Appendix D
Cultural Resources Report

Cultural Resources Technical Report

Fenton Parkway Bridge Project

APRIL 2024

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Summary of Findings

This report presents the results of Dudek's cultural resources study for the Fenton Parkway Bridge Project (proposed project). The proposed project would span the San Diego River connect Fenton Parkway with Camino Del Rio North in the City of San Diego, in the Mission Valley community of the City of San Diego (City). The proposed project is referenced in the Mission Valley Community Plan (adopted by the City in 2019) and is a long-sought infrastructure enhancement in the Mission Valley community that would connect residents and businesses south of the San Diego River to land uses north of the river off Friars Road, including the Mission Valley site development, which was approved by the Board of Trustees of the California State University (CSU) in 2020 (City of San Diego 2019). The project would involve construction of a vehicular and pedestrian bridge spanning the San Diego River from north to south.

San Diego State University (SDSU) contracted Dudek to initiate the processing of an environmental impact report (EIR) in preparation for the proposed project. As a requirement of the EIR, Dudek has completed this cultural resources inventory for the proposed project. The proposed project's area of potential effect (APE) encompasses the footprint of the proposed bridge, the proposed relocated storm drains, temporary work areas, and staging areas. The proposed project is located in unsectioned land of the La Jolla and La Mesa USGS topographic maps 7.5-minute quadrangle.

Dudek conducted a records search at the South Coastal Information Center (SCIC) for the proposed project area and a surrounding 1-mile buffer on March 15, 2023. The SCIC records search identified 98 cultural resource studies that have been previously conducted within one mile of the proposed project APE (Confidential Appendix A). Of these previous studies, 16 intersected the proposed project APE. The records search did not identify any resources within the Project area; however, 60 cultural resources were identified within one mile of the proposed project APE.

The results of the Native American Heritage Commission (NAHC) search of the Sacred Lands File were positive, indicating that Native American resources have been reported within one mile of the proposed project APE. Dudek sent outreach letters via certified mail to all representatives on the NAHC list on April 28, 2023. To date, Dudek has received one written response from the outreach letters. On May 2, 2023, the Viejas Band of Kumeyaay Indians responded via-email and determined that cultural resources have been located within or adjacent to the proposed project APE and therefore recommended a Kumeyaay Cultural Monitor be on site for ground disturbing activities and to inform Viejas on new discoveries involving cultural artifacts, cremation, or human remains. Additional responses were received from Campo Band of Mission Indians and San Pasqual Band of Mission Indians requesting consultation.

In accordance with Assembly Bill (AB) 52 under CEQA, the lead agency must consult with Native American Tribes. Via certified mail, SDSU sent outreach letters to their distribution list of concerned Native American representatives on May 22, 2023. Two Native American organizations scheduled an AB 52 consultation meeting with SDSU. Campo Kumeyaay Nation representatives met with SDSU on June 21, 2023, to consult on the project. Campo requested to provide monitors during project clearing and excavation. SDSU incorporated the request into the project Draft EIR. Representatives from San Pasqual Band of Mission Indians met with SDSU on March 18, 2024, and recommended that Native American monitoring be shared on a rotational schedule through Kumeyaay Cultural Repatriation Committee. SDSU and San Pasqual agreed that this meeting satisfied and concluded AB 52 consultation.

A Dudek archaeologist and a Kumeyaay Native American monitor conducted an intensive pedestrian cultural survey of the proposed project APE. The approximately 1.1-acre northern portion of the proposed bridge footprint of the project APE has been graded and completely disturbed. The survey team tried to survey moving south of the graded area, along the but found that the remainder of the proposed bridge footprint was covered by dense vegetation surrounding the San Diego River corridor. This area was not traversable. Due to the dense vegetation, it is unlikely that a pedestrian survey would have identified any cultural resources within the bridge footprint The southern temporary staging area, however, was traversable and the survey team completed the pedestrian survey. Though traversable, this area was also heavily vegetated with poor ground visibility. No cultural resources were identified within the proposed project APE.

Though no cultural resources were identified during the records search or pedestrian survey, the proposed project APE falls within the culturally sensitive San Diego River corridor. The prehistoric Kumeyaay trail system extended along the San Diego River corridor and village sites were often located where trails meet along the river. Also, previous projects immediately adjacent to the APE have identified highly sensitive prehistoric archaeological materials and tribal cultural resources within eroded soils from previous San Diego River flood events. In addition, the Kumeyaay have recommended the need for monitoring of ground disturbing activities due to the presence of cultural resources within or adjacent to the proposed project APE. This cultural sensitivity combined with the survey team's inability to survey the densely vegetated San Diego River corridor suggests an increased potential that project construction will encounter previously unidentified cultural materials. As such, Dudek recommends archaeological and Native American monitoring during initial project ground disturbance activities.

1 Introduction

The proposed Fenton Parkway Bridge Project (proposed project) would connect Fenton Parkway, which currently terminates north of the river channel, with Camino del Rio North, south of the river channel. The Fenton Parkway bridge (bridge) would span the San Diego River (river) in the Mission Valley community of the City of San Diego (City). San Diego State University (SDSU) contracted Dudek to initiate the processing of an environmental impact report (EIR) in preparation for the proposed project. The Board of Trustees of the California State University (CSU), which is the State of California acting in its higher education capacity, on behalf of SDSU, is the lead agency responsible for certifying the adequacy and completeness of the EIR. As a requirement of the EIR, Dudek has completed this cultural resources inventory for the proposed project. This inventory reviewed all archaeological, built environment, and tribal cultural resources within 1 mile of the proposed project APE.

1.1 Regional and Local Setting

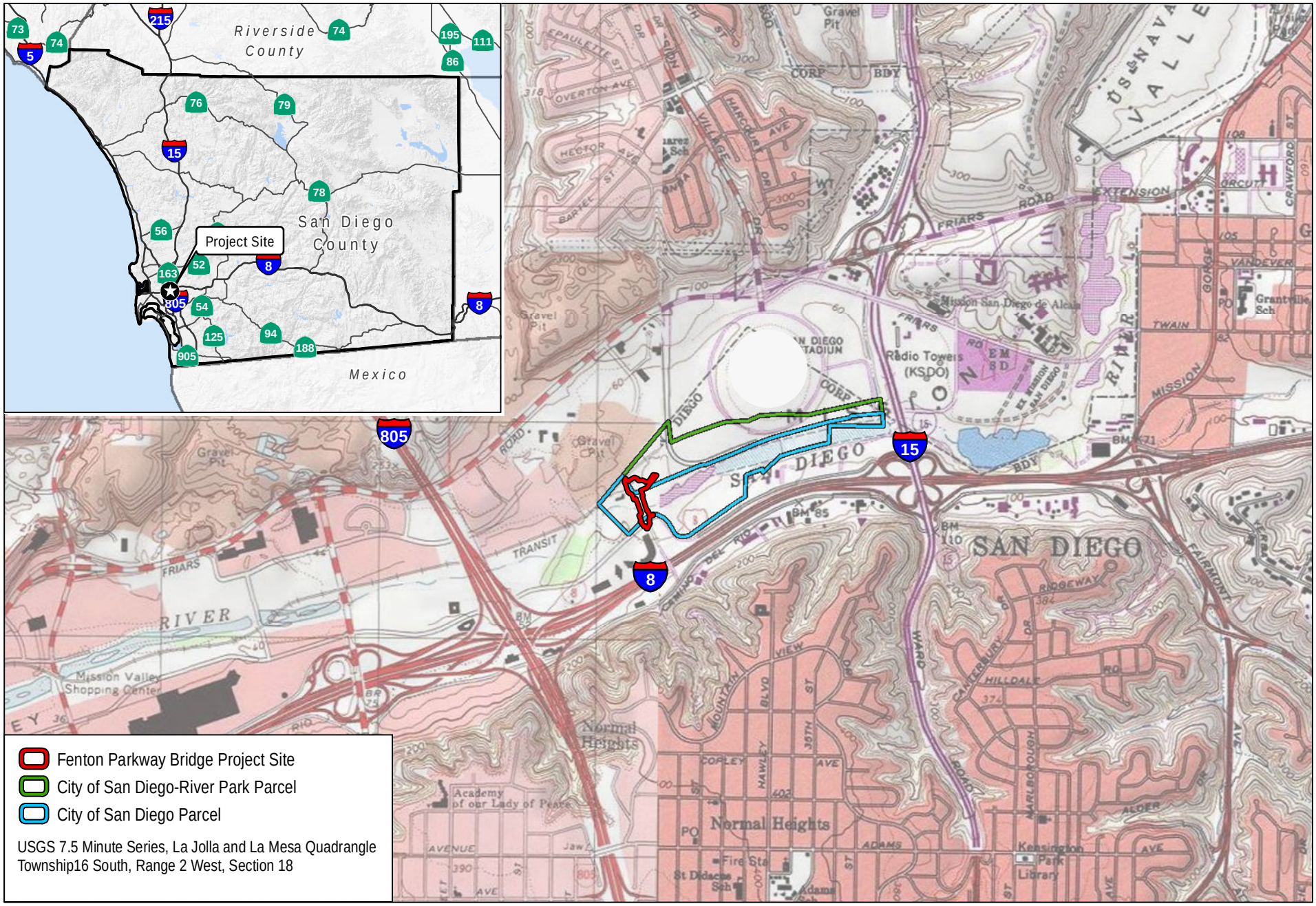
The location of the proposed bridge (project site) is in the northeast portion of the Mission Valley Community, in the central portion of the City of San Diego metropolitan area (Figure 1, Project Location). The project site is situated south of Fenton Parkway and the Fenton Marketplace and north of Camino Del Rio North and would connect these two roadways. The San Diego River bisects the project site from east to west. Surrounding uses include commercial and residential uses to the north, SDSU Mission Valley (including Snapdragon Stadium) to the northeast, office and healthcare uses to the south, and open space, including the San Diego River. The bridge would be located within and adjacent to the City of San Diego's Multi-Habitat Planning Area (MHPA) as well as the City's Stadium Mitigation Site.

The project site is surrounded by four major freeways—I-15, I-8, I-805, and State Route 163—accessed via Friars Road. The existing Metropolitan Transit System (MTS) Trolley Green Line and MTS Stadium Trolley Station are located on the north bank of the San Diego River, northwest of the project site, as shown in Figure 1. The proposed project is located in unsectioned land of the La Jolla and La Mesa USGS topographic maps 7.5-minute quadrangles.

