

## MEMORANDUM

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**To:** Robert Dmohowski, City of Oceanside  
**From:** Angela Pham, MA, RPA  
**Subject:** Cultural Resources Impact for the Multi-Building and Truck Bay Reduction Alternative Project– City of Oceanside, California  
**Date:** July 26, 2024  
**cc:** Vanessa Scheidel, Dudek  
**Attachment(s):** Figure 1. Project Location Map and Figure 2. APE Map

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This letter summarizes a review of potential cultural resource impacts of the Multi-Building and Truck Bay Reduction Alternative Project (Project), located in the City of Oceanside, California. The Project consists of four (4) separate buildings on-site for a total building square footage of 497,822 SF (inclusive of mezzanine Area of Potential Effects (APEs)). The total alternative Project footprint would be 491,582 SF, including 40,651 sf of office (ancillary) use, 334,275 sf of warehouse uses, and 122,896 sf of manufacturing uses. The total building APE for building 1 would be 109,660 SF, the total building APE for building 2 would be 132,600 SF, the total building APE for building 3 would be 121,547 SF, and the total building APE for building 4 would be 134,015 SF. Each of the 4 buildings under this alternative would include 7% office space, 68% warehouse space, and 25% manufacturing space. This Multi-Building and Truck Bay Reduction Alternative would include 56 dock-high doors (for semi-truck use), 45 grade-level doors (for smaller delivery truck use), and 593 parking stalls which include 22 ADA stalls and 90 EV stalls. The total alternative Project is approximately 30.12-acre; 1.58 acres smaller than the original 31.7-acre Project APE.

Dudek conducted a cultural resources inventory for the original 31.7-acre Project APE (Murillo and Pham 2023) (Figures 1 & 2). The original inventory was conducted in compliance with the California Environmental Quality Act (CEQA) and was reviewed by the City of Oceanside as lead agency. The 2023 study of the original Project included a review of archival records, Native American outreach, and pedestrian survey.

## Cultural Resources Inventory Results

Dudek requested a records search from the South Coastal Information Center (SCIC) for the original Project APE and a one-mile buffer on February 2, 2022 (Murillo and Pham 2023). The record search identified ninety-seven (97) previous cultural resources studies that have been performed within one-mile of the Project APE. Seven of these previous studies intersect the current Project APE. Approximately 65% of the Project has been previously

studied. The SCIC records search also revealed that no cultural resources have been recorded within the original Project site; the closest resource, consisting of a multicomponent site, is located 150 meters from the original Project APE. As no previously recorded resources were identified within the original Project Site, no previously recorded resources were identified within Multi-Building and Truck Bay Reduction Alternative Project APE.

In addition to the SCIC records search, Dudek conducted an on-line review of historic aerial photographs of the original Project APE and general vicinity. The review of the historic aerial images demonstrates there are no archaeological resources located within the Multi-Building and Truck Bay Reduction Alternative Project APE (Murillo and Pham 2023). Historic age structures are located within the APE; however, these are considered built environment resources and are addressed in a separate built environment study.

Dudek requested a Native American Heritage Commission (NAHC) search of the Sacred Lands File (SLF) on February 4, 2021, for the original Project APE and 1-mile (Murillo and Pham 2023). The NAHC reported that the SLF results were positive, however, NAHC did not specify if cultural resources intersect the Project APE or not. NAHC recommended to contact the La Jolla Band of Mission Indians and the San Luis Rey Band of Mission Indians for more information. The NAHC additionally provided a list of Native American tribes and individuals/organizations with traditional geographic associations that might have knowledge of cultural resources in the area. Outreach letters to the Native American contacts provided by the NAHC were mailed March 25, 2022 to all Native American group representatives included on the NAHC contact list (Appendix B). These letters attempted to solicit additional information relating to Native American resources that may be impacted by the project (Murillo and Pham 2023).

Dudek contacted the La Jolla Band of Mission Indians via telephone and email and have been awaiting their response. The San Luis Rey Band of Mission Indians recommended having a qualified archaeologist and Luiseño Native American monitor to conduct monitoring during construction. The Viejas Band of Kumeyaay Indians responded with requesting a Kumeyaay Cultural monitor to be on site during all ground disturbance. The Pechanga Band of Indians responded requesting to be notified about the Project process, copies of all archaeological documentation, consultation with Lead Agency, and to have a qualified archaeologist and Tribal monitor on site during all earthmoving activities. The Rincon Band of Luiseño Indians responded recommending a cultural resources study, record search, to have a Tribal monitor from the Rincon Band accompany the archaeologist during the survey (Murillo and Pham 2023).

In compliance with Assembly Bill 52, the City, as lead agency, is responsible for conducting government to government consultation with pertinent tribal entities.

Dudek archaeologist conducted a pedestrian survey of the original Project APE on February 11, 2022 (Murillo and Pham 2023). A Saving Sacred Sites Native American monitor participated in the survey. The original Project APE has been entirely disturbed and developed. Dense vegetation and existing industrial buildings, foundations, and structures obscure ground visibility. Visibility of the ground surface was fair (25-50%) in undeveloped portions of the Project APE where vegetation was dense, while the developed portions of the project were completely obstructed by buildings, foundations, and dense vegetation (e.g., grass, brush, and trees). No cultural resources were identified during the pedestrian survey of the Project APE. Built environment resources were observed within the APE and these are addressed in a separate built environment study.

## Management Considerations

Dudek’s Phase I cultural resources inventory of the Project indicates that there is low sensitivity for identifying intact subsurface archaeological deposits during Project implementation. The SCIC records search did not identify any resources within the Project APE, the review of historic aerials showed extensive grading and disturbance to the Project APE, and the pedestrian survey did not identify any cultural resources within the Project APE.

