



# Draft Cultural Resource Technical Memorandum

City of Encinitas,  
Verdi Avenue Pedestrian Rail Undercrossing  
Project

March 2024



*This page is intentionally blank.*

## Contents

1	Introduction.....	1
2	Project Location and Description .....	3
	2.1 Project Location.....	3
	2.2 Project Description .....	3
	2.2.1 Applicant Proposed Measures .....	<b>Error! Bookmark not defined.</b>
	2.2.2 Definitions.....	5
3	Methodology.....	9
4	Regulatory Context.....	11
	4.1 National Environmental Policy Act .....	11
	4.2 National Historic Preservation Act.....	11
	4.3 California Environmental Quality Act.....	12
	4.4 Assembly Bill 52 .....	12
	4.5 City of Encinitas General Plan Resource Management Element (Amended 3-9-11) .....	12
5	Environmental Setting .....	15
	5.1 Identification of Cultural Resources .....	15
6	Impact Assessment .....	17
	6.1 Archaeological Resources .....	17
	6.2 Built Environment Resources.....	17
7	Conclusion.....	19
8	References .....	23

## Tables

Table 1. Previously Recorded Cultural Resources within 0.5 Mile of the Project Area of Potential Effect .....	15
---	----

## Figures

Figure 1. Regional Vicinity and Project Location .....	6
Figure 2. Major Project Components and Area of Potential Effect .....	7
Figure 3. Overview of Project Area of Potential Effect (view Southeast along NCTD Tracks).....	8

## Appendices

Appendix A. Record Search Maps (CONFIDENTIAL)
---

*This page is intentionally blank.*

# 1 Introduction

This Cultural Resource Technical Memorandum was prepared for the proposed Verdi Avenue Pedestrian Rail Undercrossing Project (project), located near the community of Cardiff in the City of Encinitas. The purpose of this analysis was to identify whether the project would affect any previously or newly recorded archaeological or built environment resources located within the project's area of potential effect (APE).

*This page is intentionally blank.*

## 2 Project Location and Description

### 2.1 Project Location

The project is located in the Cardiff community generally between Verdi Avenue and Liszt Avenue in the City of Encinitas (Figure 1, Regional Vicinity and Project Location). The project site (synonymous with project footprint) is approximately 4.06 acres located primarily within the railroad ROW owned by NCTD, and also includes portions of adjacent City streets (San Elijo Avenue and South Coast Highway 101).

A 1.3-mile segment of the Coastal Rail Trail (CRT) was recently constructed through the project site parallel and to the east of the railroad tracks. The project site is approximately 870 feet north of the Montgomery Avenue pedestrian crossing location previously approved with the Encinitas Grade Separated Pedestrian Crossings Project.

Surrounding land uses include:

- North – railroad ROW. The undercrossing at Santa Fe Drive located 2/3 mile to the north of the project site provides a safe and legal railroad crossing.
- East – San Elijo Avenue; the land across San Elijo Avenue is occupied by single-family residences.
- South – railroad ROW. Chesterfield Drive is located 2/3 mile to the south of the project site provides a safe and legal railroad crossing.
- West – South Coast Highway 101; the land across South Coast Highway 101 is occupied by San Elijo State Beach.

### 2.2 Project Description

The project would provide a safe and legal railroad crossing between two locations along San Elijo Avenue and South Coast Highway 101 (Figure 2, Major Project Components and APE).

A summary of the major project components and design elements is provided below:

- *Railroad Undercrossing* – The project includes a new three-span double-track undercrossing structure within the NCTD railroad ROW (perpendicular to the tracks) at approximately Milepost 239.3. The undercrossing includes a 10-foot-wide paved pathway, ramp, and stairs connecting to the paths of travel east of the railroad, and sidewalks connecting to South Coast Highway 101 west of the railroad.
- *Landscaping and Planting* - The proposed landscaping would resemble a unified palette that blends well with the appearance of recently completed undercrossing projects to the north and south of the project site (Santa Fe and El Portal crossings) and the adjacent CRT project. The proposed plant material will consist of California and Baja natives. The design guidelines for the CRT established by the Coastal Mobility and Livability Working Group were considered to achieve a seamless transition where the two projects adjoin.
- *Hardscape Elements* – The project theme would be “Land,” similar to the previously-approved theme for the Montgomery Avenue crossing, and would include hardscape features that emphasize the coastal bluffs that occur within the City’s coastline (Figure 3,

Project Design Elements). The project includes 10-foot-wide meandering pathways, new retaining walls, garden walls, and public art on the undercrossing that would complement the existing natural coastal environment and community aesthetics. Community input has been received through project specific outreach events where over 60 residents came to express their views.