1.2 Project Description

The proposed project would involve construction of a vehicular and bicycle/pedestrian bridge spanning the San Diego River from north to south. The design and construction of the approach roadways and bridge would comply with applicable City, County of San Diego, and California Department of Transportation (Caltrans) design standards, as well as American Association of State Highway and Transportation Officials guidelines. The proposed design for the bridge is a conventional post-tensioned, trapezoidal, concrete box girder structure. The bridge would be approximately 450 feet long, 58 feet wide, and 7 feet, 6 inches deep, and would consist of up to four spans. The spans would be supported on concrete seat-type abutments in the river embankments at each end and two to three piers within the river channel, each consisting of approximately 20-foot-tall, 6-foot-diameter circular concrete columns. The proposed project also includes relocation and/or extension of an existing 96-inch reinforced concrete pipe storm drain on the north side of the proposed bridge and a 54-inch storm drain along the proposed southern terminus of the bridge at Camino Del Rio North, both of which discharge directly into the San Diego River. The intersection of Fenton Parkway and River Park Road and the intersection of Mission City Parkway and Camino Del Rio North would also require updates.

The proposed project's area of potential effect (APE) encompasses the footprint of the bridge, the storm drains, and all temporary work and staging areas (Figure 2, Area of Potential Effect Map). The APE is predominantly covered by vegetation within the San Diego River Corridor, although the northern portion of the APE is completely graded.



SOURCE: USGS; BOWMAN/PDC 5/08/2023

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FIGURE 1

Project Location

Fenton Parkway Bridge Project

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SOURCE: BING MAPPING SERVICE; BOWMAN/PDC 5/08/2023

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FIGURE 2

Project APE Map

Fenton Parkway Bridge Project

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2 Methodology

The following section provides a description of methods employed to conduct the current cultural inventory.

2.1 Records Search Methods

Dudek conducted a records search at the South Coastal Information Center (SCIC) for the proposed project APE and a surrounding 1-mile radius on March 15, 2023. The records search included review of mapped prehistoric, historical and built-environment resources, Department of Parks and Recreation (DPR) Site Records, technical reports, archival resources, and ethnographic references. Additional consulted sources included the California Inventory of Historical Resources/California Register of Historical Resources (CRHR) and listed Office of Historic Preservation Archaeological Determinations of Eligibility, California Points of Historical Interest, California Historical Landmarks, and California Department of Transportation (Caltrans) Bridge Survey information. Geographic information system (GIS) maps were produced indicating the spatial relationship between known resources and possible project impacts. Historical aerial maps were also consulted using the internet database Historicaerials.com. These maps were used to determine the development history of the area and to indicate any possible development from the historic era that could be encountered during the survey.

2.2 Field Methods

Dudek archaeologists, Matthew DeCarlo, RPA and Javier Hernandez, conducted an intensive pedestrian cultural resources survey of the proposed project APE on May 26 and June 30, 2023. Native American monitor, Anthony LaChappa, from Redtail Environmental participated in the pedestrian survey. The survey and all personnel exceeded the applicable Secretary of Interior Professional Qualifications Standards for archaeological survey and evaluation.

The majority of the proposed project APE is covered by dense vegetation within the San Diego River corridor. The survey team walked the periphery of the dense vegetation within the APE. The approximately 1.1 acre northern portion of the APE, however, has been completely graded and the ground visibility was 100 percent. When possible, surveyors utilized transects spaced no more than 15 meters apart. When standardized transects were not possible due to dense vegetation, visual survey was utilized to search for exposed ground surfaces. The archaeologist used an Apple 3rd Generation iPAD equipped with an 8 MP resolution camera, Global Positioning System (GPS) receiver, and georeferenced PDF maps to ensure accurate survey of the proposed project APE. Accuracy of the GPS receiver ranged between 3 meters and 10 meters. The archaeologist inspected natural and artificial erosion exposures, as well as spoils from rodent burrows as a means to locate evidence for buried cultural deposits. No artifact collection was anticipated during the survey.

2.3 Native American Correspondence

In *EPIC v. Johnson* (1985) 170 Cal.App. 3rd 604*,* the Court of Appeal held that the Native American Heritage Commission (NAHC), as a state agency with special expertise on tribal history, has jurisdiction over Native American resources that may be affected by proposed projects, including Native American burial sites and archaeological places of religious significance to Native Americans. On behalf of SDSU, Dudek requested a search of the NAHC Sacred Land File on March 13, 2023, to determine if any tribal cultural resources are present within 1 mile of the

proposed project area. Pricilla Torres-Fuentes, NAHC Cultural Resources Analyst, facilitated this search and returned the results on March 28, 2023. The results of the Sacred Lands File search are discussed in Section 3.5 of this document. As part of the consultation process, the NAHC provided a list of tribal governments and individuals that should be consulted. Dudek sent outreach letters via certified mail to all representatives listed on the NAHC list on April 28, 2023. To date, Dudek has received only one response from the outreach letters.

3 Existing Conditions

This section describes the existing conditions in the proposed project area and identifies the resources that could be affected by the proposed project.

3.1 Existing Environmental Setting

Land uses adjacent to the proposed project site consist of commercial development, I-8 to the south; Friars Road, MTS Stadium Trolley Station; residential development; the retail/commercial development within Fenton Marketplace to the north; and development of SDSU Mission Valley to the east.

The elevation of the proposed project area is 35 feet above mean sea level. The proposed project APE is dominated by dense vegetation surrounding the San Diego River corridor. The northern portion of the proposed project APE, however, has been graded. Though ground surface is visible in these graded areas, there is evidence of earthmoving which would have removed any resources that may have been present.

3.2 Regulatory Setting

This section describes the applicable regulatory plans, policies, and ordinances for the proposed project.

3.2.1 State

3.2.1.1 California Environmental Quality Act

CEQA requires that all private and public activities not specifically exempted be evaluated for their potential to cause environmental impacts, including impacts to historical resources. Historical resources are recognized as part of the environment under CEQA, which defines historical resources as, but 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" (Public Resources Code, Section 5020.1[j]).

As described further below, the following CEQA statutes and CEQA Guidelines are relevant to the analysis of archaeological, tribal cultural, 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): Defines 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 21074(a): defines "tribal cultural resources" and Section 21074(b): defines a "cultural landscape."

4. California Public Resources Code section 5097.98 and CEQA Guidelines Section 15064.5(e): These statutes set forth standards and steps to be employed following the inadvertent discovery of human remains in any location other than a dedicated ceremony.
5. California Public Resources Code Sections 21083.2(b)-(c) and CEQA Guidelines Section 15126.4(b): These statutes and regulations provide information regarding the mitigation framework for archaeological and historic resources, including options of preservation-in-place mitigation measures; identifies preservation-in-place as the preferred manner of mitigating impacts to significant archaeological sites.

Under CEQA, a project may have a significant effect on the environment if it may cause "a substantial adverse change in the significance of an historical resource" (California Public Resources Code Section 21084.1; CEQA Guidelines Section 15064.5(b)). An "historical resource" is any site listed or eligible for listing in the CRHR. The CRHR listing criteria are intended to examine whether the resource in question: (a) is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage; (b) is associated with the lives of persons important in our past; (c) 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; or (d) has yielded, or may be likely to yield, information important in pre-history or history.

The term "historical resource" also includes any site described 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(g)).

CEQA also applies to "unique archaeological resources." California Public Resources Code Section 21083.2(g) defines a "unique archaeological resource" as any archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

In 2014, CEQA was amended through the passage of Assembly Bill 52 (AB 52) to apply to tribal cultural resources as well. Specifically, California Public Resources Code Section 21074 provides guidance for defining tribal cultural resources as either of the following:

1. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
    a. Included or determined to be eligible for inclusion in the California Register of Historical Resources.
    b. Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.
    a. A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

All historical resources and unique archaeological resources – as defined by statute – are presumed to be historically or culturally significant for purposes of CEQA (California Public Resources Code Section 21084.1; CEQA Guidelines Section 15064.5(a)). The lead agency is not precluded from determining that a resource is a historical resource even if it does not fall within this presumption (California Public Resources Code Section 21084.1; CEQA Guidelines Section 15064.5(a)). A site or resource that does not meet the definition of "historical resource" or "unique archaeological resource" is not considered significant under CEQA and need not be analyzed further (California Public Resources Code Section 21083.2(a); CEQA Guidelines Section 15064.5(c)(4)).

Guidelines for Determining Significance

Under CEQA, a significant cultural impact results from a "substantial adverse change in the significance of an historical resource [including a unique archaeological resource]" due to the "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired" (CEQA Guidelines Section 15064.5(b)(1); California Public Resources Code Section 5020.1(q)). In turn, the significance of a historical resource is materially impaired when a project:

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

(CEQA Guidelines Section 15064.5(b)(2)).

Pursuant to these sections, CEQA first evaluates whether a project site contains any "historical resources," then assesses whether that project will cause a substantial adverse change in the significance of a historical resource such that the resource's historical significance is materially impaired.

When a project significantly affects a unique archeological resource, CEQA imposes special mitigation requirements. Specifically:

> If it can be demonstrated that a project will cause damage to a unique archeological resource, the lead agency may require reasonable efforts to be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. Examples of that treatment, in no order of preference, may include, but are not limited to, any of the following:
>
> 1. Planning construction to avoid archeological sites.
> 2. Deeding archeological sites into permanent conservation easements.
> 3. Capping or covering archeological sites with a layer of soil before building on the sites.
> 4. Planning parks, greenspace, or other open space to incorporate archeological sites.

(California Public Resources Code Section 21083.2(b)(1)-(4).)

If these "preservation in place" options are not feasible, mitigation may be accomplished through data recovery (California Public Resources Code Section 21083.2(d); CEQA Guidelines Section 15126.4(b)(3)(C)). California Public Resources Code Section 21083.2(d) states that "[e]xcavation as mitigation shall be restricted to those parts of the unique archeological resource that would be damaged or destroyed by the project. Excavation as mitigation shall not be required for a unique archeological resource if the lead agency determines that testing or studies already completed have adequately recovered the scientifically consequential information from and about the resource, if this determination is documented in the environmental impact report."

