

**Creekside Assisted Living
Technical Appendices**

**Appendix D
Cultural Resources**



April 20, 2020

Sophia Hahl Mitchell
Sophia Mitchell & Associates
PO Box 1700
Gualala, CA 95445

Re: Cultural Resources Study for the Creekside Assisted Living Facility Project, San Marcos, San Diego County, California

Dear Ms. Mitchell,

This report presents the results of a cultural resources study conducted by ASM Affiliates, Inc. (ASM) for the recently proposed Creekside Assisted Living Facility Project (Project). The purpose of the archaeological investigation was to determine the presence or absence of cultural resources within the Project's area of potential effects (APE), as described below. This study was completed in compliance with the requirements of the California Environmental Quality Act (CEQA) and the City of San Marcos (City).

PROJECT DESCRIPTION AND LOCATION

The Creekside Assisted Living Facility Project is located on the northeast corner of the intersection of Mission Road and Twin Oaks Valley Road in the City of San Marcos, San Diego County, California. The Assessor's Parcel Numbers (APNs) for the Project site are 220-083-03 and 220-063-05. The applicant is requesting approval of a Site Development Plan (SDP) for the entire 3.7-acre site for the purpose of constructing an assisted living facility.

METHODS

A records search request of the archives at the South Coastal Information Center (SCIC), San Diego State University, of the California Historical Resources Information System (CHRIS) for San Diego County, was completed on February 24, 2020. The records search area encompasses the Project area and a search radius of one mile around it. The California Register of Historic Resources (CRHR) and the National Register of Historic Places (NRHP) were also examined to identify any previously recorded cultural resources within one mile of the Project area.

On March 5, 2020 a letter was sent to the California Native American Heritage Commission (NAHC) requesting a search of the Sacred Lands File (SLF) to identify any known areas of cultural concern, such as traditional cultural places, sacred sites, archaeological sites, or cultural landscapes that may exist within or within one mile of the originally proposed Project.

RECORDS SEARCH RESULTS

The results of the SCIC records search completed on February 24, 2020 are summarized below (Table 1). CHRIS records identified 75 previous reports that addressed areas within a one-mile radius of the Project area. Two of these reports indicate that previous cultural resources survey may have occurred within the Project area, as they address areas that intersect or overlap the Project area (Table 2). CHRIS records

indicate the presence of 17 previously recorded cultural resources outside of, but within a one-mile radius of the Project APE. Three historic addresses were identified as occurring within the one-mile records search radius (Table 3).

ASM received a response from the NAHC on March 12, 2020 stating that a search of the Sacred Lands File was negative. A list of Native American tribes that may have knowledge of cultural resources in the Project area was also provided by the NAHC. The NAHC response letter and list of Native American contacts is provided in Appendix A of this report. A Project notification letter was sent to each of the Native American contacts provided by the NAHC on March 18, 2020. At the time of the submittal of this report, three responses to the Project notification letter have been received, one from the Rincon Band of Luiseño Indians, one from the San Pasqual Band of Mission Indians, and one from the Pechanga band of Luiseño Indians. An example of the Project notification letter sent to each of the Native American contacts on the list provided by the NAHC and copies of the two responses received are included in Appendix B of this report.

Table 1. Summary of Records Search Results

SCIC Record Type	Within 1-mile of APE	Intersects with APE
Previous Reports	75	2
Historic Addresses	3	0
Cultural Resources	49	0

Table 2. Summary of Previous Reports Within a One-Mile Radius of the Project APE

SCIC File No.	NADB No.	Author(s)	Year	Title	Affiliation	Proximity to APE
SD-00017	1120017	Davis, McMillan and Susan M. Hector	1989	Cultural Resources Survey of the Malizia Property	RECON	Outside
SD-00039	1120039	Dominici, Debra A.	1983	Negative First Addendum Twin Oaks Valley Road 11-SD-78 P.M. 12.7-13.1 11209-147501	Caltrans	Outside
SD-00128	1120128	Archaeological Associates	1988	Archaeological Survey Report: The Twin Oaks Valley Ranch Project, City of San Marcos, CA.	Archaeological Associates, Ltd.	Outside
SD-00225	1120225	Carrico, Richard	1976	Archaeological Sensitivity and Potentiality Survey for Richland Neighborhood Study San Marcos, California.	WESTEC Services, Inc.	Outside
SD-00355	1120355	Carrico, Richard	1976	Suggested Mitigation for Archaeological Site SDi-749: Gateway San Marcos Project (SMTM 75-5).	WESTEC Services, Inc.	Outside
SD-00372	1120372	Bissell, Ronald M.	1986	Archaeological Reconnaissance of the San Marcos Creek Flood Channel Project, San Marcos, San Diego County, California	RMW Paleo Associates	Intersecting
SD-00684	1120684	Hector, Susan and Stephen Van Wormer	1985	Archaeology Survey of the Prohoroff Property San Marcos, California.	RECON	Outside

SD-01031	1121031	Gallegos, Dennis	1983	Archaeological Report for Business/Industrial, Richmar, Lake San Marcos and Barham/Discovery Community Plan, San Marcos, California	WESTEC Services, Inc.	Outside
SD-01732	1121732	Padon, Beth and Steve Van Wormer	1987	Cultural/Scientific Resources for the San Diego State University North County Center Master Plan San Diego County, California	LSA Associates, Inc.	Outside
SD-02043	1122043	Michael Brandman Associates, Inc.	1989	Draft Environmental Impact Report San Marcos Flood Control Channel San Marcos Creek/Las Posas Reach SCH #88061505	Michael Brandman Associates, Inc.	Outside
SD-02246	1122246	Roth, Linda	1991	Cultural Resources Survey San Marcos Town Center 59.2 Acres San Marcos, California	Roth and Associates	Outside
SD-02322	1122322	Huey, Danielle	1992	Historical - Archaeological Survey Report for Four Land Parcels Near High- Way 78, San Marcos, CA	Gallegos and Associates	Outside
SD-02368	1122368	Wade, Sue	1992	Cultural Resource Reconnaissance for University Center Businesspark, City of San Marcos	RECON	Outside
SD-02373	1122373	Gallegos, Dennis	1992	Historical / Archaeological Survey for the Proposed Kaiser Permanente Medical Center	Gallegos and Associates	Outside
SD-02622	1122622	Bissell, Ronald M.	1991	Cultural Resource Reconnaissance in Support of Proposed Flood Control Improvements to San Marcos Creek Within the City of San Diego, California	RMW Paleo Associates	Outside
SD-02946	1122946	Kyle, Carolyn E., Roxana Phillips, And Dennis R. Gallegos	1994	Cultural Resource Survey and Test Report for State Route 78 and Twin Oaks Valley Road Interchange, City of San Marcos, San Diego County, California	Gallegos & Associates	Outside
SD-02948	1122948	Strudwick, Ivan H., Dennis R. Gallegos, And Roxana Phillips	1994	Historical/Archaeological Test Report for Sites Ca-Sdi-12510/H, Ca-Sdi-12592/H and Ca-Sdi-12596-H, San Marcos, California	Gallegos & Associates	Outside
SD-03821	1123821	Ghabhlain, Sinead Ni, Tracy Stropes, And Dennis R. Gallegos	1999	Cultural Resource Evaluation Report for the Oceanside-Escondido Bikeway Project San Marcos, California	Gallegos & Associates	Outside
SD-04105	1124105	Theodore Cooley	1991	Cultural Resource Testing of CA-SDI-12095 Oceanside to Escondido Rail Project, San Marcos Loop Segment, San Marcos, California	ERC Environmental and Energy Services Company (ERCE)	Outside
SD-04107	1124107	Dicken Everson	1990	Cultural Resources Assessment San Marcos Seventh-Day Adventist Church (TSM 359/Cup 90-100) San Marcos, San Diego County	Archaeological Research Unit, University of CA, Riverside	Outside