In consideration of the negative results of the SCIC records search, archival research, and intensive-level survey, no further archaeological efforts or mitigation, including archeological construction monitoring, are recommended to be necessary in support of implementation of the Project.

### Unanticipated Discovery of Archaeological Resources

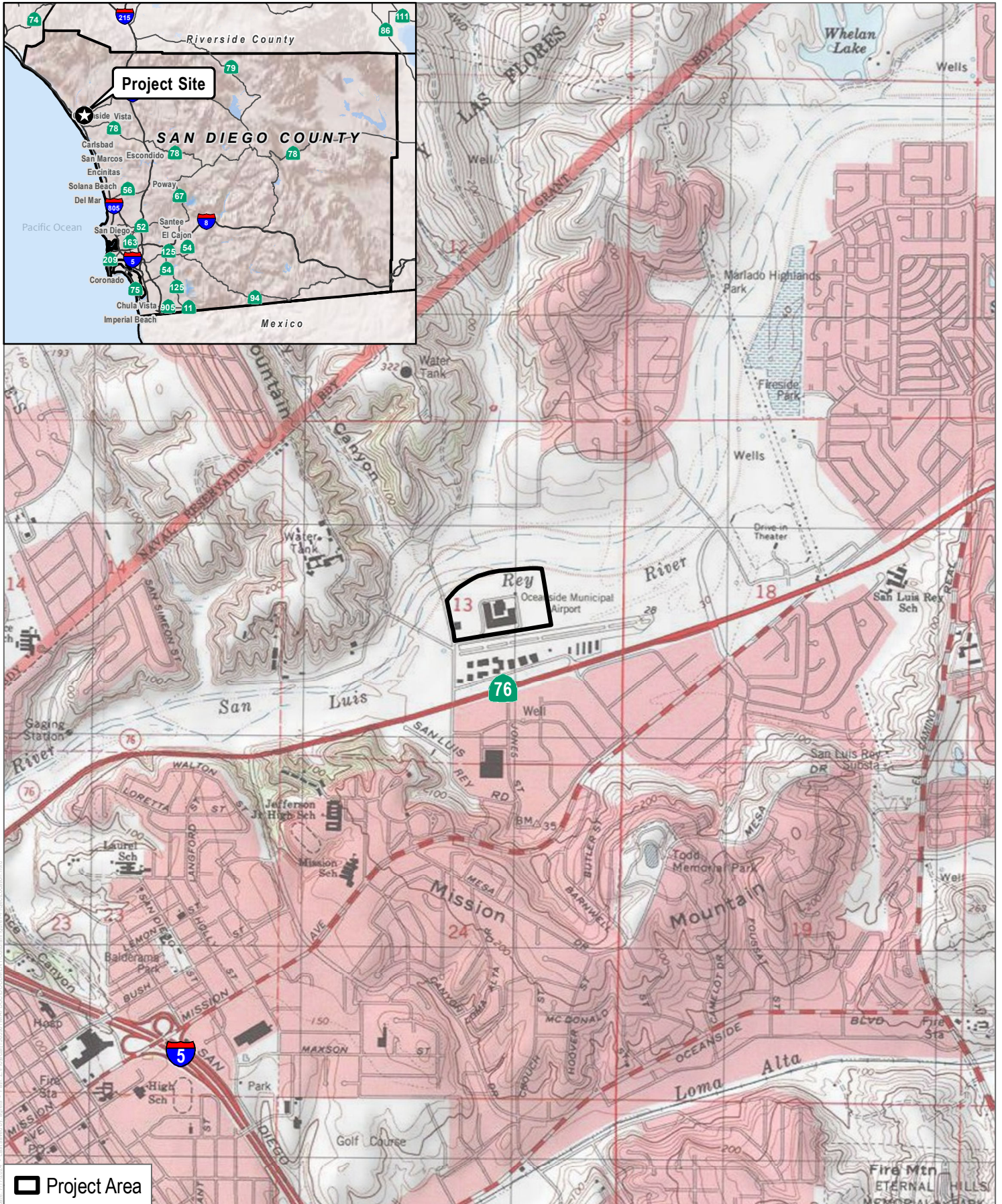
In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the Project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist meeting the Secretary of the Interior’s Professional Qualification Standards can evaluate the significance of the find. Construction activities may continue in other areas, but should be redirected a safe distance from the find. If the new discovery is evaluated and found to be significant under CEQA and avoidance is not feasible, additional work such as data recovery may be warranted. In such an event, a data recovery plan should be developed by the qualified archaeologist in consultation with the City and Native American representatives, if applicable. Ground disturbing work can continue in the area of the find only after impacts to the resources have been mitigated and with City approval.

### Unanticipated Discovery of Human Remains

In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the County Coroner shall be immediately notified of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the NAHC in Sacramento within 24 hours. In accordance with California Public Resources Code Section 5097.98, the NAHC must immediately notify the person or persons it believes to be the MLD from the deceased Native American. The MLD shall complete inspection within 48 hours of being granted access to the site and make recommendations for the treatment and disposition, in consultation with the property owner, of the human remains.

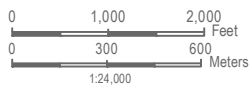
## References

Murillo, Makayla and Angela Pham, 2023. *Negative Cultural Resources Phase I Inventory Report for the Eddie Jones Industrial Way Project, Oceanside, California.*



SOURCE: USGS 7.5-Minute San Luis Rey Quadrangle  
Township 11S / Range 5W / Section 13

**DUDEK**



**FIGURE 1**

**Project Location**

Eddy Jones Way Industrial



 Project Area

SOURCE: SANGIS 2023, 2024



**FIGURE 2**  
**Area of Potential Effects**  
 Eddy Jones Way Industrial