These same requirements are set forth in slightly greater detail in CEQA Guidelines Section 15126.4(b)(3), as follows:

A. Preservation in place is the preferred manner of mitigating impacts to archeological sites. Preservation in place maintains the relationship between artifacts and the archeological context. Preservation may also avoid conflict with religious or cultural values of groups associated with the site.
B. Preservation in place may be accomplished by, but is not limited to, the following:
    1. Planning construction to avoid archeological sites;
    2. Incorporation of sites within parks, greenspace, or other open space;
    3. Covering the archeological sites with a layer of chemically stable soil before building tennis courts, parking lots, or similar facilities on the site[; and]
    4. Deeding the site into a permanent conservation easement.
C. When data recovery through excavation is the only feasible mitigation, a data recovery plan, which makes provision for adequately recovering the scientifically consequential information from and about the historical resource, shall be prepared and adopted prior to any excavation being undertaken.

Note that, when conducting data recovery, "[i]f an artifact must be removed during project excavation or testing, curation may be an appropriate mitigation" (CEQA Guidelines Section 15126.4(b)(3)(C)). However, "[d]ata recovery shall not be required for an historical resource if the lead agency determines that testing or studies already completed have adequately recovered the scientifically consequential information from and about the archeological or historic resource, provided that determination is documented in the EIR and that the studies are deposited with the California Historical Resources Regional Information Center" (CEQA Guidelines section 15126.4(b)(3)(D)).

Protections for Human Remains

CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. If Native American human remains or related cultural material are encountered, Section 15064.5(e) of the CEQA Guidelines (as incorporated from California Public Resources Code Section 5097.98) and Health and Safety Code Section 7050.5 define the subsequent protocol. In the event of the accidental discovery or recognition of any human remains, excavation or other disturbances shall be suspended of the site or any nearby area reasonably suspected to overlie adjacent human remains or related material. Protocol requires that a county-approved coroner be contacted in order to determine if the remains are of Native American origin. Should the coroner determine the remains to be Native American, the coroner must contact the NAHC within 24 hours. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating, with appropriate dignity, the human remains and any

associated grave goods as provided in California Public Resources Code Section 5097.98 (California Code of Regulations, Title 14; Chapter 3; Article 5; Section 15064.5(e)).

3.3 Cultural Context

Available evidence indicates that 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 timeframe 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 B.C.), Archaic (8000 B.C.–A.D. 500), Late Prehistoric (A.D. 500–1750), and Ethnohistoric (post-AD 1750). As recognized by State Assembly Joint Resolution No. 60 (2001), the Kumeyaay Nation has occupied the southern California and Baja California region, including the City of San Diego's jurisdictional boundaries and the proposed project's APE, far into antiquity. Should any Native American human remains be found in the City's jurisdictional boundaries, the NAHC is expected to designate a Most Likely Descendant from the Kumeyaay Nation. It is important to note that Kumeyaay aboriginal lifeways did not cease within San Diego County and Baja California at European contact. Protohistoric refers to the chronological trend of continued Native American aboriginal lifeways at the cusp of the recorded historic period in the Americas.

3.3.1 Paleoindian (pre-5500 B.C.)

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 1984). 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 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-7,500 B.P.) 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-8,000 B.P.) that are commonly found at sites in California's high desert (Basgall

and Hall 1990). CA-SDI-210 yielded one corrected radiocarbon date of 8,520–9,520 B.P. (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 8,200 B.C. (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).

3.3.2 Archaic (8000 B.C.–A.D. 500)

The more than 1,500-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 A.D. 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.

3.3.3 Late Prehistoric (A.D. 500–1750)

The period of time following the Archaic and prior to Ethnohistoric times (A.D. 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-A.D. 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 A.D. 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 A.D. 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 A.D. 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 A.D. 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 A.D. 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.

3.3.4 Ethnohistoric (post-A.D. 1750)

As recognized by State Assembly Joint Resolution No. 60 (2001), the Kumeyaay Nation has occupied the southern California and Baja California region, including the City of San Diego's jurisdictional boundaries and the proposed project's APE, far into antiquity. The history of the Kumeyaay 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 onthe divide separating Valley Center from Escondido and then up along Bear Ridge to the 2,240 contour line and then north across the divide between Valley Center and Woods Valley up to the 1,880-foot peak, then curving around east along the divide above Woods Valley. [1993, as 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). Ipai and Tipai, spoken respectively by the northern and southern Kumeyaay communities, are mutually intelligible. For this reason, these two are often treated as dialects of a larger Kumeyaay tribal group rather than as distinctive languages, though this has been debated (Luomala 1978; Laylander 2010).

Victor Golla has contended that one can interpret the amount of variability within specific language groups as being associated with the relative "time depth" of the speaking populations (Golla 2007, p. 80) A large amount of variation within the language of a group represents a greater time depth than a group's language with less internal diversity. One method that he has employed is by drawing comparisons with historically documented changes in Germanic

and Romantic language groups. Golla has observed that the "absolute chronology of the internal diversification within a language family" can be correlated with archaeological dates (2007, p. 71). This type of interpretation is modeled on concepts of genetic drift and gene flows that are associated with migration and population isolation in the biological sciences.

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

The Kumeyaay generally lived in smaller family subgroups that would inhabit two or more locations over the course of the year. While less common, there is sufficient evidence that there were also permanently occupied villages, and that some members may have remained at these locations throughout the year (Owen 1965; Shipek 1982, 1985; Spier 1923). The prehistoric village of *Nipawai/Nipaguay was located at the bend in the San Diego River where Kumeyaay occupants could utilize the riverine resources and dam channels to redirect water to facilitate plant husbandry (Shipek 1993). As its epicenter is located only 0.5 miles east, there is an increased probability that cultural resources identified within the proposed project APE would be associated with Nipawai/Nipaguay*. 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. Should any Native American human remains be found in the City of San Diego's jurisdictional boundaries, including the proposed project's APE, the NAHC is expected to designate a Most Likely Descendant from the Kumeyaay Nation. 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 may 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 would have procured shellfish from three primary environments, including the sandy open coast, bay and lagoon, and rocky open coast (Luomala 1978). 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* sp., *Saxidomus* spp., *Tivela* spp., and others. Rocky coast shellfish dietary contributions consisted of *Pseudochama sp.*, *Megastraea* spp., *Saxidomus* spp., *Protothaca* spp., *Megathura* spp., and others. Lastly, the bay environment in the immediate vicinity of the project area would have provided *Argopecten* spp., *Chione* spp., *Ostrea* spp., *Neverita* spp., *Macoma* spp., *Tagelus* spp., 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* spp.), 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 may 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* spp.), sage (*Salvia* spp.), *Ephedra*, prickly pear (*Opuntia* spp.), mulefat (*Baccharis salicifolia*), chamise (*Adenostoma fasciculatum*), elderberry (*Sambucus nigra*), oak (*Quercus* spp.), willow (Salix spp.), and *Juncus* grass among many others (Wilken 2012).

The Kumeyaay territory expanse over several distinct ecological zones and intra-tribal trade allowed the dispersal of goods and information. The Kumeyaay usually trade between bands more often than they traded with unrelated groups outside of their territory, however, larger trail systems crossed their land from the Lower Colorado River to the Southern Californian coast (Luomala 1978). The coastal Kumeyaay exchanged a number of local goods, such as seafood, coastal plants, and various types of shell for items including acorns, agave, mesquite beans, gourds, and other more interior plants of use (Luomala 1978). Trade routes were often along trails between villages, along waterways such as the San Diego River, or, in desert terrain, between springs and water catchments (Heizer 1978). Spaniards marveled at how quickly news and goods travelled between the Colorado River and the coast along the Kumeyaay trail system (Heizer 1978). The routes of the Kumeyaay trail system were followed by wagon routes and later became major thoroughfares (Davis 1961). Interstate 8 is today aptly named the “Kumeyaay Highway” as it follows the likely path of the prehistoric trail connecting coastal and inland Kumeyaay. The proposed project APE is located along the Kumeyaay Highway and the San Diego River between the prehistoric villages of *Kosoi/Kosay/Kosaii/Cosoy/Kosa’aay* and *Nipawai/Nipaguay*, the location of the Old Town Presidio (4 miles west) and the Mission San Diego de Alcalá (.5 miles east), respectively (Kroeber 1925).

3.3.5 The Historic Period (post-A.D. 1542)

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

Spanish colonial settlement was initiated in 1769, when multiple expeditions arrived in San Diego by land and sea, and then continued northward through the coastal plain toward Monterey. A military presidio and a mission were soon firmly established at San Diego, despite violent resistance to them from a coalition of local Kumeyaay native communities. In 1774, the Spanish missionaries reestablished the Mission of San Diego de Alcalá up the San Diego River to its current location in Mission Valley in order to be closer to a more reliable water source (Hill 2002). The Mission of San Diego de Alcalá was built at the location of the ethnohistoric Kumeyaay village of *Nipawai/Nipaguay,* located a half-mile west of the proposed project APE. The missionaries relied heavily on Kumeyaay labor and resources extracted from Nipawai/Nipaguay. 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.

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

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

Alonzo Horton's development of a New San Diego (modern downtown) in 1867 began to swing the community focus away from Old Town and began the urbanization of San Diego. Expansion of trade brought an increase in the availability of building materials. Wood buildings gradually replaced adobe structures. Development spread from downtown based on a variety of factors, including the availability of potable water and transportation corridors. During the Victorian Era of the late 1800s and early 1900s, the areas of Golden Hill, Uptown, Banker's Hill, and Sherman Heights were developed.

San Diego State University was established in 1897 as a normal school located on Normal Street. The institution moved to its current site in the college area in 1931. Development of the state college area began then and the development of the Navajo community was outgrowth from the college area from the west. There was farming and ranching in Mission Valley until the middle portion of the twentieth century, when the uses were converted to commercial and residential. There were dairy farms and chicken ranches adjacent to the San Diego River where now there are motels, restaurants, office complexes and regional shopping malls. There was little development north of the San Diego River until Linda Vista was developed as military housing in the 1940s. The federal government improved public facilities and extended water and sewer pipelines to the area. From Linda Vista, development spread north of Mission Valley to the Clairemont Mesa and Kearny Mesa areas. Development in these communities was mixed use and residential on moderate size lots.

3.4 Archaeological Inventory

3.4.1 Previously Conducted Cultural Resources Studies

The SCIC records search identified 99 cultural resource studies have been previously conducted within 1-mile of the proposed project APE (Confidential Appendix A). Of these previous studies, 17 intersected the APE (Table 1). The studies included records searches, surveys, and monitoring reports for the San Diego River corridor and stadium grounds. These previous studies did not identify any resources within the APE.