SD-04108	1124108	Andrew Pignolo	1990	Cultural Resource Survey of the Palomar Heights Projects, San Marcos, California	ERC Environmental and Energy Services Company	Outside
SD-04494	1124494	Freeman, Trevor	1988	Archaeological Survey Report: The Twin Oaks Valley Ranch Project, City of San Marcos, CA	Trevor Freeman	Outside
SD-04526	1124526	Casen, George and Daniel M. Saunders	1992	State Route 78 Interchange Improvements at Las Posas Road and San Marcos Boulevard	Parsons Brinkerhoff Quade & Douglas, Inc.	Outside
SD-04652	1124652	Gallegos And Associates	2001	Cultural Resource Test Report For Oceanside - Escondido Rail Project, Oceanside, California	Gallegos & Associates	Outside
SD-04744	1124744	Bissell, Ronald M.	1986	Archaeological Reconnaissance of the San Marcos Creek Flood Channel Projects, San Marcos, San Diego County, California	RMW Paleo Associates	Outside
SD-04783	1124783	Roth, Linda	1991	Cultural Resources Survey, San Marcos Town Center	Roth and Associates	Outside
SD-06174	1126174	Gallegos, Dennis R., Larry Tiff, and Sinead Ni Ghabhlain	2000	Cultural Resource Survey Report for a Portion of the San Marcos Creek Flood Channel, San Marcos, California	Gallegos & Associates	Outside
SD-06249	1126249	ERCE	1990	Cultural Resource Survey of the Oceanside to Escondido Rail Project, San Marcos Loop Segment, San Marcos, California	ERC	Outside
SD-06622	1126622	Harris, Nina M., Larry Tiff, and Dennis Gallegos	1999	Cultural Resource Survey Report for the Mission Cove Property, San Marcos, California	Gallegos & Associates	Outside
SD-07729	1127729	Foster, Daniel G. and Mark Thornton	2000	Management Plan For CDF's Historic Buildings and Archaeological Sites	CDF	Outside
SD-07751	1127751	Thornton, Mark V.	1994	A Survey and Historic Significance Evaluation of the CDF Building Inventory	Mark Thornton	Outside
SD-07768	1127768	Michael W. Tuma	2001	Cultural Resources Survey for the Rose Ranch Project, San Marcos, California	Michael W. Tuma	Outside
SD-07790	1127790	Smith, Brian and Kevin Hunt	2000	Cultural Resource Survey for the San Marcos 9-Acre Project	Brian F. Smith & Associates	Outside
SD-08308	1128308	Guerrero, Kyle and Brian F. Smith	2003	Cultural Resources Survey and Evaluation Program for the Forecast Homes Project	Brian F. Smith & Associates	Outside
SD-08760	1128760	Bull, Charles S.	1976	An Archaeological Survey of Bright Skies Mobile Estates	RECON	Outside
SD-09041	1129041	Kyle, Carolyn	2002	Cultural Resource Assessment for Cingular Wireless Facility SD849-01, San Diego County, California	Kyle Consulting	Outside
SD-09243	1129243	Pierson, Larry J.	2004	Archaeological Monitoring and Resource Evaluation Program for the Forecast Project	Brian F. Smith & Associates	Outside

SD-09503	1129503	Robbins-Wade, Mary	2005	University Place Due Diligence - Archaeological Survey (Affinis Job #2020)	Affinis Environmental	Outside
SD-09546	1129546	Guerrero, Monica, Gallegos, Dennis, Stropes, Tracy, Bouscaren, Steve, Bugbee, Susan, and Cerreto, Richard	2001	Cultural Resource Test Report for Oceanside-Escondido Rail Project Oceanside, California	Gallegos & Associates	Outside
SD-09555	1129555	Guerrero, Monica	2002	Cultural Resource Survey for the Creekside Marketplace and Adjacent Retail Project San Marcos, California	Gallegos & Associates	Outside
SD-09611	1129611	Robbins-Wade, Mary	2005	Archaeological Resources Inventory For Southern Hills Pointe, Poway, San Diego County, California	Affinis	Outside
SD-10243	1130243	Bonner, Wayne H. and Sarah A. Williams	2006	Cultural Resource Records Search and Site Visit Results for Cricket Telecommunications Facility Candidate SAN-206 (Bolts 4 U), 201 Trade Street, San Marcos, San Diego County, California	Michael Brandman Associates	Outside
SD-10261	1130261	Bonner, Wayne H. and Mamie Aislin Kay	2006	Cultural Resource Records Search and Site Visit Results for Cricket Telecommunications Facility Candidate SAN-207B (KRC Rock), 700-740 North Twin Oaks Valley Road, San Marcos, San Diego County, California	Michael Brandman Associates	Outside
SD-10398	1130398	Rosen, Martin D.	2006	Historic Property Survey Report (HPSR) State Route 78, Woodland Parkway Interchange Project	EDAW, Inc.	Outside
SD-10551	1130551	Arrington, Cindy	2006	Cultural Resources Final Report Of Monitoring And Findings for the Qwest Network Construction Project, State of California	SWCA Environmental Consultants	Outside
SD-11154	1131154	Laylander, Don	2007	An Archaeological Evaluation Of Prehistoric Site Ca-Sdi-17423 for the San Marcos Creek Project, City of San Marcos, California	ASM Affiliates, Inc.	Outside
SD-11444	1131444	Bonner, Wayne H. and James M. Keasling	2007	Cultural Resource Records Search and Site Visit Results for T-Mobile Facility Candidate SD06587 (Fitzpatrick Palm), 501 Fitzpatrick Road, San Marcos, San Diego County, California	Michael Brandman Associates	Outside
SD-11743	1131743	Wright, Gail	2004	Cultural Resources Survey Report for: TPM 20800	County of San Diego - Department of Planning and Land Use	Outside
SD-12025	1132025	Guerrero, Monica, Larry Tift, and Dennis R. Gallegos	2005	Cultural Resource Survey for the Grand Avenue Bridge Project, San Marcos, California	Gallegos & Associates	Outside