Proposed hardscape features would include earth-tone colored concrete along the pedestrian ramps, a steel grate pathway with cobble and rip rap under the railroad tracks, stone facade at the access points on both sides of the undercrossing, and ADA ramps and stair access. Decorative garden walls would incorporate a special treatment to emulate natural bluff layers.

- *Fencing* - To promote use of the undercrossing, 4-foot-high post and cable fencing would be installed along the western perimeter of the railroad ROW for a distance to be determined by California Public Utilities Commission (CPUC). On the east side of the tracks, fencing will tie into the CRT fencing already in place.
- *Lighting* – The project would include 70-watt, high-pressure sodium lights mounted on 42-inch-high bollards along the meandering pathways and near the undercrossing entrances, 25-watt fluorescent step lights mounted to the railings along pedestrian ramps, and 100-watt high-pressure sodium fixtures mounted below the undercrossing bridge. Lighting at the undercrossing would consist of a ceiling mounted fixture that is vandal resistant. Lighting would primarily consist of footpath lighting for pedestrian safety with most lighting in the tunnel and are not anticipated to impact residential land uses on San Elijo Avenue.
- *New Crosswalks* – The project includes new 15-foot-wide yellow crosswalks located at the intersections of San Elijo Avenue/Verdi Avenue and San Elijo Avenue/Liszt Avenue that would direct pedestrians and bikers to enhanced entry points to the project site. These paths of travel would allow pedestrians and bikers to cross the surface features, fencing, and the segment of the CRT through the project site. The project also includes a new 20-foot wide white crosswalks along the north and southbound lanes of South Coast Highway 101 that would be compatible with existing and planned bike lanes. Crosswalks along South Coast Highway 101 would be protected by a mid-block, pedestrian-activated signal and associated crosswalk infrastructure.
- *Grading and Drainage* – The project includes 2:1 manufactured slopes throughout the project site with new retaining walls up to 10 feet in height. The project would increase impervious surface area by 15,025 square feet and would require 4,793 cubic yards of cut and 1,274 cubic yards of fill; thereby resulting in a total net export of 3,518 cubic yards of soil.

New drainage infrastructure and permanent Best Management Practices are proposed to withstand the concentrated flow from Verdi Avenue and the existing trackside ditch through the project limits. Storm drain design would adhere to the guidelines set forth in Chapter 6 of the City of Encinitas Engineering Design Manual dated October 2009. Proposed drainage infrastructure is described below:

- A 30-inch reinforced concrete pipe storm drain system is proposed to drain flows entering the proposed catch basin on San Elijo Avenue. This storm drain system is proposed to turn south and run under the CRT where it would join with the flows from the existing track side ditch.



- A 5-foot by 3-foot reinforced concrete block is proposed to route the existing track ditch flows through the project site. A headwall is proposed where the existing track ditch will be discharged. The flow from the 30-inch reinforced concrete pipe storm drain will join with the track ditch flow in the reinforced concrete box culvert under the CRT. Once the reinforced concrete box culvert crosses the southern access ramp down to the underpass the reinforced concrete box culvert would turn and outlet into the track ditch.
- Trackside ditches are proposed where necessary to prevent on-site and off-site drainage into the ballast area. Lined ditches are proposed only where space was limited, or slope or velocity constraints require their use.
- A 21-foot-long catch basin in a sump condition is proposed on San Elijo Avenue at the outlet of the existing cross-gutter at Verdi Avenue. A 21-foot-long catch basin, with a 4-foot depth is proposed.
- A pump station is proposed to capture runoff tributary to the undercrossing, and divert this water into the RCB culvert used to divert the trackside ditch and Verdi Avenue runoff. An 18-inch reinforced concrete pipe is proposed to convey runoff from the pumps to the proposed reinforced concrete box culvert under the CRT.
- An articulated concrete block ditch is proposed south of the underpass to prevent erosion and protect against higher velocities.

