hale and Comeau 2010). Specifically, these methods have been designed to identify rich cultural deposits and maximize artifact recovery, while allowing for careful documentation and treatment of archaeological features with a practical level of provenience control.

Data recovery will be accomplished using surface collection and excavation units. Surface collection of individual artifacts was previously conducted by Kyle et al. (1997). For the data recovery of the significant deposits of CA-SDI-11,424 (Figure 2 in Confidential Attachment A), Dudek will resurvey the surface of CA-SDI-11,424 and point-plot collect any tools that were missed during the previous surface collection or that have been exposed due to subsequent agricultural activities. Although data recovery may include mechanical trenching, Dudek recommends that a 2.5% hand-excavated sample of the subsurface artifact concentration within the significant deposits of CA-SDI-11,424. Due to the compacted sediments and known agricultural disturbance of the upper 30 to 40 cm, mechanical excavation may be utilized to remove the upper surface of the test units for hand excavation. Hand excavation will be conducted using shovel test pits (STPs), shovel test units, and control units (CUs). STPs are 0.5 x 0.25 meters that are excavated in decimeter levels. Shovel test units are 1 x 0.5 meters and excavated in decimeter levels. CUs are 1 x 1 meter, excavated in decimeter levels. Should an excavation unit identify a feature, the unit will be expanded to expose 100% of the feature. Regardless of excavation method, all excavated matrices will be screened through 1/8-inch (3-millimeter) wire mesh, and all cultural materials will be collected, bagged, and transported back to Dudek's archaeological laboratory facility for processing and curation preparation.

Photographs and profile drawings will be recorded to document soils and disturbances in CUs, shovel test units, and some STPs. Excavation units and surface artifact locations will be recorded using a Trimble GeoXT handheld GPS device with sub-meter accuracy. Field notes will be recorded on standardized forms to log artifact recovery, soil descriptions, disturbances, and any other pertinent information. Soil column samples for floatation will be collected from units if dense midden soil is encountered. Column samples are 20 x 20 x 10 centimeters (length by width by depth) and are collected from the full depth of the deposit.

The previous archaeological testing at CA-SDI-11,424 (Kyle et al 1997) identified a "significant/primary site area" within the recorded boundary of CA-SDI-11,424 and recommended it significant under CEQA and eligible for listing in the CRHR (Figure 2 in Confidential Attachment A). After reviewing the cultural material yields from the 27 STPs, 18 backhoe trenches, and 15 1x1 m test units at CA-SDI-11,424, Dudek determined that a 4,500 sq. m portion of CA-SDI-11,424 contains intact subsurface significant deposits that constitute the contributing element making the site eligible for listing in the NRHP and significant under CEQA and the City of San Diego guidelines. Although the subsurface deposits within the resource have been highly impacted by previous agricultural ground disturbance, the significant deposits of the resource produced a large volume of archaeological material and has a high potential to yield data important to prehistory. The recommended 2.5% hand excavation of the 4,500 sq. m significant deposit area equals 113 1 x 1 CUs. Subtracting the nine 1 x 1 CUs already excavated within the significant deposits by Kyle

et al. (1997), data recovery will require an estimated 104 CUs will be excavated, though supplemental mechanized excavation may be necessary depending on ground conditions. Concerning depth, Kyle et al. (1997) identified intact cultural midden to depths of 140 cmbs.

4.2 Laboratory and Cataloging Methods

The procedures in the initial processing of recovered cultural material include sorting, cleaning/washing (as appropriate), and cataloging. Prehistoric pottery is not initially cleaned to preserve the possibility of obtaining radiocarbon dates from charred surface residues. All items are individually examined and then cataloged according to class, type, and material. Artifacts other than debitage and aboriginal ceramics are assigned individual catalog numbers. Lithic debitage, ceramics, unworked marine shell, and unworked bone are counted, weighed, and assigned collective catalog numbers for specimens sharing a common provenience and material type. All items are weighed on a standard digital scale.