SD-12039	1132039	Guerrero, Monica and Dennis R. Gallegos	2007	Cultural Resources Monitoring Report for the North County Transit District (NCTD) Sprinter Rail Project Oceanside to Escondido, California	Gallegos & Associates	Outside
SD-12271	1132271	Robbins-Wade, Mary	2009	Archaeological Resources Study, Barham Rough Grading Project, San Marcos, San Diego County, California	Affinis	Outside
SD-12335	1132335	McKenna, Jeanette A.	2009	Historic American Building Survey: San Marcos Historical Society, 270 W. San Marcos Blvd. San Marcos, San Diego County, California 92069	McKenna et al.	Outside
SD-12336	1132336	McKenna, Jeanette A.	2009	Historic American Building Survey: San Marcos Elementary School, 300 W. San Marcos Blvd. San Marcos, San Diego County, California 92069	McKenna et al.	Outside
SD-12391	1132391	Clowery-Moreno, Sara, Larry J. Pierson, and Brian F. Smith	2008	A Phase I Archaeological Assessment of the Fitzpatrick Condominiums Project	Brian F. Smith & Associates	Outside
SD-12834	1132834	Robbins-Wade, Mary	2010	Barham Rough Grading Project Archaeological Monitoring	Affinis	Outside
SD-13212	1133212	Hector, Susan	2011	Authorization for the San Marcos South Lake Park Master Plan Project, City of San Marcos, San Diego County, California	ASM Affiliates	Outside
SD-13222	1133222	U.S. Army Corps of Engineers	2011	Section 404 Authorization for the San Marcos South Lake Park Master Plan Project, City of San Marcos (File No. SPL-2009-00040-MLM), San Diego County, California	U.S. Army Corps of Engineers	Outside
SD-13437	1133437	Robbins-Wade, Mary	2012	Westlake Village- Archaeological Monitoring	Affinis Environmental Services	Outside
SD-13495	1133495	Giacinto, Adam	2011	Cultural Resource Study For The UOMP Project, San Diego County, California	ASM Affiliates	Outside
SD-14041	1134041	Davis, Shannon, Jennifer Kintz, Michael P. Pumphrey, and Sinead Ni Ghabhlain	2011	Treatment Plan for 918 Discovery St. in Anticipation of Relocation, San Marcos, California	ASM Affiliates	Outside
SD-14098	1134098	Laylander, Don And Sinead Ni Ghabhlain	2009	A Cultural Resources Survey for the University District Project City of San Marcos, California	ASM Affiliates	Outside
SD-14140	1134140	Robbins-Wade, Mary	2003	Archaeological Records Search and Literature Review, Vallecitos Water District Master Plan Update, San Diego County, California	Affinis	Outside
SD-14581	1134581	ASM Affiliates	2012	Section 106 Consultation for the San Marcos Sewer Interceptor Project	ASM Affiliates	Outside

SD-14702	1134702	Comeau, Brad and Micah Hale	2012	Cultural Resources Survey Report for the Palomar Station Project, San Marcos, San Diego County, California	ASM Affiliates	Outside
SD-15426	1135426	Hannah Haas and Robert Ramirez	2013	Archaeological Monitoring for the Park View Apartments Project, San Marcos, San Diego County, California	Rincon Consultants	Outside
SD-15439	1135439	Brian F. Smith	2015	Phase I Cultural Resource Survey for the Woodward Street Senior Housing Project, City of San Marcos, California	Brian F. Smith and Associates	Outside
SD-15671	1135671	Brian F. Smith	2015	Phase I Cultural Resource Survey for the Woodward Street Senior Housing Project, City of San Marcos, California	Brian F. Smith and Associates	Outside
SD-16539	1136539	Wright, Catherine A.	2016	Archaeological Monitoring for the Richmar Park Project, San Marcos, San Diego County, California	RECON	Outside
SD-16556	1136556	Gorman, Jennifer, Castells, Shelby, and Ghabhlain, Sinead Ni	2014	Historic Resources Evaluation Report for Commercial Buildings At 304 And 312 Mission Road, San Marcos, California	ASM Affiliates	Outside
SD-16748	1136748	Gunderman Castells, Shelby, Quach, Tony, And Becker, Mark S.	2017	Archaeological Monitoring and Significance Evaluation of an Archaeological Discovery for the Mission 316 Project, San Marcos, San Diego County, California	ASM Affiliates	Outside
SD-17030	1137030	Smith, Brian F.	2017	Cultural Resources Monitoring Report for the Woodward Street Senior Housing Project, City of San Marcos, California (APN 218-120-31)	Brian F. Smith and Associates	Outside
SD-17207	1137207	Castells, Shelby Gunderman	2014	Cultural Resources Study For The Corner@2Oaks Project, San Marcos, San Diego County, California	ASM Affiliates	Outside
SD-17208	1137208	Castells, Shelby Gunderman	2017	Negative Cultural Resources Monitoring Report for the Corner@2Oaks Project, San Marcos, California	ASM Affiliates	Outside
SD-18020	1138020	Dietterich, James	2017	Archaeological Survey Report CSU San Marcos / SD0233 / FA 10546488, Northwest Corner of Craven Road and Campus View Drive, San Marcos, San Diego County, California, 92078, Not Part Of PLSS	EBI Consulting	Outside
SD-18087	1138087	Ni Ghabhlain, Sinead	2011	Updated Cultural Resources Study for the San Marcos Creek Specific Plan Area, San Marcos, California	ASM Affiliates	Intersecting

Table 3. Summary of Cultural Resources Within a One-Mile Radius of the Project APE