The proposed facilities would be sized to convey runoff and protect the undercrossing during a 100-year storm event. The 100-year storm event meets NCTD design requirements, and would maintain long-term functionality of the undercrossing. Water quality Best Management Practices would be incorporated into proposed infrastructure. The infiltration trenches constructed as part of the CRT would be reconstructed, or the associated water quality volumes will be incorporated into proposed Best Management Practices.

## 2.2.1 Definitions

The following definitions are used in this evaluation:

- **Project Site** is defined as the general location of the proposed undercrossing.
- **Project Footprint** is defined as the limits of impacts associated with full build-out of the proposed project (geographic extent of temporary and permanent impacts).
- **Area of Potential Effects (APE)** - The project APE is a cultural resource term, and includes the entire project footprint. The APE was created to take into consideration both archaeological and built environment resources, encompassing the maximum footprint for construction and ground disturbance. As shown on Figure 2, this takes into account both temporary and permanent project-related disturbance. An overview of the APE is depicted in Figure 3.
- **Record Search Study Area** – The record search study area is defined as a 0.5-mile buffer around the APE. The record search study area is depicted in the record search maps in Appendix A.

Figure 1. Regional Vicinity and Project Location

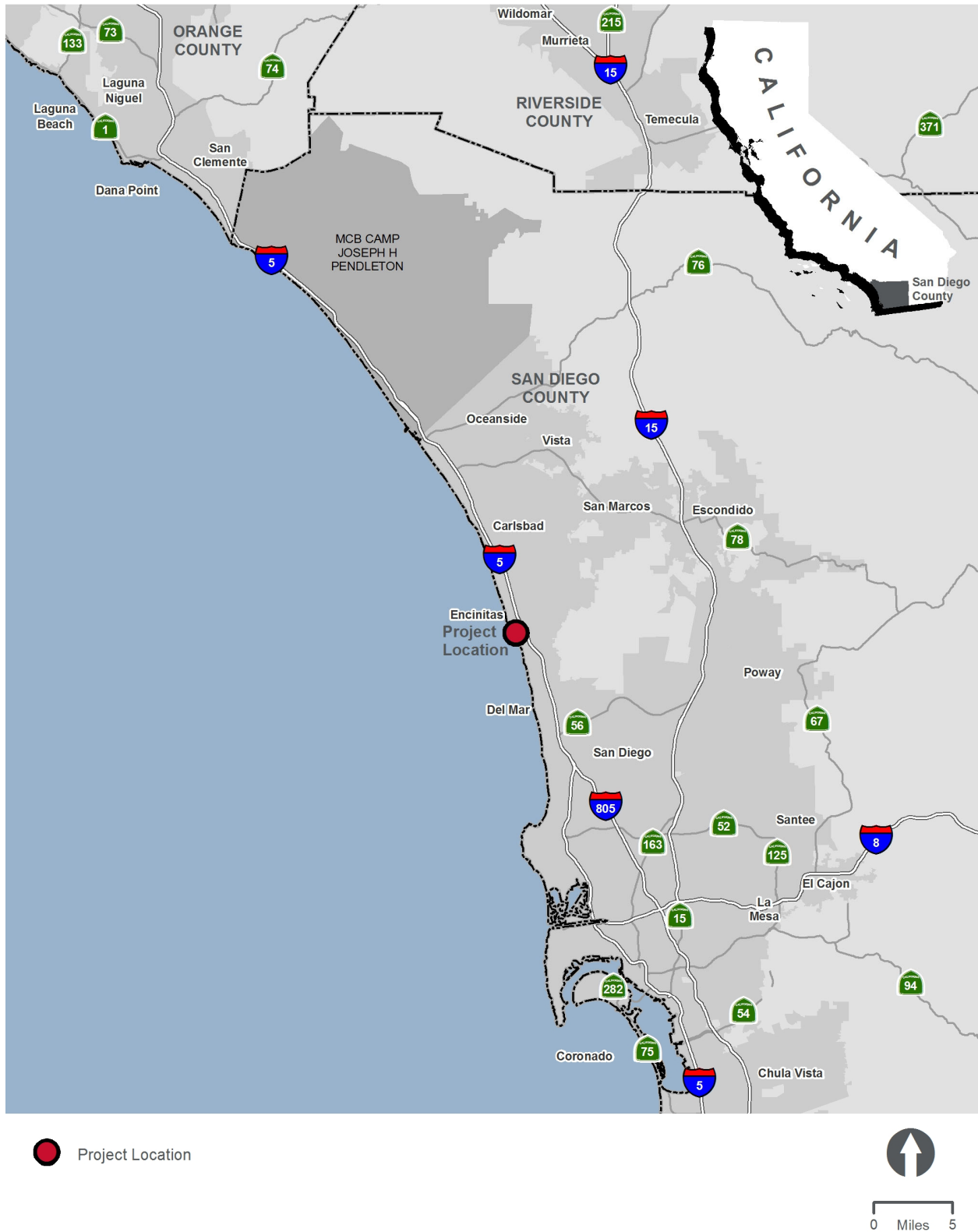
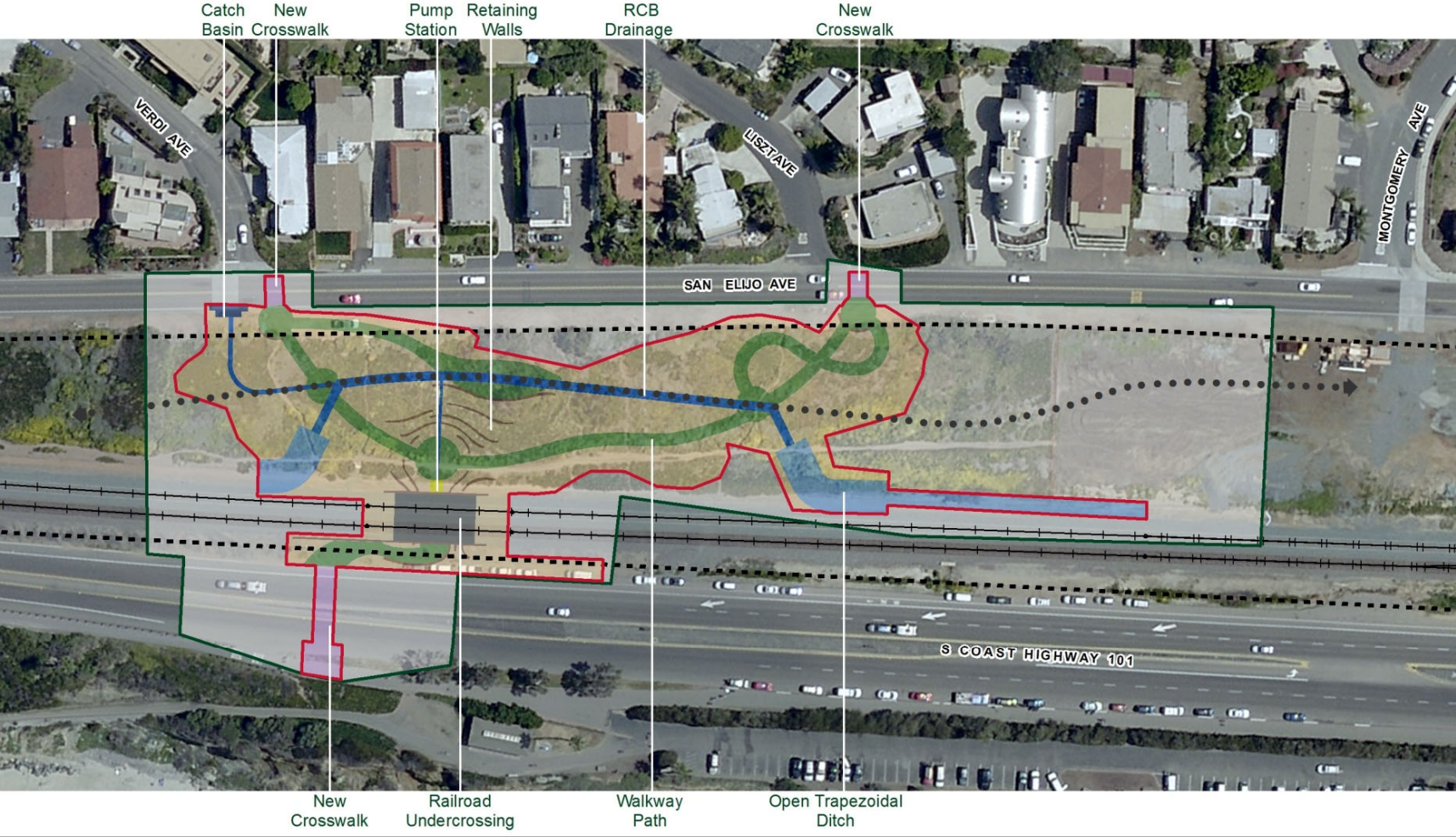