Table 1. Previously Conducted Cultural Studies within Proposed Project APE

Report No.	Year	Publisher	Title
SD-00546	1975	Sue Ann Cupples	An Archaeological Survey of the San Diego River Valley
SD-00789	1988	Westec Services, Inc.	Archaeological Survey of The North Mission Valley Interceptor Sewer, Stadium Way to Fairmont Avenue
SD-02628	1990	ERCE	Historic Properties Inventory Report for the Mission Valley Water Reclamation Project, San Diego California
SD-09748	2005	ASM Affiliates	Archaeological Monitoring for the San Diego River Wetland Creation Project-Phase A, City of San Diego, California Pts #6020, Ldr 42-0077 (Jo#008212)
SD-11826	2008	Affinis	Archaeological Resources Analysis for the Master Stormwater System Maintenance Program, San Diego, California Project. No. 42891
SD-12200	2009	City Of San Diego Development Services Department	Draft Environmental Impact Report for the Master Storm Water System Maintenance Program (MSWSMP)
SD-12200	2009	City Of San Diego Development Services Department	Draft Environmental Impact Report for the Master Storm Water System Maintenance Program (MSWSMP)
SD-13202	2011	ICF International	Cultural Resources Technical Assessment for the Program Environmental Impact Report for the San Diego River Park Master Plan, City of San Diego, California
SD-13918	2012	The City of San Diego	The San Diego River Park Master Plan

Table 1. Previously Conducted Cultural Studies within Proposed Project APE

Report No.	Year	Publisher	Title
SD-15086	2014	Environmental Assessment Specialists, Inc.	Direct Ape Historic Architectural Assessment for T-Mobile West, LLC Candidate Sd06193a (Sd193 Qualcomm Stadium [Jack Murphy Stadium]) 9449 Friars Road, San Diego, San Diego County, California
SD-15086	2014	Environmental Assessment Specialists, Inc.	Direct Ape Historic Architectural Assessment for T-Mobile West, LLC Candidate Sd06193a (Sd193 Qualcomm Stadium [Jack Murphy Stadium]) 9449 Friars Road, San Diego, San Diego County, California
SD-15120	2014	Atkins	Historical Resource Research Report Stadium Wetland Mitigation Project (San Diego River)
SD-15120	2014	Atkins	Historical Resource Research Report Stadium Wetland Mitigation Project (San Diego River)
SD-15756	2015	ACE Environmental	Historic Architectural Resource-Inventory and Assessment, AT&T Site Sd0588, AT&T 3c Carrier Add, Qualcomm Stadium (Das), 9949 Friars Road, San Diego, San Diego County, California 92108
SD-15758	2015	ACE Environmental	Cultural Resource Records Search and Site Survey, AT&T Site Sd0588, AT&T 3c Carrier Add, Qualcomm Stadium (Das), 9949 Friars Road, San Diego, San Diego County, California 92108
SD-16405	2015	ACE Environmental	Historic Architectural Resource-Inventory and Assessment Qualcomm Stadium Verizon Antenna Add Vzw Odas Final Design Att Asg Sd Rf 9449 Friars Road, San Diego, San Diego County, California 92108
Pending	2020	Dudek	Cultural Resources Technical Report for the SDSU Mission Valley Campus Master Plan Project

3.4.2 Previously Identified Cultural Resources

The records search did not identify any resources within the proposed project APE; however, 60 cultural resources were identified within one mile of the proposed project APE (Table 2; see also Confidential Appendix A). The prehistoric resources within one mile of the proposed project APE include one campsite, one hearth feature, one lithic scatter, and 15 isolates. Historic -period sites include 13 buildings or structures, four refuse scatters, a highway, a commercial block, an electricity transmission line, and 21 isolates. One multicomponent site, a historic-period refuse scatter with a prehistoric lithic flake, was also identified within 1 mile of the proposed project APE. The records search also identified three historic addresses without Primary numbers: Mission Cliff Gardens, 4010 Wesleyan Place, and 5007 Raymond Place.

Table 2. Previously Identified Cultural Resources within 1-Mile of the Proposed Project APE

Primary No.	Trinomial	Period	Description	Project Proximity
P-37-011056	CA-SDI-011056	Prehistoric	Campsite	Within 1-mile
P-37-014959	—	Prehistoric	Isolate: Lithic	Within 1-mile

Table 2. Previously Identified Cultural Resources within 1-Mile of the Proposed Project APE

Primary No.	Trinomial	Period	Description	Project Proximity
P-37-015723	—	Historic	Building	Within 1-mile
P-37-015724	—	Historic	Building	Within 1-mile
P-37-015725	—	Historic	Building	Within 1-mile
P-37-015726	—	Historic	Building	Within 1-mile
P-37-015727	—	Historic	Building	Within 1-mile
P-37-015781	—	Historic	Building	Within 1-mile
P-37-017509	—	Historic	Building	Within 1-mile
P-37-018407	CA-SDI-015600	Prehistoric	Lithic scatter	Within 1-mile
P-37-019000	—	Historic	Historical commercial block	Within 1-mile
P-37-024379	—	Historic	Refuse scatter	Within 1-mile
P-37-024380	—	Historic	Refuse scatter	Within 1-mile
P-37-028235	—	Historic	Building	Within 1-mile
P-37-029474	—	Historic	Building	Within 1-mile
P-37-033557	—	Historic	Highway	Within 1-mile
P-37-034761	CA-SDI-021623	Historic	Refuse scatter	Within 1-mile
P-37-035165	—	Historic	Building	Within 1-mile
P-37-035171	—	Historic	Structure: Stadium	Within 1-mile
P-37-035461	—	Historic	Building	Within 1-mile
P-37-036318	—	Historic	Building: Industrial; Structure: Utility	Within 1-mile
P-37-036319	—	Historic	Electric transmission line	Within 1-mile
P-37-038900	—	Prehistoric	Isolate: Lithic	Within 1-mile
P-37-039525	—	Prehistoric	Isolate: Lithic	Within 1-mile
P-37-039526	—	Prehistoric	Isolate: Lithic	Within 1-mile
P-37-039527	CA-SDI-23098	Prehistoric	Hearth	Within 1-mile
P-37-039845	CA-SDI-039845	Historic	Refuse scatter, cistern	Within 1-mile
P-37-039873	—	Historic	Isolate: Refuse	Within 1-mile
P-37-039874	—	Historic	Isolate: Refuse	Within 1-mile
P-37-039875	—	Prehistoric	Isolate: Lithic	Within 1-mile
P-37-039876	—	Prehistoric	Isolate: Lithic	Within 1-mile
P-37-039877	—	Prehistoric	Isolate: Lithic	Within 1-mile
P-37-039878	—	Historic	Isolate: Refuse	Within 1-mile
P-37-039879	—	Historic	Isolate: Refuse	Within 1-mile
P-37-039880	—	Prehistoric	Isolate: Lithic	Within 1-mile
P-37-039881	—	Historic	Isolate: Refuse	Within 1-mile
P-37-039882	—	Prehistoric	Isolate: Lithic	Within 1-mile
P-37-039883	—	Prehistoric	Isolate: Lithic	Within 1-mile
P-37-039884	—	Historic	Isolate: Refuse	Within 1-mile

Table 2. Previously Identified Cultural Resources within 1-Mile of the Proposed Project APE

Primary No.	Trinomial	Period	Description	Project Proximity
P-37-039885	—	Prehistoric	Isolate: Lithic	Within 1-mile
P-37-039886	—	Historic	Isolate: Refuse	Within 1-mile
P-37-039887	—	Historic	Isolate: Refuse	Within 1-mile
P-37-039888	—	Prehistoric	Isolate: Shell	Within 1-mile
P-37-039889	—	Prehistoric	Isolate: Lithic	Within 1-mile
P-37-039890	—	Prehistoric	Isolate: Lithic	Within 1-mile
P-37-039891	—	Historic	Isolate: Refuse	Within 1-mile
P-37-039892	—	Historic	Isolate: Refuse	Within 1-mile
P-37-039893	—	Historic	Isolate: Refuse	Within 1-mile
P-37-039894	—	Historic	Isolate: Refuse	Within 1-mile
P-37-039895	—	Historic	Isolate: Refuse	Within 1-mile
P-37-039896	—	Multicomponent	Historic refuse scatter; lithic flake	Within 1-mile
P-37-039897	—	Historic	Isolate: Refuse	Within 1-mile
P-37-039898	—	Historic	Isolate: Refuse	Within 1-mile
P-37-039899	—	Prehistoric	Isolate: Lithic	Within 1-mile
P-37-039900	—	Historic	Isolate: Refuse	Within 1-mile
P-37-039901	—	Historic	Isolate: Refuse	Within 1-mile
P-37-039902	—	Historic	Isolate: Refuse	Within 1-mile
P-37-039903	—	Historic	Isolate: Refuse	Within 1-mile
P-37-039904	—	Historic	Isolate: Refuse	Within 1-mile
P-37-039905	—	Historic	Isolate: Cemetery headstone	Within 1-mile

3.4.3 Aerial Photograph Analysis

Historic aerial photographs of the proposed project area were reviewed at historicaerials.com in order to assess land use and development changes over time (NETR 2023). Historic aerial photographs of the proposed project area are available since 1953. From 1953 through 1966, aerial photographs show the proposed project APE as undeveloped and dominated by the unchanneled San Diego River. By 1972, the current alignment of Camino Del Rio North was established, and the northern portion of the proposed project APE had been graded in association with development of the adjacent San Diego Stadium. The 1972 aerial photograph also shows the channelization of the San Diego River within the proposed project APE. The proposed temporary staging area south of the San Diego River was also graded and the alignments of Camino Del Rio North and Mission City Parkway were established. The proposed project APE remained unchanged until 1997 when development north of the proposed project APE prompted construction of the railway and Fenton Parkway. Aerial photographs show no change in the proposed project APE since the late 1990s.

A review of the available aerial photographs informs SDSU's understanding of the cultural resources sensitivity of the proposed project APE. The San Diego River watershed covered at least the southern half of the project APE. The San Diego River corridor was a rich resource and thoroughfare for the Kumeyaay Native American, both before and

after European contact. The prehistoric Kumeyaay trail system extended along the San Diego River corridor and village sites were often located where trails meet along the river. The previous expansion of the San Diego watershed increases the likelihood that buried archaeological resources and tribal cultural resources will be encountered throughout the project APE. The hillsides northwest of the project APE were a prime location of encampments that overlooked the river valley. This again increases the likelihood of identifying cultural resources during construction.