Primary No. P-37-	Trinomial No. CA-SDI-	Recorder and Updates	Description	Proximity to APE
P-37-000560	CA-SDI-000560	True (No date)	AP2. Lithic Scatter	Outside
P-37-000749	CA-SDI-000749	True (1959)	AP2. Lithic Scatter with shell	Outside
P-37-005583	CA-SDI-005583	Varner (1978)	AP2. Lithic Scatter	Outside
P-37-005632	CA-SDI-005632	Franklin (1977), Briggs, Stoneburner, and Robbins-Wade (2012)	AP4. Bedrock Milling Feature, AP2. Lithic Scatter with Shell	Outside
P-37-005642	CA-SDI-005642	Varner and Thorp (1978)	AP2. Lithic Scatter	Outside
P-37-005643	CA-SDI-005643	Varner and Thorp (1978)	AP2. Lithic Scatter	Outside
P-37-005644	CA-SDI-005644	Varner and Thorp (1978)	AP2. Lithic Scatter	Outside
P-37-005645	CA-SDI-005645	Varner and Thorp (1978)	AP2. Lithic Scatter	Outside
P-37-005646	CA-SDI-005646	Varner and Thorp (1978)	AP2. Lithic Scatter	Outside
P-37-008720	CA-SDI-008720	Bissell (1991), Carillo and Price (1981), Gunderman (2011)	AP4. Bedrock Milling Feature	Outside
P-37-011661	CA-SDI-011661	Crull and Kelley (1990)	AP2. Lithic Scatter	Outside
P-37-011662	CA-SDI-011662	Smith and Whitemarsh ((1990)	AP.14 Rock Shelter AP4. Bedrock Milling Feature	Outside
P-37-011715	CA-SDI-011715	Pigniolo, Baker, and Page (1990)	AP.12 Quarry AP2. Lithic Scatter	Outside
P-37-011716	CA-SDI-011716H	Pigniolo, Baker, and Page (1990)	AH.2 Foundations AH.4 Trash scatter	Outside
P-37-012095	CA-SDI-012095	Pigniolo and Rader (1991)	AP2. Lithic Scatter	Outside
P-37-012096	CA-SDI-012096	Briggs and Pigniolo (1991)	AP2. Lithic Scatter AH4. Trash scatter	Outside
P-37-012097	CA-SDI-012097	Briggs and Pigniolo (1991), James, Briggs, and Cooley (1996)	AP4. Bedrock Milling Feature	Outside
P-37-012098	CA-SDI-012098	Bissell (1991), Briggs and Pigniolo (1991)	AP2. Lithic Scatter	Outside
P-37-012210	CA-SDI-012210	Joyner (1990)	AP2. Lithic Scatter	Outside
P-37-012592	CA-SDI-012592H	Huey and Baker (1992)	AP2. Lithic Scatter AP4. Bedrock Milling Feature AH4. Trash scatter	Outside
P-37-012593	CA-SDI-012593H	Huey and Baker (1992)	AP2. Lithic Scatter AP4. Bedrock Milling Feature AH4. Trash scatter	Outside
P-37-012594	CA-SDI-012594H	Huey and Baker (1992)	AH4. Trash scatter	Outside
P-37-012595	CA-SDI-012595	Huey and Baker (1992)	AP2. Lithic Scatter AP4. Bedrock Milling Feature AH4. Trash scatter	Outside
P-37-012596	CA-SDI-012596H	Huey and Baker (1992)	AH4. Trash scatter	Outside

P-37-013742	Prehistoric Isolate	Roth and Associates (1994)	3 Flakes, 1 Hand Stone	Outside
P-37-013745	Mapped Homestead Location	Roth and Associates (1994)	No extant historic remains.	Outside
P-37-013746	Historic Residence	Roth and Associates (1994)	AH15. Standing Structures	Outside
P-37-014081	Historic Structures	Thornton (1994)	AH15. CDF Fire Station	Outside
P-37-014950	Prehistoric Isolate	Crull and Kelley (1990)	Lithic Core Tool	Outside
P-37-015064	Prehistoric Isolate	Saunders (1991)	Hand Stone	Outside
P-37-015578	Prehistoric Isolate	James, Bark, and Cooley (1996)	Hand Stone	Outside
P-37-015579	Prehistoric Isolate	James, Bark, and Cooley (1996)	Hand Stone	Outside
P-37-015595	CA-SDI-014340	James, Bark, Glenn, Sabio, and Cooley (1996)	AP2. Lithic Scatter, AP4. Bedrock milling feature, AP15. Habitation debris	Outside
P-37-024911	CA-SDI-016492	Brian F. Smith and Associates (2003)	AP2. Lithic Scatter	Outside
P-37-025556	CA-SDI-016971	Brian F. Smith and Associates (2003)	AP4. Bedrock milling feature	Outside
P-37-027375	CA-SDI-017896	Pham, Colston, Lefevre, Murillo, and Hadel (2017), Tift and Hovland (2005)	AP4. Bedrock milling feature	Outside
P-37-027377	CA-SDI-017898	Pham, Colston, Lefevre, Murillo, and Hadel (2017), Tift and Hovland (2005)	AH2. Foundations/structure pads	Outside
P-37-030379	Historic Isolate	ASM Affiliates (2008)	AH2. Foundations/structure pads AH6. Water conveyance system	Outside
P-37-030380	Historic Isolate	ASM Affiliates (2008)	AH2. Foundations/structure pads	Outside
P-37-030654	CA-SDI-019473	ASM Affiliates (2011), Affinis (2006)	AP2. Lithic Scatter	Outside
P-37-030655	CA-SDI-019474	ASM Affiliates (2011), Affinis (2006)	AP2. Lithic Scatter	Outside
P-37-030656	CA-SDI-019475	Affinis (2006)	AP2. Lithic Scatter	Outside
P-37-030657	Prehistoric Isolate	Affinis (2006)	Debitage	Outside
P-37-030745	CA-SDI-019524	Affinis (2009)	AP2. Lithic Scatter AP3. Ceramic scatter	Outside
P-37-033844	CA-SDI-021254	Quach and Stringer-Bowsher, (2014); Castells, Piek, and DeCarlo (2015)	AH2. Structure Remains and AP15. Habitation Debris	Outside
P-37-035439	Prehistoric Isolate	Blake and Tsunoda (2015)	Debitage	Outside
P-37-036140	Historic Structure	ASM Affiliates (2014)	HP6. Commercial Building (Mr. Taco)	Outside
P-37-036141	Historic Structure	ASM Affiliates (2014)	HP6. Commercial Building (Buelow Building)	Outside
P-37-036501	CA-SDI-022095	Pham, Lefevre, and Murillo (2017)	AH2. Foundation/structure pad	Outside

Summary of Sites Occurring within One Mile of the Project APE

The archaeological sites that occur within a one-mile radius of the Project APE consist predominantly of prehistoric resources. Many of these prehistoric sites contain bedrock milling components and many are associated with lithic scatters. Two sites were recorded as containing habitation debris, indicating a more intensive prehistoric use of those locations. In general, most of these sites were disturbed or destroyed by modern activities and were originally characterized by relatively sparse surficial, as well as sparse and relatively shallow subsurface deposits. Some historic structures, remnants of historic foundations and historic debris scatters also occur infrequently within a one-mile radius of the Project APE.

ARCHAEOLOGICAL SURVEY RESULTS

The Project APE was surveyed by ASM Senior Archaeologist Stephen Harvey and Donovan Pati, a Native American monitor from Saving Sacred Sites on April 13, 2020. The project APE is relatively flat and slopes gently to the south. It is bounded to the north by a small retail complex at Richmar Avenue, to the west by Twin Oaks Valley Road, to the south by Mission Road, and to the east by San Marcos Creek. The majority of the ground surface in the Project APE was obscured by vegetation at the time of the survey, primarily invasive grasses and weeds. Ground surface visibility was limited to relatively small, discontinuous patches of bare soil and areas of rodent burrowing scattered throughout the APE, and a graded path approximately ten feet wide running along the western boundary of the Project APE. All areas of exposed soil were intensively examined for cultural resources during the survey. Soils are sandy silts with imported gravel in some areas. Modern debris, including glass and plastic fragments, cans, bottles, paper and discarded lumber was observed, primarily in the northern portion of the Project APE. No prehistoric or historic cultural material was identified, and the survey provided no evidence for the presence of cultural resources within the Project APE. As previously noted, the majority of the Project APE is covered with dense vegetation, and the vegetation density effectively prevented ground surface visibility in those portions of the Project APE during the pedestrian survey. Therefore, it is possible that cultural materials are present on the ground surface within the Project APE that were not visible during the survey.