Figure 2. Major Project Components and Area of Potential Effect



- Permanent Impacts
- Temporary Impacts
- Recontoured/Landscaped Area
- Temporary Work Area
- Railroad Right-of-Way
- Coastal Rail Trail (Not a Part)
- Track Alignment





**Figure 3. Overview of Project Area of Potential Effect (view Southeast along NCTD Tracks)**



### 3 Methodology

The pedestrian survey conducted for this reporting was consistent with the Secretary of the Interior's (SOI) Standards and Guidelines for Archaeology and Historic Preservation (48 FR 44716, September 29, 1983). Survey methods conformed to prevailing State of California and SOI Standards and Guidelines. Pedestrian survey transect corridors did not exceed 15 meters on level ground surfaces. The pedestrian survey was conducted by HDR archaeologist Beniamino Volta on May 11, 2018, and included fully documenting previously recorded and newly recorded archaeological and built environment resources within the APE with digital photography (Figure 3) and field notes.

*This page is intentionally blank.*

## 4 Regulatory Context

### 4.1 National Environmental Policy Act

The National Environmental Policy Act (NEPA) of 1969 (42 U.S. Code Section 4321-4347) is a federal statute requiring the identification and analysis of potential environmental impacts associated with proposed federal actions. The intent of NEPA is to help decision makers make well-informed decisions based on an understanding of the potential environmental consequences, and take actions to protect, restore, or enhance the environment. The process for implementing NEPA is outlined in Title 40 of the Code of Federal Regulations (CFR), Parts 1500–1508, *Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act*.

NEPA established the Council on Environmental Quality (CEQ) that was charged with the development of implementing regulations and ensuring Federal agency compliance with NEPA. The CEQ regulations define major Federal actions to include adoption of official policy (i.e., rules and regulations), adoption of formal plans, adoption of programs, and approval of specific projects (40 CFR 1508.18). The CEQ regulations mandate that all Federal agencies use a prescribed structured approach to environmental impact analysis.

### 4.2 National Historic Preservation Act

Section 106 of the National Historic Preservation Act (NHPA; 54 U.S.C. § 306108), which is implemented by the Advisory Council on Historic Preservation's (ACHP) regulations, "Protection of Historic Properties," requires federal agencies to take into account the effects of their undertakings on historic properties and to afford the ACHP a reasonable opportunity to comment (ACHP 2013; 36 CFR § 800.1).

A historic property is defined in the NHPA as "any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion on the National Register, including artifacts, records, and material remains related to such a property or resource" (54 U.S.C. § 300308). If an undertaking has the potential to affect historic properties, the agency determines the scope of appropriate identification efforts and then proceeds to identify historic properties in the APE by applying the National Register of Historic Places criteria (ACHP 2013; 36 CFR § 800.4).

Federal agencies are encouraged to coordinate compliance with Section 106 of the NHPA and the procedures outlined above with any steps taken to meet the requirements of the National Environmental Policy Act of 1969, as amended (NEPA), for project undertakings (ACHP 2013; 36 CFR § 800.8). This technical memo was prepared to fulfill requirements of the NHPA for the identification of historic properties within the project APE and the assessment of adverse effects on said historic properties.

## 4.3 California Environmental Quality Act

The California Environmental Quality Act (CEQA) requires state and local agencies to identify impacts on the environment that might be caused by their actions. Projects undertaken by public or private agencies must comply with CEQA if there is any approval given by a state agency. The CEQA statutes are encoded in the California Public Resources Code (PRC), Sections 21000 et seq., with Guidelines for Implementation codified in the California Code of Regulations (CCR), Title 14, Division 6, Chapter 3, Sections 15000 et seq. CEQA is a self-regulating statute; however, agencies that do not comply may face litigation from the public. CEQA is a statute that requires state agencies to provide information about environmental impacts of their actions and requires that actions be taken to avoid, minimize, or mitigate those impacts.

