
Appendix D-1

Cultural Technical Memorandum for the
Reduced Development Footprint Alternative -
Vernal Pool Minimization

MEMORANDUM

To: Saima Qureshy, City of San Marcos
From: Matthew DeCarlo, MA, RPA
Subject: Cultural Resources Impact for the Reduced Development Footprint Alternative – Vernal Pool Impact Minimization Plan for the Pacific Specific Plan Project, City of San Marcos, California
Date: March 19, 2024
cc: Vanessa Scheidel, Dudek
Attachment(s): Figures

This letter summarizes a review of potential cultural resource impacts of the Reduced Development Footprint Alternative – Vernal Pool Impact Minimization Plan for the Pacific Specific Plan Project (Vernal Pool Impact Minimization Plan), located in the City of San Marcos, California. The Vernal Pool Impact Minimization Plan would reduce the number of proposed residential units from the original 449 to 228 units. Dudek conducted a cultural resources inventory for the original 33.2-acre Project site (DeCarlo 2022) (Figure 1. Project Location) which included the current Vernal Pool Impact Minimization Plan’s area of potential effect (APE) (Figure 2. Vernal Pool Impact Minimization Plan Map). The original inventory was conducted in compliance with the California Environmental Quality Act (CEQA) and was reviewed by the City of San Marcos as lead agency. The 2022 study of the original Project included a review of archival records, Native American outreach, and pedestrian survey.

Cultural Resources Inventory Results

Dudek requested a records search from the SCIC for the original Project site and a one-mile buffer on March 13, 2021 (DeCarlo 2022). The records search revealed that 69 previous cultural resources studies have been completed within 1-mile of the original Project site, one of which consisted of a records search, archival review, and a pedestrian survey of the entire original Project site. This study identified no cultural resources within the original Project site. The SCIC records search also revealed that no cultural resources have been recorded within the original Project site; the closest resources consisting of highly disturbed prehistoric artifact scatters located 0.4 miles from the original Project site. As no previously recorded resources were identified within the original Project Site, no previously recorded resources were identified within the Vernal Pool Impact Minimization Plan APE.

In addition to the SCIC records search, Dudek conducted an on-line review of historic aerial photographs of the original Project site and general vicinity. The review of the historic aerial images demonstrates that, besides unofficial dirt roads and some limited clearing, there has been no development of the Vernal Pool Impact Minimization Plan APE (DeCarlo 2022).

Dudek requested a Native American Heritage Commission (NAHC) search of the Sacred Lands File (SLF) on March 12, 2021 for the original Project site and 1-mile (DeCarlo 2022). The NAHC reported that the SLF did not identify any known Native American cultural resources within the original Project site or the surrounding one-mile buffer. 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. Dudek sent outreach letters to all Native American group representatives included on the NAHC contact list. The Rincon Band of Luiseño Indians responded stating the original Project site is located within the Band's specific Area of Historic Interest, and requests a survey of the property, a professional tribal monitor during the survey, a copy of the final study for review and comment, and request for further consultation with the City. The second response is from the Viejas Band of Kumeyaay Indians, stating the original Project site has cultural significance or ties to the Kumeyaay Nation and recommends notifying the San Pasqual Band of Mission Indians, requests all CEQA, National Environmental Policy Act, and Native American Graves Protection and Repatriation Act regulations be followed, and requests immediate contact of San Pasqual Band of Mission Indians on any changes or inadvertent discoveries. Two San Pasqual Band representatives were included in Dudek's Native American outreach but no responses were received.

In compliance with Assembly Bill 52 and Senate Bill 18, the City, as lead agency, is responsible for conducting government to government consultation with pertinent tribal entities. During consultation, Cheryl Madrigal, Tribal Historic Preservation Officer for Rincon Band, shared concerns with the City that the original Project site might have been a prehistoric meeting location (Dudek 2022). Ms. Madrigal, Dudek representatives, and City representatives met on the original Project site, including the Vernal Pool Impact Minimization Plan APE, on July 12, 2022. They discussed the Project details and Ms. Madrigal stated that she would share her recommendations with the City via email. The City also negotiated and agreed with Tribal representative to mitigation measures to protect unknown TCRs that may be buried within the original Project site.