3.4.4 Intensive Pedestrian Survey Results

The survey team accessed the proposed project APE along its northern boundary adjacent to Fenton Parkway. This approximately 1.1 acre area has been highly disturbed and shows signs of complete grading and levelling (Exhibit 1). The survey team examined this ground within the graded area of the proposed Project APE. Ground visibility was 100 percent, and no cultural resources were identified. The team tried to survey moving south of the graded area but found that the remainder of the proposed project APE was covered by dense vegetation surrounding the San Diego River corridor (Exhibit 2). This area was not traversable. Due to the dense vegetation, it is unlikely that pedestrian survey would have recovered any cultural resources as there is zero ground visibility. The survey team attempted to access the proposed bridge footprint from the southern extent adjacent to Camino Del Rio North, but the terrain was extremely steep and densely vegetated, preventing access. The southern proposed temporary staging area was traversable but completely covered with vegetation providing low ground visibility (Exhibit 3). The pedestrian survey did not identify any cultural resources within the proposed project APE.

Exhibit 1. Northern portion of proposed project has been graded. View west.

Exhibit 2. Dense vegetation surrounding San Diego River corridor. View south from graded portion of proposed project APE.

Exhibit 3. Dense vegetation covering the southern temporary staging area. View north.

3.5 Native American Heritage Commission and Assembly Bill 52 Consultation

The results of the NAHC search of the Sacred Lands File were positive indicating that Native American resources have been reported within 1-mile of the APE. The NAHC included a list of tribal representatives who may possess tribal knowledge of the APE (Appendix B). Dudek sent outreach letters via certified mail to all representatives listed on the NAHC list on April 28, 2023. All representatives listed on the NAHC contact list received letters.

To date, Dudek has received one written response from the NAHC outreach letters. Ray Teran, Resource Manager of the Viejas Band of Kumeyaay Indians, wrote a response letter to Dudek indicating that the "project site has cultural significance or ties to Viejas." Viejas also states that cultural resources have been located within or adjacent to the proposed project APE. Mr. Teran requested that a Kumeyaay Cultural Monitor be on site during ground-disturbing activities and that the monitor inform Viejas of any inadvertent cultural discoveries of cultural artifacts, cremation sites, or human remains. Mr. Teran did not indicate the specific location of any known tribal cultural resources.

In accordance with Assembly Bill 52 under CEQA, the lead agency must consult with Native American Tribes. Via certified mail, on May 22, 2023, SDSU sent project notification letters to those on the distribution list it maintains of concerned Native American representatives. Two tribal entities responded to these letters and requested consultation: Campo Kumeyaay Nation and San Pasqual Band of Mission Indians.

SDSU representatives met with Campo representatives on June 21, 2023, to consult on the project. Campo requested to provide monitors during project clearing and excavation. SDSU incorporated the request into the project Draft EIR. SDSU sent Campo an email on March 11, 2024, stating that SDSU considers AB 52 consultation closed with Campo Kumeyaay Nation.

Representatives from San Pasqual Band of Mission Indians met with SDSU on March 18, 2024. SDSU presented project plans and San Pasqual Band representatives recommended that Native American monitoring be shared on a rotational schedule through Kumeyaay Cultural Repatriation Committee. SDSU and San Pasqual agreed that this meeting satisfied and concluded AB 52 consultation.

4 Thresholds of Significance

The following significance criteria included in Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) assist in determining the significance of a cultural resource impact. According to Appendix G, a significant impact related to cultural resources would occur if the project would:

1. Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5.
2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5.
3. Disturb any human remains, including those interred outside of dedicated cemeteries.

Likewise, the significance of impacts to tribal cultural resources must also be determined. California Public Resources Code Section 21074(a) defines tribal cultural resources as one of the following:

1. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
    a. Included or determined to be eligible for inclusion in the California Register of Historical Resources.
    b. Include in a local register of historical resources as defined in subdivision (k) of Section 5020.1.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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

The following significance criteria included in Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) assist in determining the significance of a tribal cultural resource impact. According to Appendix G of the CEQA Guidelines, a significant impact related to tribal cultural resources would cause a substantial adverse change in the significance of a tribal cultural resource, defined in California Public Resources Code Section 21074 as either a site, feature, place, 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:

1. 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
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of the Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

As described in Section 3.3, Regulatory Setting, the treatment of historic resources, if found, is governed by federal and state laws and regulations, and there are specific criteria for determining whether or not a historic resource is significant and/or protected by law. 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 criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. Is associated with the lives of persons important in our past.
3. 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.
4. Has yielded, or may be likely to yield, information important in prehistory or history.

5 Impact Analysis

5.1 Project Impacts

Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?

Construction/Temporary Impacts

Direct Impacts

No archaeological resources were identified through the SCIC records search or through intensive pedestrian survey of the area. The northern portion of the proposed project APE has been highly disturbed through grading, which was previously monitored by an archaeologist and Native American monitor. This northern portion of the proposed project APE has been substantially disturbed and is unlikely to contain intact archaeological deposits. However, the majority of the proposed project APE is undeveloped and covered by dense vegetation surrounding the San Diego River corridor. This area was not subject to intensive pedestrian survey, because the dense vegetation restricted access and ground visibility. Also, due to the proximity of the proposed project to and within the San Diego River, the Kumeyaay trail system that extended along the San Diego River corridor, and the prehistoric village of *Nipawai/Nipaguay and San Diego Mission*, there is an increased potential that buried cultural deposits are present within the proposed project area. Previous projects immediately adjacent to the current proposed project APE have identified highly sensitive prehistoric archaeological materials and tribal cultural resources within eroded soils from previous San Diego River flood events. Likewise, a response to Dudek's NAHC outreach letter stated that resources have been previously "located within or adjacent to the APE." Construction related to the proposed project may result in uncovering previously unidentified cultural resources. As such, Dudek recommends archaeological and Native American monitoring during initial ground-disturbing activities including, but not limited to, vegetation removal, drilling, and grading. Should construction or other personnel encounter any historical, archaeological, or Native American cultural material within the proposed project area, the proposed project would result in **potentially significant** impacts; therefore, mitigation is provided (see **MM-CUL-1** in Section 6, Mitigation Measures).

Indirect Impacts

No archaeological resources were identified through the SCIC records search, NAHC and tribal correspondence, or through the intensive pedestrian survey of the area. Construction activities in the area would not introduce indirect impacts to surrounding archaeological resources. Because the surrounding project area has been substantially developed, any increased vehicle and pedestrian traffic resulting from project construction would pose little risk to previously recorded archaeological resources in the project vicinity. As such, construction would **not result in significant indirect impacts** to archaeological resources.

Operational/Permanent Impacts

No archaeological resources were identified through the SCIC records search or through intensive pedestrian survey of the area. However, adjacent projects and NAHC consultation did identify the possibility that the proposed project APE may intersect previously unidentified cultural resources. Once construction is complete, operation of the project would not have a direct impact to previously identified archaeological resources since they would have been

identified and properly mitigated during initial discovery (i.e., during construction). Because the surrounding project area has been substantially developed, any increased vehicle and pedestrian traffic resulting from project operation would pose no risk of indirect impacts to adjacent archaeological resources in the project vicinity. After construction is finished, operational/permanent activities would **not result in significant impacts** to cultural resources.

Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

No historical resources were identified in the proposed project APE based on a review of the SCIC records search material, assessor records, historic aerial imagery, online research, and an intensive pedestrian survey. The APE transects a segment of the San Diego River near the area of Fenton Parkway and Northside Drive, as well as the area near Mission City Parkway and Camino Del Rio North. Although portions of the San Diego River have been engineered, the portion of the river in the proposed project APE is considered a non-engineered watercourse. As such, the embankments along the San Diego River segment in the proposed project APE are not considered components of an engineered structure or formal levee system. Consequently, the river, which is a natural watercourse, and its associated embankments are not considered built environment resources or a historical resource for the purposes of CEQA.

Additionally, research did not indicate that the river and the natural resources within the proposed project APE collectively constitute a cultural landscape or any of its sub-types—including a historic site, historic designed landscape, historic vernacular landscape, or ethnographic landscape and, therefore, the geographic area within the proposed project APE lacks sufficient significance to be considered a historical resource under CEQA. The geographic area within the proposed project APE does not qualify as a historic site because it is not a landscape that is known to have a significant association with a historic event, activity, or person. Secondly, the geographic area within the proposed project APE is not a historic designed landscape because research did not indicate that it was consciously designed and laid out by a master landscape architect or that it has a historical association with a significant person, trend, or movement in landscape architecture, or a significant relationship to the theory or practice of landscape architecture. Thirdly, the geographic area within the proposed project APE is not considered a historic vernacular landscape because the use and physical layout of this land is not known to directly reflect an endemic tradition, custom, belief, or cultural value. Finally, the geographic area within the project APE does not qualify as an ethnographic landscape because it lacks any known natural or cultural resources that associated peoples define as heritage resources.

According to the National Levee Database established by the U.S. Army Corps of Engineers (Corps), there are levees located approximately 2 miles west of the APE. One levee consists of a 460-foot-long segment of the San Diego River Levee (ID #1905037005) along the north bank of the river and another 1,040-foot levee segment of the San Diego River, South Levee (ID #1905037004), is located near Highway 163, approximately 2.15 miles west of the proposed project APE on the south bank of the river. Both levee segments were constructed by the Corps and have been maintained and operated by the City of San Diego (the local sponsor) since December 3, 1953 (U.S. Army Corps 2015). Both levees were excluded from the proposed project APE because they are too distant from the proposed construction and operation activities to be affected by the project.

Closer to the project site, all buildings at the periphery of the proposed project APE were built after 1985 and would not trigger the City of San Diego's 45-year threshold for local evaluation consideration and do not yet meet the 50-year age consideration for NRHP and CRHR evaluations (in this case 1973 or earlier) or the significance threshold for exceptional importance if less than 50 years old. The proposed project APE contains no historical

resources and therefore the project would not directly affect any such resources. Additionally, the proposed project APE contains no geographic areas of indirect effect, since there are no reasonably foreseeable project activities that would occur later in time or that would be farther removed in distance that could indirectly affect a historical resource. Finally, since the project would not cause any direct or indirect effects that would result in a substantial adverse change in the significance of a historical resource, the proposed project APE contains no areas under consideration for cumulative impacts. Overall, construction and operation of the project would result in **no impact** on historical resources and, therefore, no mitigation would be required.

Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Construction/Temporary Impacts

Direct Impacts

No human remains localities were identified through the SCIC records search, NAHC and tribal correspondence, or through intensive pedestrian survey of the area. However, previous projects immediately adjacent to the current proposed project APE have identified human remains within soils eroded from upstream during previous San Diego River flood events. Because the proposed project APE contains similar soil conditions as were found within adjacent projects where human remains were identified, there is an increased likelihood that human remains could be encountered within the proposed project APE during project-related ground disturbance. Dudek recommends archaeological and Native American monitoring occur during initial ground-disturbing activities. Should construction or other personnel encounter any previously undocumented human remains, the proposed project would result in a **potentially significant** impact; therefore, mitigation is provided (see **MM-CUL-2** in Section 6, Mitigation Measures).

Indirect Impacts

No known human remains localities were identified through the SCIC records search, NAHC and tribal correspondence, or through the intensive pedestrian survey of the area. However, previous projects immediately adjacent to the current proposed project APE have identified human remains within eroded soils from previous San Diego River flood events. However, there are no known surface manifestations of this resource adjacent to the proposed project. Because the surrounding project area has been substantially developed, any increased vehicle and pedestrian traffic resulting from operation of the project would pose little risk to human remains in the project vicinity. Operational/permanent activities related to the proposed project would **not have an indirect impact** on previously recorded human remains.

Operational/Permanent Impacts

Direct Impacts

No human remains were identified through the SCIC records search, NAHC, and tribal correspondence, or through intensive pedestrian survey of the area. Operational/permanent activities related to the proposed project would **not have a direct impact** to previously identified human remains since they would have been identified and properly mitigated during initial discovery (during construction). Because the surrounding project area has been substantially developed, any increased vehicle and pedestrian traffic resulting from operation of the project would **not have an indirect impact** on previously recorded human remains.

Would the project result in a cumulative impact when considered with other present and probable future projects in the region?

Future probable proposed projects within the City of San Diego (City) could potentially contribute to cumulative impacts on cultural resources. In many cases, site redesign or use of fill could minimize these adverse impacts. Total avoidance of the cultural resources is not a reasonable expectation. Additionally, the increased human activity near cultural resources would lead to greater exposure and potential for illicit artifact collection and inadvertent impacts during construction. The City and County of San Diego both maintain guidelines and protocols for addressing project impacts to cultural resources. These include both systematic surveys in areas of high site-location potential to identify resources and monitoring programs to ensure that construction work is halted if significant resources are discovered. No archaeological resources have been identified through the records searches, NAHC and tribal correspondence, or through intensive pedestrian survey of the area. However, because of the known cultural sensitivity of the San Diego River corridor, there is an increased potential that project construction would impact previously unidentified cultural resources. As such, construction of the proposed project would result in **potentially significant** direct impacts. However, these impacts would be mitigated during the construction phase of the proposed project (see **MM-CUL-1** in Section 6, Mitigation Measures), and the proposed project's contribution to cumulative impacts on archaeological resources would be **less than cumulatively significant**.

Would the project affect a resource listed or eligible for listing in the California Register of Historical Resources (CRHR), or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

No CRHR-listed or eligible cultural resources have been identified through the SCIC records search or through intensive pedestrian survey of the area. The area has been substantially disturbed through the channelization of the San Diego River and is unlikely to contain intact archaeological deposits. However, due to the proximity of the proposed project to the San Diego River, the Kumeyaay trail system that extended along the San Diego River corridor, and the prehistoric village of *Nipawai/Nipaguay and the San Diego Mission*, there is an increased potential for buried cultural deposits within the proposed project area. Construction related to the proposed project may have a direct impact to previously unidentified CRHR-eligible cultural resources. Dudek recommends archaeological and Native American monitoring during initial ground-disturbing activities. Should construction or other personnel encounter any CRHR eligible cultural resources within the proposed project area, the proposed project would result in **potentially significant** impacts; therefore, mitigation is provided (see **MM-CUL-1** in Section 6, Mitigation Measures).

Would the project affect 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 the Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Construction/Temporary Impacts

Through NAHC outreach letters, one tribal representative stated that cultural resources have been identified adjacent to or within the proposed project APE; however no specific locations were identified and the tribal representative recommended monitoring, not avoidance. Assembly Bill 52 consultation with representatives from two Kumeyaay tribal communities did not identify any known resources within the project area; however, both recommended monitoring during ground disturbance to protect previously unidentified tribal cultural resources. Because construction related to the proposed project may have a direct impact to previously unidentified tribal cultural resources, Dudek recommends archaeological and Native American monitoring during initial ground-disturbing activities. Should construction or other personnel encounter any archaeological or tribal cultural resources material within the proposed project area, the proposed project would result in **potentially significant** impacts; therefore, mitigation is provided (see **MM-CUL-1** in Section 6, Mitigation Measures).

6 Mitigation Measures

The following mitigation measures (MM) would reduce the potential for impacts on cultural resources.

MM-CUL-1 In order to mitigate impacts to cultural resources to a level that is less than significant, procedures for proper treatment of unanticipated archaeological finds must comply with the California Environmental Quality Act (CEQA) Guidelines. Adherence to the following requirements during initial earth-disturbing activities will assure the proper treatment of unanticipated archaeological or Native American cultural material:

1. A qualified archaeological monitor and Kumeyaay Native American monitor shall be present full-time during all initial ground-disturbing activities of previously undisturbed soils. If proposed project excavation later present evidence suggesting a decrease in cultural sensitivity such as geologic formation predating human occupation of the Americas, the monitoring schedule can be reduced pending archaeological, Native American, and San Diego State University (SDSU) consultation.
2. In the event that previously unidentified potentially significant cultural resources are discovered, the archaeological monitor, Kumeyaay Native American monitor, construction or other personnel shall have the authority to divert or temporarily halt ground disturbance operations within 50 feet of the find. The archaeological monitor shall promptly evaluate and document isolates and clearly non-significant deposits in the field. More significant deposits shall be evaluated under the direction of the lead archaeologist on the proposed project, in consultation with the Native American monitor and SDSU staff. For significant cultural resources, a Research Design and Data Recovery Program to mitigate impacts shall be prepared by the qualified archaeologist and approved by SDSU, then carried out expeditiously using professional archaeological methods. The Research Design and Data Recovery Program shall include (1) reasonable efforts to preserve (avoidance) "unique" cultural resources or Sacred Sites pursuant to CEQA Section 21083.2(g) as the preferred option; (2) the capping of identified Sacred Sites or unique cultural resources and placement of development over the cap, if avoidance is infeasible; and (3) data recovery for unavoidable cultural resources. Construction activities will be allowed to resume in the affected area only after proper evaluation, as described above.

MM-CUL-2 In order to mitigate impacts to human remains to a level that is less than significant, procedures for proper treatment of unanticipated finds must comply with the California Environmental Quality Act (CEQA) Section 15064.5(e). In the event of discovery of unanticipated human remains, personnel shall comply with California Public Resources Code Section 5097.98, CEQA Section 15064.5, and Health and Safety Code Section 7050.5 during ground-disturbing activities:

a. If any human remains are discovered, the construction personnel or the appropriate representative shall contact the County Coroner and San Diego State University. Upon identification of human remains, no further disturbance shall occur in the immediate area of the find until the County Coroner has made the necessary findings as to origin. If the remains are determined to be of Native American origin, the Most Likely Descendant, as identified by the Native American Heritage Commission, shall be contacted by the property owner or their

representative to make recommendations regarding the proper treatment and disposition of the remains. The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until the opportunity to complete consultation with the Most Likely Descendant regarding their recommendations as required by California Public Resources Code Section 5097.98 has occurred. California Public Resources Code Section 5097.98, CEQA Section 15064.5 and California Health and Safety Code Section 7050.5 shall be followed.

7 Level of Significance After Mitigation

By ensuring proper treatment of unanticipated archaeological finds or human remains, implementation of the mitigation measures identified above would mitigate any potential direct impacts caused by construction of the proposed project to unique cultural or tribal cultural resources to **less than significant**. Further, construction and operation of the proposed project would **not result in significant indirect impacts** to unique cultural or tribal cultural resources. Therefore, implementation of the proposed project would result in no significant impacts to these types of resources.

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8 References Cited

Basgall, M.E., and M. Hall. 1990. “Adaptive Variation in the North-Central Mojave Desert.” Paper presented at the 55th Annual Meeting of the Society for American Archaeology, Las Vegas, Nevada.

Basgall, M. E., L. Johnson, and M. Hale. 2002. “An Evaluation of Four Archaeological Sites in the Lead Mountain Training Area, Marine Corps Air Ground Combat Center, Twentynine Palms, California.” Submitted to U.S. Army Corps of Engineers, Fort Worth, Texas.

Bean, L.J., and F.C. Shipek. 1978. “Luiseño.” In *Handbook of North American Indians*, Vol. 8, *California*, edited by R.F. Heizer 550–563. Washington, D.C.: Smithsonian Institution.

Boscana, G. 1846. “Chinigchinich; A Historical Account of the Origin, Customs, and Traditions of the Indians at the Missionary Establishment of St. Juan Capistrano, Alta California.” In *Life in California*, by A. Robinson, 227–341. New York, New York: Wiley & Putnam.

Byrd, B.F., and S.N. Reddy. 2002. “Late Holocene Adaptations along the Northern San Diego Coastline: New Perspectives on Old Paradigms.” In *Cultural Complexity on the California Coast: Late Holocene Archaeological and Environmental Records*, edited by J.M. Erlandson and T.L. Jones, 41–62. Los Angeles, California: University of California–Los Angeles Press.

City of San Diego. 2001. “City of San Diego Historical Resources Guidelines.” San Diego Municipal Code: Land Development Code. San Diego, California.

City of San Diego. 2007. City of San Diego General Plan Program EIR. September 2007.

City of San Diego. 2018. “Historical Resources Regulations.” San Diego Municipal Code. San Diego, California.

CSP (California State Parks). 2009. “Preservation Matters.” *The Newsletter of the California Office of Historic Preservation* 2(3):3–21.