## 4.4 Assembly Bill 52

With the enactment of Assembly Bill (AB) 52, CEQA recognizes tribal cultural values in addition to the scientific and archaeological values when determining impacts and mitigation by identifying a category of resources called tribal cultural resources (TCR). In order to qualify as a TCR, a resource must be listed, or determined eligible for listing, on the national, state, or local register of historic resources; or be a resource that a lead agency chooses to treat as a TCR based on the CRHR criteria and the cultural value of a resource to a California Native American tribe (PRC § 21074). In order to identify TCRs, lead agencies are required to consult with local Native American tribes in a manner that is cognizant of all parties' cultural values and, where feasible, seeking agreement on a proposed action.

## 4.5 City of Encinitas General Plan Resource Management Element (Amended 3-9-11)

The Resource Management Element of the City's General Plan identifies goals and policies that are designed to preserve significant natural and cultural resources in the city. It also builds upon goals and policies in the other elements, especially the Land Use Element. This Element meets State requirements concerning the Conservation and Open Space Elements as defined in Sections 65302e and 65302f of the Government Code.

The following goals and policies presented in this Element are geared toward the preservation of cultural resources present in the City.

**Goal 7:** The City will make every effort to ensure significant scientific and cultural resources in the Planning Area are preserved for future generations.

- *Policy 7.1:* Require that paleontological, historical, and archaeological resources in the planning area are documented, preserved, or salvaged if threatened by new development.

*Policy 7.2:* Conduct a survey to identify historic structures and archaeological/cultural sites throughout the community and ensure that every action is taken to ensure their preservation.

*Policy 7.3:* The City will pursue the development of a historic resources program to assist in the identification, preservation, and restoration of those buildings, structures, and places within the City that have historic significance.



- *Policy 7.4:* The City will encourage the development of cultural facilities to be made available to the public, such as performing arts theaters, museums, and libraries.

*This page is intentionally blank.*

## 5 Environmental Setting

### 5.1 Identification of Cultural Resources

Prior to field survey, a record search was conducted with the South Coastal Information Center to ensure that all previously recorded archaeological and built environment resources in the APE were taken into account for this study. One hundred percent of the APE, including the railroad ROW and adjacent roadways (San Elijo Avenue and South Coast Highway 101) has been previously surveyed. No resources have previously been identified inside the project APE and four resources have previously been identified inside the half-mile record search buffer (see Confidential Appendix A). Table 1 provides a summary of previously recorded cultural resources outside the APE but within the 0.5-mile record search buffer. No new cultural resources were identified within the APE during survey.

**Table 1. Previously Recorded Cultural Resources within 0.5 Mile of the Project Area of Potential Effect**

Primary Number	Trinomial	Description
P-37-026505	CA-SDI-17401	Prehistoric occupation site, likely destroyed
P-37-035448	—	Historic two-story commercial building built ca. 1912
P-37-037130	—	Half-mile segment of historic Birmingham Drive (ca. 1911)
P-37-037131	—	Quarter-mile segment of historic San Elijo Avenue (pre-1948)

*This page is intentionally blank.*

## 6 Impact Assessment

### 6.1 Archaeological Resources

No archaeological resources were identified within the project APE.

### 6.2 Built Environment Resources

No built environment resources were identified within the project APE.

*This page is intentionally blank.*

## 7 Conclusion

This analysis confirms that no archaeological or built environment resources have the potential to be affected by the project as none are known to be present within the project APE. However, it is possible that unknown subsurface archaeological resources could be encountered. With implementation of Mitigation Measures CUL-1 through CUL-7 and PAL-1, which provides procedures to follow in the event of the discovery of archaeological and paleontological resources, impacts would be less than significant.

**MM CUL 1 Cultural Resources:** Due to the potential for uncovering unknown subsurface archaeological resources, including Native American tribal cultural resources, cultural resource mitigation monitoring shall be undertaken for any and all on-site and off-site ground disturbing activities. If on-site and/or off-site ground disturbing activities (e.g., exploratory trenching or excavations) are required for any informal or formal solicitation (written or spoken) of construction bids or similar requirements, all applicable requirements identified in mitigation measures CUL-2 to CUL-8 shall be undertaken by the applicant and/or owner.