CONCLUSIONS AND RECOMMENDATIONS

No cultural resources were identified during the archaeological survey of the Project APE and there would be no significant impacts associated with the implementation of the Creekside Assisted Living Facility Project. Although the likelihood of subsurface deposits is low, construction monitoring by a qualified archaeologist and Native American monitor is recommended for ground disturbing activities during the Project construction phase. This recommendation is based on the poor ground surface visibility and the potential for surficial or buried cultural material within the proposed Project APE that may not have been identified during the archaeological survey. Once construction excavation has exposed soil to a sufficient depth that precludes the potential for cultural resources, typically >1 meter, or depths at which paleontological resources may be present, ASM recommends cessation of the recommended cultural monitoring. If you have any questions or comments regarding the information provided in this report, please do not hesitate to contact me.

Sincerely,



Stephen Harvey, M.A., RPA
Senior Archaeologist

ATTACHMENTS:

- Figure 1. Regional Project location map.
- Figure 2. Project APE and one-mile records search buffer on the 7.5' USGS San Marcos Quad map.
- Figure 3. Creekside Assisted Living Facility site map.
- Figure 4. Overview of Project APE, view to southwest.
- Figure 5. Closeup of vegetation density in the central portion of the Project APE.

APPENDICES:

- Appendix A: Native American Heritage Commission Response Letter
- Appendix B: Example Native American Project Notification Letter and Responses

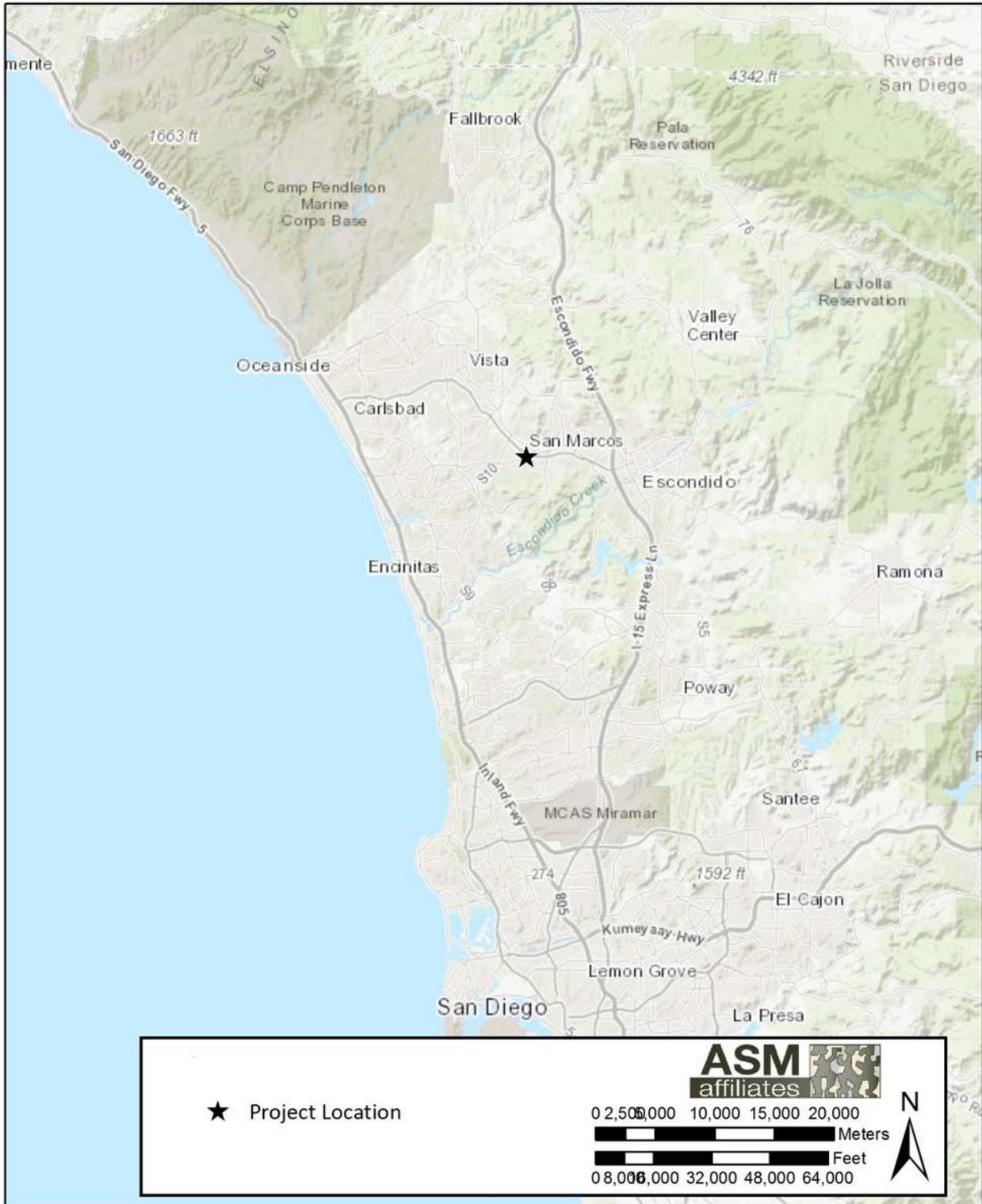


Figure 1. Regional Project location map.