Coded data is entered into a Microsoft Access database that serves as the master catalog. This catalog is subsequently exported to a Microsoft Excel spreadsheet for purposes of analysis and printing. Entries in the master catalog include the catalog number, recovery type (e.g., STP, auger, or unit), a provenience number (e.g., STP, auger, or unit number), top and bottom depths of the excavation level, sorting method (e.g., 1/8-inch dry screen), class (including biface, simple flaked stone tool, retouched flaked stone tool, formal flaked stone tool, groundstone tools, percussing tools, core, debitage, aboriginal ceramics, vertebrate faunal remains, invertebrate faunal remains, and historic artifacts), and material type (e.g., granitic, volcanic, obsidian, quartz).

Debitage is sorted as primary (with at least 70% dorsal cortex), secondary (dorsal cortex less than 70%), interior (no dorsal cortex), and shatter (no platform or bulb of percussion). When possible, cores will be separated by platform variability into subclasses such as multidirectional, unidirectional, and bifacial types. Percussing tools, potentially including hammers and abraders, are defined based on their morphology and the type of macroscopic use-wear they exhibit. Groundstone artifacts are classified by type, including millingstones, handstones, and pestles. Maximum length, width, and thickness measurements are taken on all prehistoric tools items.

Once preliminary cataloging of the material is completed, more detailed attribute analysis of lithics and groundstone is performed. Stone artifacts (both flaked and ground) are individually analyzed for selected morphological and technological attributes, as well as material and condition, in an attempt to gain insight into the period of occupation and the range of activities undertaken. Ceramic artifacts are initially sorted by traditional ware (Brown or Buff) and sherd fragment types (body, rim, or modified). They are then inspected to identify ceramic types (e.g., Salton vs. Tizon brown), vessel forms, and other modifications.

Column samples are floated in water to separate the light fraction (seeds, charcoal, and other organic material) and the heavy fraction (rocks, artifacts, shell) from the sediment. The heavy fraction recovery will be screened through 1/16th-inch mesh and incorporated into the associated excavation unit's artifactual recovery. If seeds, charcoal, and other materials are recovered in the light fraction, they will be sent to appropriate laboratories or specialists for analysis (e.g., speciation, radiocarbon dating). Other special studies to be considered include obsidian hydration and sourcing, paleoethnobotany, faunal analysis, and protein residue analysis.

4.3 Artifact Curation

All artifacts collected during data recovery will be curated at the San Diego County Archaeological Center where the collection from the Kyle et al. (1997) excavation is held. Should no curation space be available, the newly excavated collection will be curated at a facility within San Diego County.

4.4 Native American Participation

A Kumeyaay Native American monitor will be present during data recovery excavations.

4.5 Reporting

The Project archaeologist will prepare a brief letter summarizing the data recovery fieldwork for submittal to the City at the completion of all fieldwork. The letter will serve as notice that all fieldwork required to address the research questions has been completed and that construction may begin at these locations. A full data recovery report will be prepared, commensurate with City requirements, that documents implementation of the data recovery program, all analyses, and special studies. The draft report will be submitted to the City for review and approval. Upon approval, the final report, including all necessary appendices, will be submitted to the City and the South Coast Information Center.

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5 Summary and Conclusion

This data recovery program for CA-SDI-11,424 for the Collection at Cactus Apartment Project was prepared to implement mitigation for impacts to CA-SDI-11,424 in accordance with City Guidelines, CEQA, and the mitigation measures developed for this Project (Montifolca et al. 2025).

Complete avoidance of CA-SDI-11,424 is not possible, and this data recovery program will be implemented prior to the start of construction. A 2.5% sample of the subsurface artifact concentration will be collected through hand excavation. This will be accomplished through the excavation of CUs within the significant deposits demarcated by Dudek (Figure 2 in Confidential Attachment A). The data recovery program involves excavation of predominately CUs in rich subsurface deposits. In addition to the nine 1 x 1 m CUs previously excavated within the significant deposits (Kyle et al. 1997), it is estimated that 104 CUs will be excavated. A Kumeyaay Native American monitor will participate in the data recovery program.

All collected cultural material will be cleaned and cataloged at Dudek laboratory. Artifacts will undergo lithic, ceramic, faunal, floral, and assemblage analyses. The Project archaeologist will prepare a full data recovery report documenting implementation of this data recovery program, all analyses, and special studies for review by the City. Upon approval, the final report, including all necessary appendices, will be submitted to the City and the South Coast Information Center. All collected material will be curated at the San Diego Archaeological Center unless space is not available, in which case, the collection will be curated at another facility within San Diego County.