**MM CUL-2 Cultural Resources:** A Cultural Resource Mitigation Monitoring Program shall be conducted to provide for the identification, evaluation, treatment, and protection of any cultural resources that are affected by or may be discovered during the construction of the proposed project. The monitoring shall consist of the full-time presence of a qualified archaeologist and a traditionally and culturally affiliated (TCA) Native American monitor from San Pasqual Band of Mission Indians for, but not limited to, all grading, clearing, grubbing, trenching, and construction activities; and related road improvements. Other tasks of the monitoring program shall include the following:

1. The requirement for cultural resource mitigation monitoring shall be noted on all applicable construction documents, including demolition plans, grading plans, etc.
2. The qualified archaeologist and TCA Native American monitor shall attend all applicable pre-construction meetings with the Contractor and/or associated Subcontractors.
3. The qualified archaeologist shall maintain ongoing collaborative consultation with the TCA Native American monitor during all ground disturbing or altering activities, as identified above.
4. The qualified archaeologist and/or TCA Native American monitor may halt ground disturbing activities if archaeological artifact deposits or cultural features are discovered. In general, ground disturbing activities shall be directed away from these deposits for a short time to allow a determination of potential significance, the subject of which shall be determined by the qualified archaeologist and the TCA Native American monitor, in consultation with the San Pasqual Band of Mission Indians ("San Pasqual Band"). Ground-disturbing activities shall not resume until the qualified archaeologist, in consultation with the TCA Native American monitor, deems the cultural resource or feature has been appropriately documented and/or protected. The cultural resource or feature shall remain in place on site or shall be repatriated to a designated 5 foot by 5 foot area on-site where Tribal Cultural resources will not be disturbed in consultation with the San Pasqual Band of Mission Indians. At the discretion of the qualified archaeologist's, the location of ground disturbing activities may be relocated elsewhere on the project site to avoid further disturbance of cultural resources.

5. The avoidance and protection of discovered unknown and significant cultural resources and/or unique archaeological resources is the preferable mitigation for the proposed project. If avoidance is not feasible a Data Recovery Plan may be authorized by the City as the lead agency under CEQA. If a data recovery is required, then the San Pasqual Band shall be notified and consulted in drafting and finalizing any such recovery plan. A copy of the recovery plan and the final data recovery survey report are to be provided to the Rincon Band of Luiseño Indians.
6. The qualified archaeologist and/or TCA Native American monitor may also halt ground disturbing activities around known archaeological artifact deposits or cultural features if, in their respective opinions, there is the possibility that they could be damaged or destroyed.

**MM CUL-3 Cultural Resources:** Prior to the issuance of a grading permit, and subject to approval of terms by the City, the applicant or owner, and/or contractor shall enter into a Pre-Excavation Agreement with the San Pasqual Band of Mission Indians. The purpose of this agreement shall be to formalize protocols and procedures between the applicant or owner, and/or contractor, and the San Pasqual Band for the protection and treatment of, but not limited to, such items as Native American human remains, funerary objects, cultural and religious landscapes, ceremonial items, traditional gathering areas and cultural items, located and/or discovered through the cultural resource mitigation monitoring program in conjunction with the construction of the proposed project, including additional archaeological surveys and/or studies, excavations, geotechnical investigations, soil surveys, grading, or any other ground disturbing activities.

**MM CUL-4 Cultural Resources:** Prior to the issuance of a grading permit, the applicant or owner, and/or contractor shall provide a written and signed letter to the City's Director of Development Services, stating that a City-approved qualified archaeologist and a TCA Native American monitor with the San Pasqual Band of Mission Indians have been retained at the applicant or owner and/or contractor's expense to implement the monitoring program, as described in the pre-excavation agreement. A copy of the letter shall be included in the grading plan submittals for the grading permit.