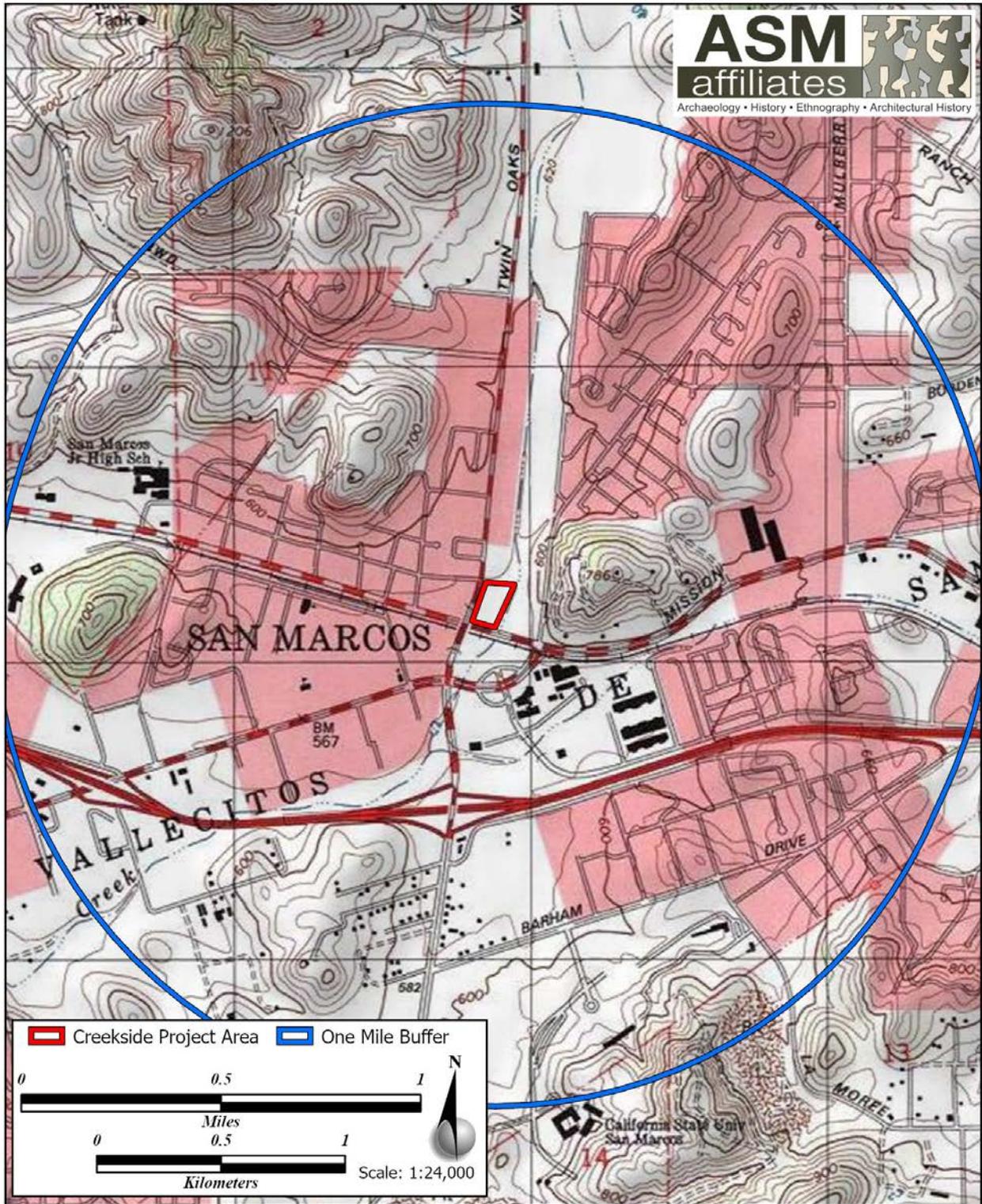


Figure 2. Project APE and one-mile records search buffer on the 7.5' USGS San Marcos Quad map.



Figure 4. Overview of Project APE, view to southwest.



Figure 5. Closeup of vegetation density in the central portion of the Project APE.

APPENDICES

APPENDIX A
Native American Heritage Commission Response Letter

NATIVE AMERICAN HERITAGE COMMISSION

March 12, 2020

Steve Harvey
ASM Affiliates

Via Email to: sharvey@asmaffiliates.com

Re: Creekside Assisted Living Facility Project, San Diego County

Dear Mr. Harvey:

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

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

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

If you have any questions or need additional information, please contact me at my email address: steven.quinn@nahc.ca.gov.

Sincerely,



Steven Quinn
Cultural Resources Analyst

Attachment



CHAIRPERSON
Laura Miranda
Luiseño

VICE CHAIRPERSON
Reginald Pagaling
Chumash

SECRETARY
Merri Lopez-Keifer
Luiseño

PARLIAMENTARIAN
Russell Attebery
Karuk

COMMISSIONER
Marshall McKay
Wintun

COMMISSIONER
William Mungary
Paiute/White Mountain
Apache

COMMISSIONER
Joseph Myers
Pomo

COMMISSIONER
Julie Tumamait-Stenslie
Chumash

COMMISSIONER
[Vacant]

EXECUTIVE SECRETARY
Christina Snider
Pomo

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

**Native American Heritage Commission
Native American Contact List
San Diego County
3/12/2020**

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Campo Band of Diegueno Mission Indians

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36190 Church Road, Suite 1 Diegueno
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rgoff@campo-nsn.gov

Ewiiapaayp Band of Kumeyaay Indians

Robert Pinto, Chairperson
4054 Willows Road Diegueno
Alpine, CA, 91901
Phone: (619) 445 - 6315
Fax: (619) 445-9126
wmicklin@leaningrock.net

Ewiiapaayp Band of Kumeyaay Indians

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Iipay Nation of Santa Ysabel

Virgil Perez, Chairperson
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Fax: (760) 765-0320

Iipay Nation of Santa Ysabel

Clint Linton, Director of Cultural Resources
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cjlinton73@aol.com

Inaja-Cosmit Band of Indians

Rebecca Osuna, Chairperson
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Escondido, CA, 92025
Phone: (760) 737 - 7628
Fax: (760) 747-8568

Jamul Indian Village

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epinto@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 Jolla Band of Luiseno Indians

Fred Nelson, Chairperson
22000 Highway 76 Luiseno
Pauma Valley, CA, 92061
Phone: (760) 742 - 3771

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
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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 Creekside Assisted Living Facility Project, San Diego County.

**Native American Heritage Commission
Native American Contact List
San Diego County
3/12/2020**

**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

**Pechanga Band of Luiseno
Indians**

Paul Macarro, Cultural Resources
Coordinator Luiseno
P.O. Box 1477
Temecula, CA, 92593
Phone: (951) 770 - 6306
Fax: (951) 506-9491
pmacarro@pechanga-nsn.gov

**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

Rincon Band of Luiseno Indians

Bo Mazzetti, Chairperson Luiseno
One Government Center Lane
Valley Center, CA, 92082
Phone: (760) 749 - 1051
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bomazzetti@aol.com

Pala Band of Mission Indians

Shasta Gaughen, Tribal Historic
Preservation Officer
PMB 50, 35008 Pala Temecula Cupeno
Rd. Luiseno
Pala, CA, 92059
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Fax: (760) 742-3189
sgaughen@palatribe.com

Rincon Band of Luiseno Indians

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Pauma Band of Luiseno Indians

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P.O. Box 369 Luiseno
Pauma Valley, CA, 92061
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**San Luis Rey Band of Mission
Indians**

San Luis Rey, Tribal Council Luiseno
1889 Sunset Drive
Vista, CA, 92081
Phone: (760) 724 - 8505
Fax: (760) 724-2172
cjmojado@slrmissionindians.org