Davis, J.T. 1961. “Trade Routes and Economic Exchange among the Indians of California. *University of California Archaeological Survey Reports* 54. Berkeley.

Davis, E.L. 1978. *The Ancient Californians: Rancholabrean Hunters of the Mojave Lakes Country*. Los Angeles, California: Natural History Museum of Los Angeles County.

Fages, P. 1937. *A Historical, Political, and Natural Description of California* (1775). Translated by H.I. Priestly. Berkeley, California: University of California Press.

Gallegos, D.R. 1987. “San Dieguito-La Jolla: Chronology and Controversy.” San Diego County Archaeological Society, Research Paper No. 1.

Gallegos, D., and C. Kyle. 1988. *Five Thousand Years of Maritime Subsistence at Ballast Point Prehistoric Site SDI-48 (W-164), San Diego, California*. San Diego, California: WESTEC Services.

Geiger, M. and C.W. Meighan. 1976. *As the Padres Saw Them: California Indian Life and Customs as Reported by the Franciscan Missionaries, 1813–1815.* Santa Barbara, California: Santa Barbara Mission Archive Library.

Golla, V. 2007. "Linguistic Prehistory." In *California Prehistory: Colonization, Culture, and Complexity,* edited by T.L. Jones and K.A. Klar, 71–82. New York, New York: Altamira Press.

Griset, S. 1996. "Southern California Brown Ware." Unpublished PhD dissertation; University of California, Riverside.

Hale, M. 2001. "Technological Organization of the Millingstone Pattern in Southern California." Master's thesis; California State University, Sacramento.

Hale, M. 2009. "San Diego and Santa Barbara: Socioeconomic Divergence in Southern California." PhD dissertation; University of California, Davis.

Harrington, J.P. 1934. "A New Original Version of Boscana's Historical Account of the San Juan Capistrano Indians of Southern California." *Smithsonian Miscellaneous Collections* 92(4).

Hector, S.M. 1984. "Late Prehistoric Hunter-Gatherer Activities in Southern San Diego County." PhD dissertation; University of California, Los Angeles.

Heizer, R. F. 1978. "Trade and Trails." In *California*, edited by R.F. Heizer, 592–609. *Handbook of the North American Indians*, Vol. 8, W.C. Sturtevant, general editor. Washington, D.C.: Smithsonian Institution.

Hill, J. 2002. "Dry Rivers, Dammed Rivers and Floods: An Early History of the Struggle between Droughts and Floods in San Diego. *The Journal of San Diego History* 48: 48-59.

Johnson, J.R., and J.G. Lorenz. 2006. "Genetics, Linguistics, and Prehistoric Migrations: An Analysis of California Indian Mitochondrial DNA Lineages." *Journal of California and Great Basin Anthropology* 26:33–64.

Kroeber, A. 1925 *Handbook of the Indians of California.* Washington D.C.: Smithsonian Institution.

Laylander, D. 1985. "Some Linguistic Approaches to Southern California's Prehistory." *San Diego State University Cultural Resource Management Center Casual Papers* 2(1):14–58.

Laylander, D. 2000. *Early Ethnography of the Californias, 1533–1825*. Salinas, California: Coyote Press Archives of California Prehistory.

Laylander, D. 2010. "Linguistic Prehistory." Research Issues In San Diego Prehistory. Accessed August 31, 2012. http://www.sandiegoarchaeology.org/Laylander/Issues/index.htm.

Lightfoot, K. 2005. *Indians, Missionaries, and Merchants: The Legacy of Colonial Encounters on the California Frontiers*. Berkley, California: University of California Press.

Luomala, K. 1978. "Tipai and Ipai." In *California*, edited by R.F. Heizer, 592–609. *Handbook of the North American Indians*, Vol. 8, W.C. Sturtevant, general editor. Washington, D.C.: Smithsonian Institution.

Meighan, C.W. 1959. "California Cultures and the Concept of an Archaic Stage." *American Antiquity* 24:289–305.

NETR. 2023. Historic Aerial Imagery Website by the Nationwide Environmental Title Search, LLC. https://www.historicaerials.com/viewer. Accessed February, May 2023.

Owen, R.C. 1965. "The Patrilineal Band: A Linguistically and Culturally Hybrid Social Unit." *American Anthropologist* 67:675–690.

Pigniolo, A.R. 2004. "Points, Patterns, and People: Distribution of the Desert Side-Notched Point in San Diego." *Proceedings of the Society for California Archaeology* 14:27–39.

Pigniolo, A.R. 2005. "Subsistence, Settlement, and Environmental Change at San Diego Bay." *Proceedings of the Society for California Archaeology* 18:255–259.

Pourade, R.F. 1960–1967. *The History of San Diego*. 6 vols. San Diego, California: Union-Tribune Publishing Company.

Preston, W.L. 2002. "Portents of Plague from California's Protohistoric Period." *Ethnohistory* 49:69–121.

Rogers, M.J. 1929. "The Stone Art of the San Dieguito Plateau." *American Anthropologist* 31:454–467.

Rogers, M.J. 1945. "An Outline of Yuman Pehistory." *Southwestern Journal of Anthropology* 1:167–198.

San Diego County Board of Supervisors. 2007. County of San Diego CEQA Guidelines. San Diego: San Diego County.

Shipek, F.C. 1982. "Kumeyaay Socio-Political Structure." *Journal of California and Great Basin Anthropology* 4:296–303.

Shipek, F.C. 1985. "Kuuchamaa: The Kumeyaay Sacred Mountain." *Journal of California and Great Basin Anthropology* 7(1):67–74.

Shipek, F.C. 1993. "Kumeyaay Plant Husbandry: Fire, Water, and Erosion Management Systems." In *Environmental Management by Native Californians*, edited by T.C. Blackburn and K. Anderson, pp. 379-388. Ballena Press.

Spier, L. 1923. "Southern Diegueño Customs." *University of California Publications in American Archaeology and Ethnology* 20:295–358.

True, D.L. 1966. "Archaeological Differentiation of Shoshonean and Yuman Speaking Groups in Southern California." Unpublished PhD dissertation; University of California, Los Angeles.

True, D.L. 1980. "The Pauma Complex in Northern San Diego County: 1978." *Journal of New World Archaeology* 3(4):1–39.

U.S. Army Corps of Engineers. "San Diego River 1 Levee System Periodic Inspection Report No 1 Generalized Executive Summary" https://www.spl.usace.army.mil/Portals/17/docs/LeveeSafetyProgram/San_Diego_River_1_Levee_System_PI_Report_No1_ES_U_20150930.pdf Accessed June 2023.

Wallace, W.J. 1955. "A Suggested Chronology for Southern California Coastal Archaeology." *Southwestern Journal of Anthropology* 11:214–230.

Warren, C.N. 1964. "Cultural Change and Continuity on the San Diego Coast." Unpublished PhD dissertation; University of California, Los Angeles.

Warren, C.N. 1968. "Cultural Tradition and Ecological Adaptation on the Southern California Coast." In *Archaic Prehistory in the Western United States*, edited by C. Irwin-Williams, 1–14. Portales, New Mexico: Eastern New Mexico University Contributions in Anthropology.

Warren, C.N. and M.G. Pavesic. 1963. "Appendix 1: Shell Midden Analysis of Site SDi-603 and Ecological Implications for Cultural Development of Batiquitos Lagoon, San Diego County, California." In *Archaeological Survey Annual Report*. Los Angeles, California: University of California, Los Angeles.

Warren, C.N., G. Siegler, and F. Dittmer. 2004. "Paleoindian and Early Archaic Periods." In *Prehistoric and Historic Archaeology of Metropolitan San Diego: A Historic Properties Background Study*. Prepared for the Metropolitan Wastewater Department, City of San Diego. Encinitas, California: ASM Affiliates.

Wilken, M. 2012. "An Ethnobotany of Baja California's Kumeyaay Indians." Master's thesis; San Diego State University.

Appendix A

SCIC Records Search Results (Confidential)

Appendix B

NAHC Sacred Lands File Search and
Native American Outreach

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: SDSU Fenton Bridge Project - Dudek No. 15057
County: San Diego

USGS Quadrangle
Name: La Mesa and La Jolla
Township: 16S Range: 2W Section(s): Unsectioned

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:
Development of a bridge connecting Fenton Parkway to the southern side of San Diego River.

☑ Project Location Map is attached

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

March 28, 2023

Matthew DeCarlo
Dudek

Via Email to: mdecarlo@dudek.com

Re: SDSU Fenton Bridge - Dudek No. 15057 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 positive. Please contact the tribes on the attached list for more information. 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
3/28/2023

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

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

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
Javaughn Miller, Tribal Administrator
8 Crestwood Road Diegueno
Boulevard, CA, 91905
Phone: (619) 478 - 2113
Fax: (619) 478-2125
jmiller@LPtribe.net

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

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 SDSU Fenton Bridge - Dudek No. 15057 Project, San Diego County.

Native American Heritage Commission
Native American Contact List
San Diego County
3/28/2023

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

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

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

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

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 SDSU Fenton Bridge - Dudek No. 15057 Project, San Diego County.

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

April 25, 2023 15057

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

Subject: Information Request for the Fenton Parkway Bridge Project in the City of San Diego, CA, San Diego County, California

Dear Mr. Christman,

San Diego State University is proposing to construct a bridge connecting the southern extent Fenton Parkway to Camino Del Rio North in San Diego, CA. The area falls within unsectioned land of Township 16S/ Range 2W of the La Jolla and La Mesa, CA 1:24,000 USGS maps (Figure 1).

The Native American Heritage Commission conducted a Sacred Lands file search. The results were positive. 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. This letter does not constitute formal government to government consultation pursuant to Assembly Bill 52.

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

Respectfully,

Matthew H. DeCarlo

_____

Matthew DeCarlo, M.A.
Archaeologist
DUDEK
Phone: (760) 815-7067
Email: mdecarlo@dudek.com

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MAIN OFFICE
605 THIRD STREET
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April 25, 2023 15057

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

Subject: Information Request for the Fenton Parkway Bridge Project in the City of San Diego, CA, San Diego County, California

Dear Ms. Cumper,

San Diego State University is proposing to construct a bridge connecting the southern extent Fenton Parkway to Camino Del Rio North in San Diego, CA. The area falls within unsectioned land of Township 16S/ Range 2W of the La Jolla and La Mesa, CA 1:24,000 USGS maps (Figure 1).