**MM CUL-5 Cultural Resources:** Prior to the issuance of a grading permit, and in order for potentially significant archaeological artifact deposits and/or cultural resources to be readily detected during mitigation monitoring, a written "Controlled Grade Procedure" shall be prepared by a qualified archaeologist, in consultation with the TCA Native American monitor, the San Pasqual Band, and the applicant or owner, subject to the approval of City representatives. The Controlled Grade Procedure shall establish requirements for any ground disturbing work with machinery occurring in and around areas the qualified archaeologist and TCA Native American monitor determine to be sensitive through the cultural resource mitigation monitoring process. The Controlled Grade Procedure shall include, but not be limited to, appropriate operating pace, increments of removal, weight and other characteristics of the earth disturbing equipment. A copy of the Controlled Grade Procedure shall be included in the grading plan submittals for the grading permit.

**MM CUL-6 Cultural Resources:** Prior to the release of the grading bond, a Monitoring Report and/or Evaluation Report, which describes the results, analysis and conclusions of the cultural resource mitigation monitoring efforts (such as, but not limited to, the Research Design and Data Recovery Program) shall be submitted by the qualified archaeologist, along with the TCA Native American monitor's notes and comments, to the City's Director of Development Services for approval. A copy of the final Monitoring Report and/or Evaluation Report is to be provided to the Rincon Band.



**MM CUL-7 Cultural Resources:** The landowner shall relinquish ownership of all tribal cultural resources collected during the cultural resource mitigation monitoring conducted during all ground disturbing activities, and from any previous archaeological studies or excavations on the project site to the San Pasqual Band for respectful and dignified treatment and disposition, including reburial onsite, in accordance with the Tribe's cultural and spiritual traditions. All cultural materials that are associated with burial and/or funerary goods will be repatriated to the Most Likely Descendant as determined by the Native American Heritage Commission per California Public Resources Code Section 5097.98.

**MM PAL-1 Paleontological Resources:** Prior to commencement of grading activities, the project contractor shall implement a paleontological monitoring and recovery program consisting of the following:

- a. The project contractor shall retain the services of a qualified paleontologist. A qualified paleontologist is defined as an individual having an M.S. or Ph.D. degree in paleontology or geology, and who is a recognized expert in the identification of fossil materials and the application of paleontological recovery procedures and techniques. A paleontological monitor is defined as an individual having experience in the collection and salvage of fossil materials. The paleontological monitor shall work under the direction of a qualified paleontologist.
- b. The qualified paleontologist shall attend the project pre-construction meeting to consult with the grading and excavation contractors concerning the grading plan and paleontological field techniques.
- c. The qualified paleontologist or paleontological monitor shall be on site on a full-time basis during the original cutting of previously undisturbed portions of the underlying Linda Vista, Torrey Sandstone or Del Mar formations. If the qualified paleontologist or paleontological monitor ascertains that the noted formations are not fossil-bearing, the qualified paleontologist shall have the authority to terminate the monitoring program.
- d. If fossils are discovered, recovery shall be conducted by the qualified paleontologist or paleontological monitor. In most cases, fossil salvage can be completed in a short period of time, although some fossil specimens (such as a complete large mammal skeleton) may require an extended salvage period. In these instances, the paleontologist (or paleontological monitor) shall have the authority to temporarily direct, divert, or halt grading to allow recovery of fossil remains in a timely manner.
- e. If subsurface bones or other potential fossils are found anywhere within the project site by construction personnel in the absence of a qualified paleontologist or paleontological monitor, the qualified paleontologist shall be notified immediately to assess their significance and make further recommendations.
- f. Fossil remains collected during monitoring and salvage shall be cleaned, sorted, and catalogued. Prepared fossils, along with copies of all pertinent field notes, photos, and maps, shall be deposited (as a donation) in a scientific institution with permanent paleontological collections such as the San Diego Natural History Museum.
- g. A final summary report outlining the results of the mitigation program shall be prepared by the qualified paleontologist and submitted to the City of Encinitas for concurrence. This report shall include discussions of the methods used, stratigraphic section(s) exposed, fossils collected, and significance of recovered fossils, as well as appropriate maps.

*This page is intentionally blank.*

## 8 References

Advisory Council on Historic Preservation (ACHP). 2013. Section 106 Regulations Summary, 4-18-2013. ACHP. Accessed on 10-14-2016. <http://www.achp.gov/106summary.html>.

*This page is intentionally blank.*

## Appendix A. Record Search Maps (CONFIDENTIAL)

*This page is intentionally blank.*