**Pechanga Band of Luiseno
Indians**

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P.O. Box 1477 Luiseno
Temecula, CA, 92593
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epreston@pechanga-nsn.gov

**San Luis Rey Band of Mission
Indians**

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Phone: (760) 724 - 8505
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cjmojado@slrmissionindians.org

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**Native American Heritage Commission
Native American Contact List
San Diego County
3/12/2020**

**San Pasqual Band of Diegueno
Mission Indians**

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johnf@sanpasqualtribe.org

**Sycuan Band of the Kumeyaay
Nation**

Kristie Orosco, Kumeyaay
Resource Specialist
1 Kwaaypaay Court Kumeyaay
El Cajon, CA, 92019
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**San Pasqual Band of Diegueno
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**Viejas Band of Kumeyaay
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epingleton@viejas-nsn.gov

**Soboba Band of Luiseno
Indians**

Joseph Ontiveros, Cultural
Resource Department
P.O. BOX 487 Cahuilla
San Jacinto, CA, 92581 Luiseno
Phone: (951) 663 - 5279
Fax: (951) 654-4198
jontiveros@soboba-nsn.gov

**Viejas Band of Kumeyaay
Indians**

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**Soboba Band of Luiseno
Indians**

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San Jacinto, CA, 92583 Luiseno
Phone: (951) 654 - 2765
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jontiveros@soboba-nsn.gov

**Sycuan Band of the Kumeyaay
Nation**

Cody Martinez, Chairperson
1 Kwaaypaay Court Kumeyaay
El Cajon, CA, 92019
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Fax: (619) 445-1927
ssilva@sycuan-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.

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APPENDIX B

Example Native American Project Notification Letter and Responses



March 18, 2020

La Posta Band of Mission Indians
Gwendolyn Parada, Chairperson
8 Crestwood Road
Boulevard, CA 91905

Re: Cultural Resources Study for the Creekside Assisted Living Facility Project, San Marcos, San Diego County, California

Dear Ms. Parada,

ASM Affiliates is currently conducting a cultural resources study for the Creekside Assisted Living Facility Project. The Project is located on the east side of Twin Oaks Valley Road between Richmar Avenue and Mission Road in the City of San Marcos (Figure 1). The applicant is requesting approval of a Site Development Plan (SDP) for the currently undeveloped 3.7-acre site for the purpose of constructing an assisted living facility. The Assessor's Parcel Numbers for the Project are 220-083-03 and 220-063-05. This study is being undertaken in compliance with the California Environmental Quality Act (CEQA) and the City of San Marcos.

ASM has completed a records search of the California Historic Resources Information System records at the South Coastal Information Center for the Project area. No cultural resources have been previously recorded within the proposed Project area. A records search of the Native American Heritage Commission's Sacred Lands File had negative results.

We are contacting you to find out if you are aware of any issues of cultural concern regarding the area shown on the enclosed map. In particular, we would like to know if you have knowledge of any Tribal Cultural Resources, Traditional Cultural Properties, Sacred Sites, resource collecting areas, or any other areas of concern of which you wish us to be aware. We understand the need for confidentiality in these matters.

If you have any questions or concerns regarding the proposed Project, consultations are being conducted by the City of San Marcos. We appreciate any input you may have on the Project and understand that consultation is a private and ongoing process. Again, any information you provide will remain confidential.

Sincerely,

A handwritten signature in black ink, appearing to read 'Stephen Harvey', written in a cursive style.

Stephen Harvey, M.A., RPA
sharvey@asmaffiliates.com
Senior Archaeologist

Figure 1. Project Location shown on the USGS San Marcos 7.5' Quad map.

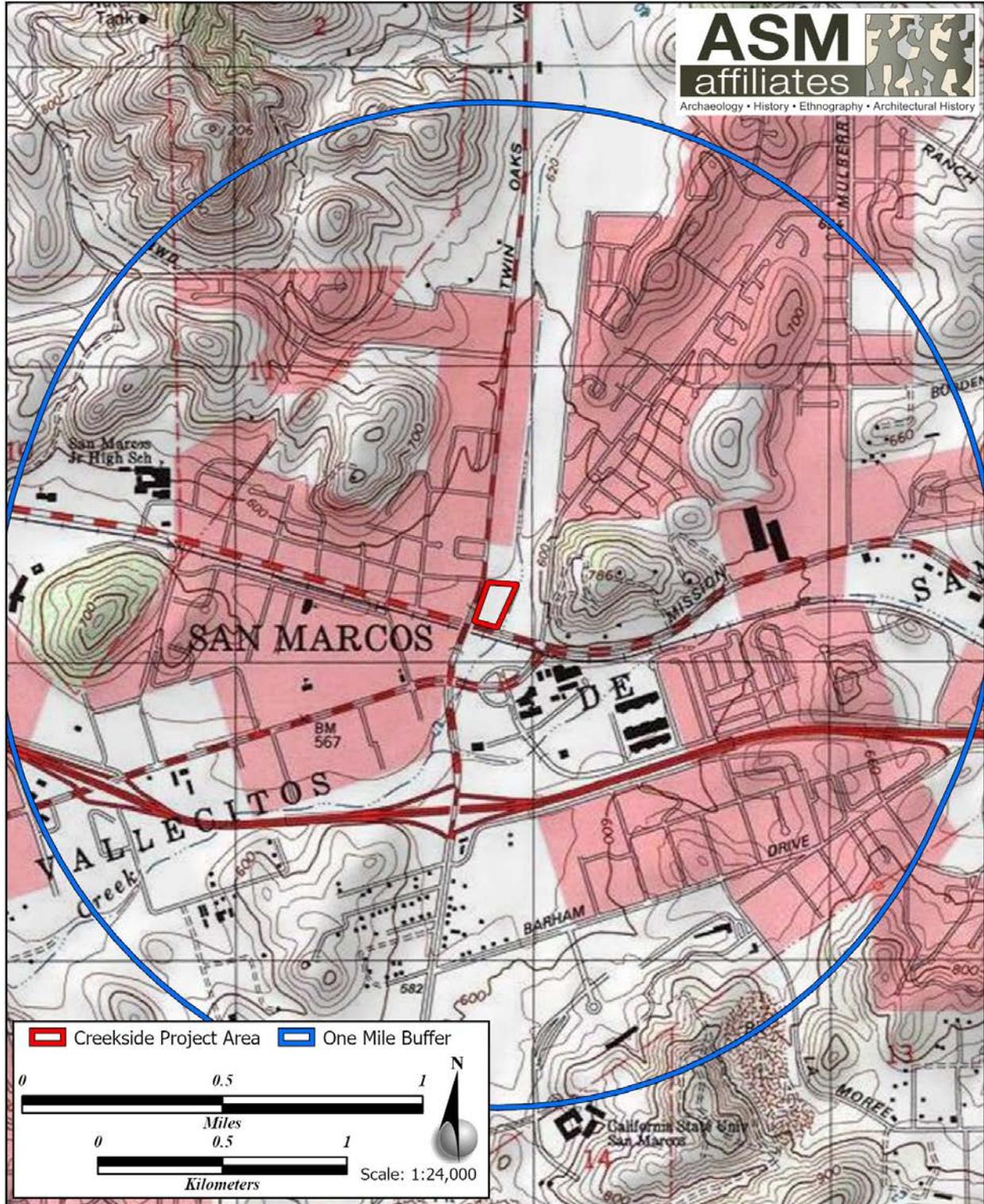


Figure 1. Project Location shown on the USGS San Marcos 7.5' Quad map.