Dudek archaeologist conducted a pedestrian survey of the original Project site on March 23, 2021 (DeCarlo 2022). The original Project site was undeveloped but surrounded by numerous industrial buildings. Portions of the original Project site have been previously disturbed, as evidenced by the presence of several dirt roads with deep ruts and numerous well-worn foot paths. The pedestrian survey did not identify any cultural resources within the original Project site; thus, no cultural resources were identified within the Vernal Pool Impact Minimization Plan APE.

Management Considerations

Dudek's cultural resources inventory for the Project did not identify any cultural resources within the original Project site, thus, no cultural resources were identified in the reduced Vernal Pool Impact Minimization Plan APE. Neither the original Project site nor the Vernal Pool Impact Minimization Plan APE pose the potential to impact known cultural resources. However, following Native American consultation pursuant to Assembly Bill 52 and Senate Bill 18, the City negotiated mitigation measures with consulting tribes to assure identification and appropriate handling of potentially buried Tribal Cultural Resources (TCR) within the original Project site. As the proposed Vernal Pool Impact Minimization Plan APE proposes less land development than does the original Project site, the Vernal Pool

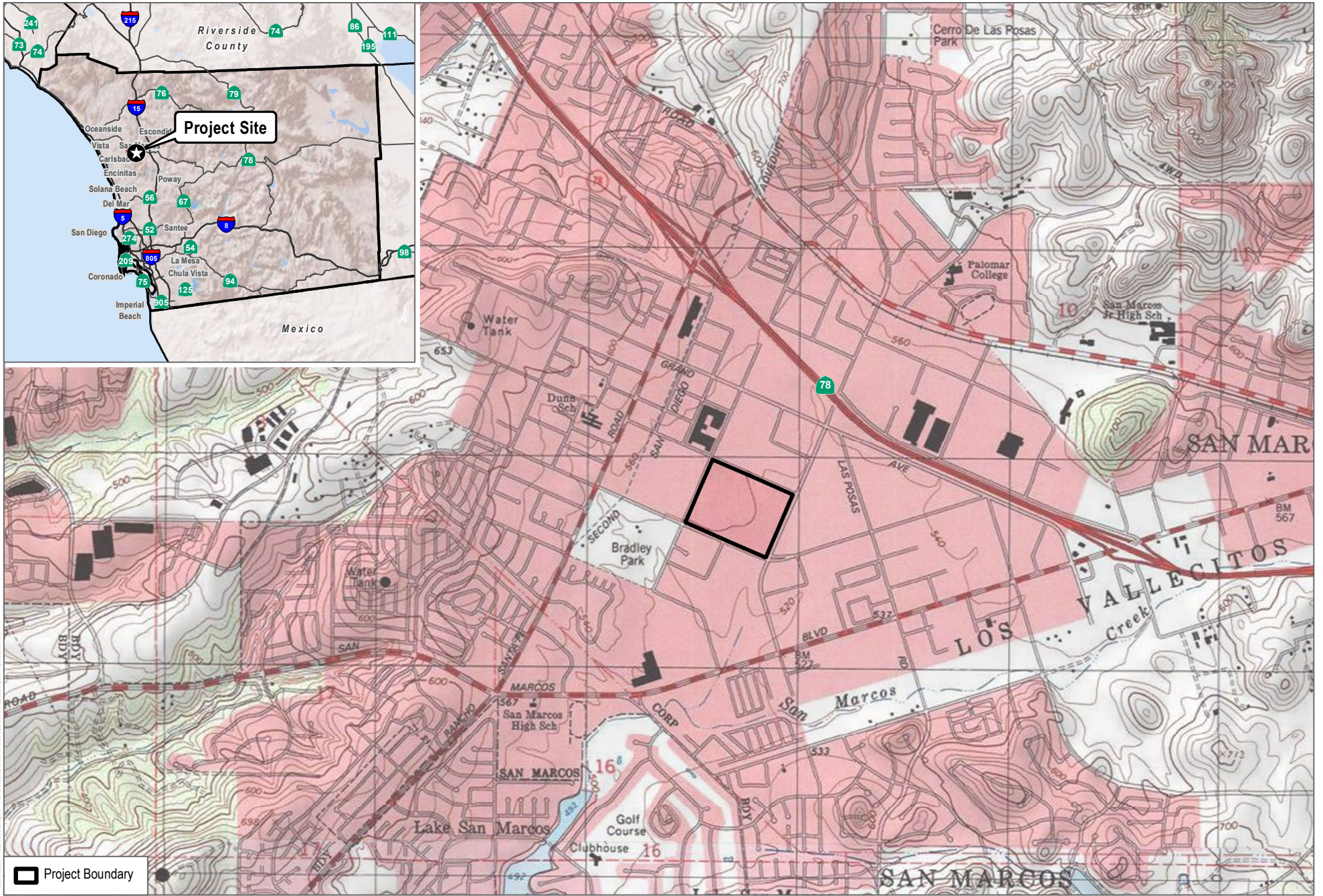
Memorandum

*Cultural Resources Impacts for the Reduced Development Footprint Alternative – Vernal Pool Impact
Minimization Plan for the Pacific Specific Plan Project*

Impact Minimization Plan APE has a reduced potential of impacting TCRs that may be buried within the Vernal Pool Impact Minimization Plan APE. The mitigation measures developed for the original Project site are sufficient for the reduced Vernal Pool Impact Minimization Plan APE.