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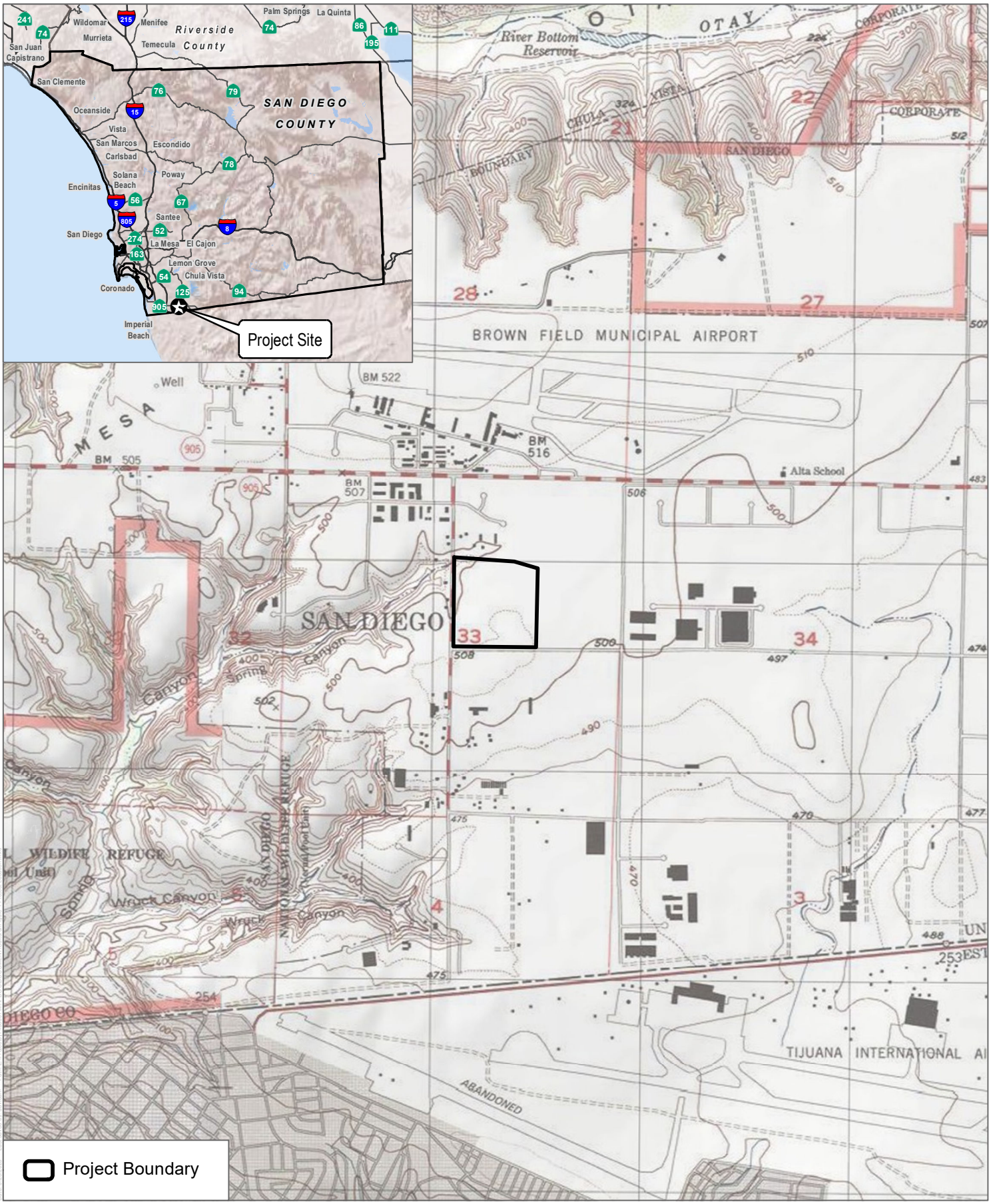

SOURCE: USGS 7.5-Minute Series Otay Mesa Quadrangle
Township 18S/ Range 1W/ Section 33

DUDEK

0 300 600 Meters

FIGURE 1

Project Location

The Collection at Cactus

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Confidential Attachment A

Figure 2. Significant Deposits at CA-SDI-11424