SAN PASQUAL BAND OF MISSION INDIANS

SAN PASQUAL RESERVATION

TRIBAL COUNCIL

Stephen W. Cope
Chairman

Justin Quis Quis
Vice Chairman

Fidda M. Green
Secretary-Treasurer

David L. Toler
Councilman

Joe Chavez
Councilman

March 29, 2020,

ASM
Stephen Harvey, M.A., RPA
2034 Corte Del Nogal
Carlsbad CA 92011

RE: Creekside Assisted Living Facility

Dear Mr. Harvey,

The San Pasqual Band of Mission Indians Tribal Historic Preservation Office has received your notification of the project referenced above. This letter constitutes our response on behalf of David L. Toler THPO Officer.

We have consulted our maps and determined that the project as described is not within the boundaries of the recognized San Pasqual Indian Reservation. It is, however, within the boundaries of the territory that the tribe considers its Traditional Use Area (TUA). Therefore, we request to be kept in the information loop as the project progresses and would appreciate being maintained on the receiving list for project updates, reports of investigations, and /or any documentation that might be generated regarding previously reported or newly discovered sites. Further, we may recommend archaeological pending the results of site surveys and records searches associated with the project. If the project boundaries are modified to extend beyond the currently proposed limits, we request updated information and the opportunity to respond to your changes.

If you also need a Certified Kumeyaay Monitor San Pasqual Band of Mission Indians can Provide this service for this project. We appreciate involvement with your initiative and look forward to working with you on future efforts. If you have questions or need additional information, please do not hesitate to contact me by telephone 760-651-5142 or by e-mail at THPO@sanpasqualtribe.org.

Sincerely,

Angelina Gutierrez
Tribal Historic Preservation Office, Monitor Supervisor
San Pasqual Band of Mission Indians

Rincon Band of Luiseño Indians

CULTURAL RESOURCES DEPARTMENT

One Government Center Lane | Valley Center | CA 92082
(760) 749-1051 | Fax: (760) 749-8901 | rincon-nsn.gov



April 1, 2020

Sent via email to: sharvey@asmaffiliates.com

ASM Affiliates
Steve Harvey
2034 Corte Del Nogal
Carlsbad, CA 92011

Re: Creekside Assisted Living Facility Project, San Marcos, San Diego County

Dear Mr. Harvey,

This letter is written on behalf of the Rincon Band of Luiseño Indians. We have received your notification regarding the above referenced project and we thank you for the opportunity to provide information pertaining to cultural resources. The identified location is within the Territory of the Luiseño people, and is also within Rincon's specific area of Historic interest.

Embedded in the Luiseño territory are Rincon's history, culture and identity. We have knowledge of a Luiseño place name within a one-mile radius of the proposed project area. We recommend that an archaeological record search be conducted and ask that a copy of the results be provided to the Rincon Band.

The Band thanks ASM Affiliates for submitting this project for Tribal review.

If you have additional questions or concerns, please do not hesitate to contact our office at your convenience at (760) 297-2635 or via electronic mail at cmadrigan@rincon-nsn.gov. We look forward to working together to protect and preserve our cultural assets.

Sincerely,

Cheryl Madrigal
Tribal Historic Preservation Officer
Cultural Resources Manager

Steve Harvey

From: Ebru Ozdil <eozdil@pechanga-nsn.gov>
Sent: Monday, April 20, 2020 1:58 PM
To: Steve Harvey
Cc: Tina Thompson Mendoza; Juan Ochoa; Andrea Fernandez
Subject: Pechanga Tribe Scoping Response for Creekside Assisted Living Facility Project

RE: Request for Information for the Creekside Assisted Living Facility Project in the City of San Marcos, CA.

Dear Mr. Harvey,

The Pechanga Band of Luiseño Indians (“the Tribe”) appreciates your request for information regarding the above referenced Project. Please accept this email letter as our official scoping response for the above named project. After reviewing the provided maps and our internal documents, we have determined that the Project area is not within reservation lands although it is within our ancestral territory

Based on our cultural knowledge of the Project area, the Tribe requests to be involved in the Creekside Assisted Living Facility Project. After reviewing the historic aerials, the Tribe understands that the Project area has been vacant and looks like it in natural state other than some existing trails. Because of the sensitivity of the area, including the presence of waterway and previously recoded cultural sites, as well as known placenames in near vicinity, the Tribe believes that both archaeological and Tribal monitors would be required to be present during all earthmoving activities. Furthermore, the Tribe would like to discuss avoidance and preservation of any cultural resources that may be identified during the survey. Also, if you have not conducted the survey, Luiseño monitor should accompany you when it occurs.

The Tribe is dedicated to providing comprehensive cultural information to you and your firm for inclusion in the archaeological study as well as to the Lead Agency for CEQA review. At this time, the Tribe requests the following so we may continue the consultation process and to provide adequate and appropriate recommendations for the Project:

- 1) Notification once the Project begins the entitlement process, if it has not already;
- 2) Copies of all applicable archaeological reports, site records, proposed grading plans and environmental documents (EA/IS/MND/EIR, etc.);
- 3) Government-to-government consultation with the Lead Agency; and
- 4) The Tribe believes that monitoring by a Riverside County qualified archaeologist and a professional Luiseño monitor will be required during earthmoving activities. Therefore, the Tribe reserves its right to make additional comments and recommendations once the environmental documents have been received and fully reviewed. Further, in the event that subsurface cultural resources are identified, the Tribe requests consultation with the Project proponent and Lead Agency regarding the treatment and disposition of all artifacts.

As a sovereign governmental entity, the Tribe is entitled to appropriate and adequate government-to-government consultation regarding the proposed Project. We would like you and your client to know that the Tribe does not consider initial inquiry letters from project consultants to constitute appropriate government-to-government consultation, but rather tools to obtain further information about the Project area. Therefore, the Tribe reserves its rights to participate in the formal environmental review process, including government-to-government consultation with the Lead Agency, and requests to be included in all correspondence regarding this Project.

Please do not hesitate to contact me if you have any questions.

Thank you,

*Ebru T. Ozdil
Cultural Analyst
Pechanga Band of Mission Indians
P.O. Box 2183
Temecula, CA 92593*

*Office: (951)-770-6313
Fax: (951)-693-2314
eozdil@pechanga-nsn.gov*

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