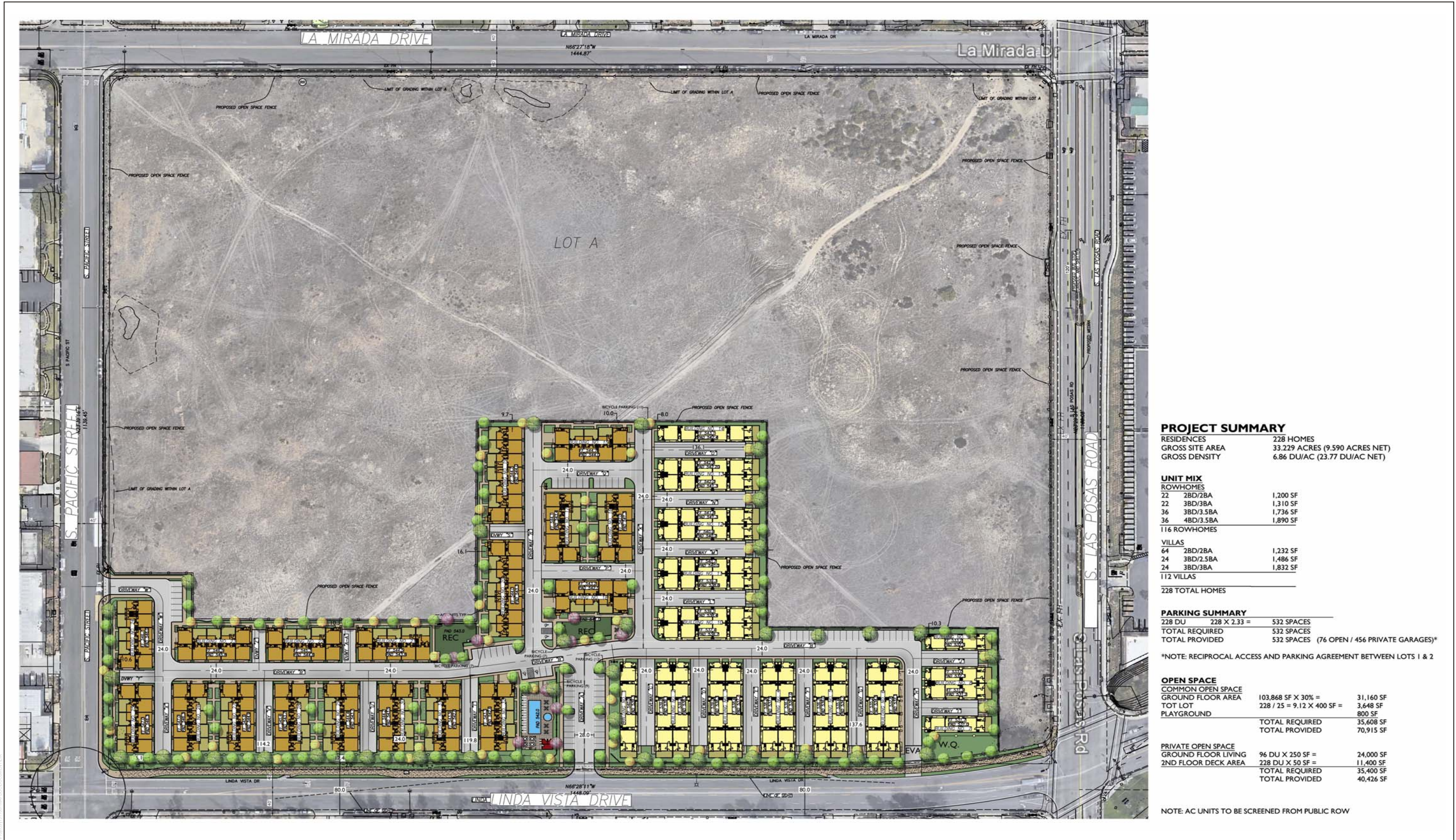
References

DeCarlo, M. 2022. *Cultural Resource Inventory Report for the Pacific GPA/Rezone Project, City of San Marcos, California.*



SOURCE: USGS 7.5-Minute Serues San Marcos Quadrangle

FIGURE 1
 Project Location
 Pacific GPA/Rezone EIR



PROJECT SUMMARY

RESIDENCES	228 HOMES
GROSS SITE AREA	33.229 ACRES (9.590 ACRES NET)
GROSS DENSITY	6.86 DU/AC (23.77 DU/AC NET)

UNIT MIX

ROWHOMES	
22	2BD/2BA 1,200 SF
22	3BD/3BA 1,310 SF
36	3BD/3.5BA 1,736 SF
36	4BD/3.5BA 1,890 SF
116 ROWHOMES	

VILLAS

64	2BD/2BA 1,232 SF
24	3BD/2.5BA 1,486 SF
24	3BD/3BA 1,832 SF
112 VILLAS	

228 TOTAL HOMES

PARKING SUMMARY

228 DU	228 X 2.33 =	532 SPACES
TOTAL REQUIRED		532 SPACES
TOTAL PROVIDED		532 SPACES (76 OPEN / 456 PRIVATE GARAGES)*

*NOTE: RECIPROCAL ACCESS AND PARKING AGREEMENT BETWEEN LOTS 1 & 2

OPEN SPACE

COMMON OPEN SPACE		
GROUND FLOOR AREA	103,868 SF X 30% =	31,160 SF
TOT LOT	228 / 25 = 9.12 X 400 SF =	3,648 SF
PLAYGROUND		800 SF
TOTAL REQUIRED		35,608 SF
TOTAL PROVIDED		70,915 SF

PRIVATE OPEN SPACE

GROUND FLOOR LIVING	96 DU X 250 SF =	24,000 SF
2ND FLOOR DECK AREA	228 DU X 50 SF =	11,400 SF
TOTAL REQUIRED		35,400 SF
TOTAL PROVIDED		40,426 SF

NOTE: AC UNITS TO BE SCREENED FROM PUBLIC ROW

SOURCE: Summa Architecture, 2024