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Respectfully,

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Email: mdecarlo@dudek.com

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April 25, 2023 15057

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 Fenton Parkway Bridge Project in the City of San Diego, CA, San Diego County, California

Dear Mr. Flores,

San Diego State University is proposing to construct a bridge connecting the southern extent Fenton Parkway to Camino Del Rio North in San Diego, CA. The area falls within unsectioned land of Township 16S/ Range 2W of the La Jolla and La Mesa, CA 1:24,000 USGS maps (Figure 1).

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April 25, 2023 15057

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

Subject: Information Request for the Fenton Parkway Bridge Project in the City of San Diego, CA, San Diego County, California

Dear Mr. Garcia,

San Diego State University is proposing to construct a bridge connecting the southern extent Fenton Parkway to Camino Del Rio North in San Diego, CA. The area falls within unsectioned land of Township 16S/ Range 2W of the La Jolla and La Mesa, CA 1:24,000 USGS maps (Figure 1).

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April 25, 2023 15057

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

Subject: Information Request for the Fenton Parkway Bridge Project in the City of San Diego, CA, San Diego County, California

Dear Mr. Goff,

San Diego State University is proposing to construct a bridge connecting the southern extent Fenton Parkway to Camino Del Rio North in San Diego, CA. The area falls within unsectioned land of Township 16S/ Range 2W of the La Jolla and La Mesa, CA 1:24,000 USGS maps (Figure 1).

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April 25, 2023 15057

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 Fenton Parkway Bridge Project in the City of San Diego, CA, San Diego County, California

Dear Mr. Lawson,

San Diego State University is proposing to construct a bridge connecting the southern extent Fenton Parkway to Camino Del Rio North in San Diego, CA. The area falls within unsectioned land of Township 16S/ Range 2W of the La Jolla and La Mesa, CA 1:24,000 USGS maps (Figure 1).

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April 25, 2023 15057

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 Fenton Parkway Bridge Project in the City of San Diego, CA, San Diego County, California

Dear Mr. Linton,

San Diego State University is proposing to construct a bridge connecting the southern extent Fenton Parkway to Camino Del Rio North in San Diego, CA. The area falls within unsectioned land of Township 16S/ Range 2W of the La Jolla and La Mesa, CA 1:24,000 USGS maps (Figure 1).

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April 25, 2023 15057

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

Subject: Information Request for the Fenton Parkway Bridge Project in the City of San Diego, CA, San Diego County, California

Dear Mr. Linton,

San Diego State University is proposing to construct a bridge connecting the southern extent Fenton Parkway to Camino Del Rio North in San Diego, CA. The area falls within unsectioned land of Township 16S/ Range 2W of the La Jolla and La Mesa, CA 1:24,000 USGS maps (Figure 1).

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April 25, 2023 15057

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

Subject: Information Request for the Fenton Parkway Bridge Project in the City of San Diego, CA, San Diego County, California

Dear Ms. Lucas,

San Diego State University is proposing to construct a bridge connecting the southern extent Fenton Parkway to Camino Del Rio North in San Diego, CA. The area falls within unsectioned land of Township 16S/ Range 2W of the La Jolla and La Mesa, CA 1:24,000 USGS maps (Figure 1).

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

Respectfully,

Matthew H. DeCarlo

Matthew DeCarlo, M.A.
Archaeologist
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April 25, 2023 15057

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

Subject: Information Request for the Fenton Parkway Bridge Project in the City of San Diego, CA, San Diego County, California

Dear Mr. Martinez,

San Diego State University is proposing to construct a bridge connecting the southern extent Fenton Parkway to Camino Del Rio North in San Diego, CA. The area falls within unsectioned land of Township 16S/ Range 2W of the La Jolla and La Mesa, CA 1:24,000 USGS maps (Figure 1).

The Native American Heritage Commission conducted a Sacred Lands file search. The results were positive. 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. This letter does not constitute formal government to government consultation pursuant to Assembly Bill 52.

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

Respectfully,

Matthew H. DeCarlo

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Matthew DeCarlo, M.A.
Archaeologist
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April 25, 2023 15057

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

Subject: Information Request for the Fenton Parkway Bridge Project in the City of San Diego, CA, San Diego County, California

Dear Ms. Miller,

San Diego State University is proposing to construct a bridge connecting the southern extent Fenton Parkway to Camino Del Rio North in San Diego, CA. The area falls within unsectioned land of Township 16S/ Range 2W of the La Jolla and La Mesa, CA 1:24,000 USGS maps (Figure 1).

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Respectfully,

Matthew H. DeCarlo

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Matthew DeCarlo, M.A.
Archaeologist
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April 25, 2023 15057

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

Subject: Information Request for the Fenton Parkway Bridge Project in the City of San Diego, CA, San Diego County, California

Dear Ms. Orosco,

San Diego State University is proposing to construct a bridge connecting the southern extent Fenton Parkway to Camino Del Rio North in San Diego, CA. The area falls within unsectioned land of Township 16S/ Range 2W of the La Jolla and La Mesa, CA 1:24,000 USGS maps (Figure 1).

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Respectfully,

Matthew H. DeCarlo

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Archaeologist
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Phone: (760) 815-7067
Email: mdecarlo@dudek.com

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April 25, 2023 15057

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

Subject: Information Request for the Fenton Parkway Bridge Project in the City of San Diego, CA, San Diego County, California

Dear Ms. Osuna,

San Diego State University is proposing to construct a bridge connecting the southern extent Fenton Parkway to Camino Del Rio North in San Diego, CA. The area falls within unsectioned land of Township 16S/ Range 2W of the La Jolla and La Mesa, CA 1:24,000 USGS maps (Figure 1).

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Respectfully,

Matthew H. DeCarlo

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Archaeologist
DUDEK
Phone: (760) 815-7067
Email: mdecarlo@dudek.com

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

April 25, 2023 15057

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

Subject: Information Request for the Fenton Parkway Bridge Project in the City of San Diego, CA, San Diego County, California

Dear Ms. Parada,

San Diego State University is proposing to construct a bridge connecting the southern extent Fenton Parkway to Camino Del Rio North in San Diego, CA. The area falls within unsectioned land of Township 16S/ Range 2W of the La Jolla and La Mesa, CA 1:24,000 USGS maps (Figure 1).

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Matthew H. DeCarlo

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April 25, 2023 15057

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

Subject: Information Request for the Fenton Parkway Bridge Project in the City of San Diego, CA, San Diego County, California

Dear Mr. Perez,

San Diego State University is proposing to construct a bridge connecting the southern extent Fenton Parkway to Camino Del Rio North in San Diego, CA. The area falls within unsectioned land of Township 16S/ Range 2W of the La Jolla and La Mesa, CA 1:24,000 USGS maps (Figure 1).

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April 25, 2023 15057

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

Subject: Information Request for the Fenton Parkway Bridge Project in the City of San Diego, CA, San Diego County, California

Dear Mr. Pingleton,

San Diego State University is proposing to construct a bridge connecting the southern extent Fenton Parkway to Camino Del Rio North in San Diego, CA. The area falls within unsectioned land of Township 16S/ Range 2W of the La Jolla and La Mesa, CA 1:24,000 USGS maps (Figure 1).

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April 25, 2023 15057

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

Subject: Information Request for the Fenton Parkway Bridge Project in the City of San Diego, CA, San Diego County, California

Dear Mr. Pinto,

San Diego State University is proposing to construct a bridge connecting the southern extent Fenton Parkway to Camino Del Rio North in San Diego, CA. The area falls within unsectioned land of Township 16S/ Range 2W of the La Jolla and La Mesa, CA 1:24,000 USGS maps (Figure 1).

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

April 25, 2023 15057

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

Subject: Information Request for the Fenton Parkway Bridge Project in the City of San Diego, CA, San Diego County, California

Dear Ms. Pinto,

San Diego State University is proposing to construct a bridge connecting the southern extent Fenton Parkway to Camino Del Rio North in San Diego, CA. The area falls within unsectioned land of Township 16S/ Range 2W of the La Jolla and La Mesa, CA 1:24,000 USGS maps (Figure 1).

The Native American Heritage Commission conducted a Sacred Lands file search. The results were positive. 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. This letter does not constitute formal government to government consultation pursuant to Assembly Bill 52.

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

Respectfully,

Matthew H. DeCarlo

_____

Matthew DeCarlo, M.A.
Archaeologist
DUDEK
Phone: (760) 815-7067
Email: mdecarlo@dudek.com

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April 25, 2023 15057

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

Subject: Information Request for the Fenton Parkway Bridge Project in the City of San Diego, CA, San Diego County, California

Dear Ms. Santos,

San Diego State University is proposing to construct a bridge connecting the southern extent Fenton Parkway to Camino Del Rio North in San Diego, CA. The area falls within unsectioned land of Township 16S/ Range 2W of the La Jolla and La Mesa, CA 1:24,000 USGS maps (Figure 1).

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April 25, 2023 15057

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

Subject: Information Request for the Fenton Parkway Bridge Project in the City of San Diego, CA, San Diego County, California

Dear Mr. Welch,

San Diego State University is proposing to construct a bridge connecting the southern extent Fenton Parkway to Camino Del Rio North in San Diego, CA. The area falls within unsectioned land of Township 16S/ Range 2W of the La Jolla and La Mesa, CA 1:24,000 USGS maps (Figure 1).

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From: Ray Teran <rteran@viejas-nsn.gov>

Sent: Tuesday, May 2, 2023 12:43 PM

To: Matthew DeCarlo

Cc: Ernest Pingleton

Subject:Fenton Parkway Bridge

The Viejas Band of Kumeyaay Indians (“Viejas”) has reviewed the proposed project and at this time we have determined that the project site has cultural significance or ties to Viejas. Cultural resources have been located within or adjacent to the APE-DE of the proposed project.

Viejas Band request that a Kumeyaay Cultural Monitor be on site for ground disturbing activities and to inform us of any new developments such as inadvertent discovery of cultural artifacts, cremation sites, or human remains.

If you wish to utilize Viejas cultural monitors (Viejas rate is $54.15/hr. plus GSA mileage), please call Ernest Pingleton at 619-655-0410 or email, epingleton@viejas-nsn.gov, for contracting and scheduling. Thank you.

Ray Teran

Viejas Tribal Government

Resource Management Director

619-659-2312

rteran@viejas-nsn.gov