Appendix D

Cultural Resources Inventory Report

Cultural Resources Inventory Report

Olive Park Apartments Project, City of Oceanside, California

APRIL 2024

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
ADI	area of direct impact
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
City	City of Oceanside
CHRIS	California Historical Resources Information System
CRHR	California Register of Historical Resources
DPR	Department of Parks and Recreation
MLD	most likely descendent
MM	mitigation measure
NAHC	Native American Heritage Commission
NRHP	National Register of Historic Places
NRHP	North County Transit District
PEIR	Program Environmental Impact Report
PRC	California Public Resources Code
Project	Olive Park Apartments Project
SDSU	San Diego State University
SCIC	South Coastal Information Center
SLF	Sacred Lands File
USGS	United States Geological Survey

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National Archaeological Database (NADB) Information

Authors:	Makayla Murillo, BA; Angie Pham, MA, RPA, Keshia Montifolca, MA, RPA, and Micah Hale, PhD, RPA
Firm:	Dudek
Project Proponent:	Capstone Equities, Los Angeles, California
Report Date:	April 2024
Report Title:	Cultural Resources Inventory Report for the Olive Park Apartments Project, City of Oceanside, California
Type of Study:	Cultural Resources Inventory
Resources:	CA-SDI-10445/P-37-010445; CA-SDI-10446/P-37-010446
USGS Quads:	San Luis Rey; Township 11S; Range 4 West; Sections 21 and 22
Acreage:	43.50 Acres; Area of Direct Impact: 11.64 Acres
Permit Numbers:	N/A
Keywords:	San Luis Rey River; Luiseño; intensive pedestrian survey; previously undeveloped; residential development; Olive Park Apartments; prehistoric; cultural resource; positive; CA-SDI-10445/P-37-010445; CA-SDI-10446/P-37-010446; prehistoric habitation; prehistoric campsite; not significant under CEQA

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Management Summary

This report presents the results of a cultural resources inventory performed by Dudek for the Olive Park Apartments Project (project). The project consists of a residential development in the Mira Costa Neighborhood Area of the City of Oceanside, California. The overall property is generally located south of Oceanside Boulevard and west of College Boulevard; more specifically, west of the terminus of Olive Drive and south of the North County Transit District (NCTD) rail line and College Boulevard Station. The project falls on Sections 21 and 22, Township 11 South, Range 4 West of the 7.5-minute San Luis Rey U.S. Geological Survey (USGS) Geological Survey Quadrangle map. The Parcel Area encompasses 43.50 acres of a vacant parcel (APN 162-111-04), and the total area of direct impact (ADI) consists of the development of 11.64 acres within the Parcel Area and off-site areas. The area outside of the ADI would be designated as open space and would be placed in a conservation easement.

The City of Oceanside (City) is the lead agency responsible for compliance with the California Environmental Quality Act (CEQA) for the project. Dudek performed a cultural resources inventory for the entire Parcel Area even though only a portion will be developed for the project.

This study included the following components: a California Historical Resources Information System (CHRIS) records search for the Parcel Area and a 1.0-mile radius; background research including a review of relevant literature and environmental documents; a review of historical maps and aerial photographs of the Parcel Area and vicinity; results of the Native American Heritage Commission (NAHC) for a Sacred Lands File (SLF) search; an intensive-level pedestrian survey of the Parcel Area for cultural resources; assessment of the potential for the Parcel Area a to contain cultural resources and what, if any, constraints they may pose to potential project development; summary of findings; and management recommendations.

The South Coastal Information Center (SCIC) identified 17 previously recorded cultural resources within 1.0-mile of the Parcel Area. Of the 17 previously recorded cultural resources, two cultural resources, CA-SDI-10445 (prehistoric habitation site) and CA-SDI-10446 (prehistoric campsite), are located within the Parcel Area. CA-SDI-10446 is located within the ADI and would be directly impacted by project implementation. CA-SDI-10445 would be avoided by the project and left in open space. Both resources have been previously evaluated for significance under CEQA and determined to not be significant archaeological resources under CEQA (Gallegos and Pigniolo 1986).

A NAHC SLF search was requested on February 12, 2024 and positive results were received on February 13, 2024, however, the response does not provide details on what the resource(s) are or where they are located. Outreach letters to the tribes were mailed on February 14, 2024. One response from the Rincon Band of Luiseño Indians was received. No other responses from the tribes have been received to date. Any additional responses received will be included in the final draft of this report.

Dudek conducted an intensive cultural pedestrian survey of the entire Parcel Area on February 23, 2024. During the survey, the two previously recorded resources, CA-SDI-10445 and CA-SDI-10446, were revisited and cultural material were identified within the previously recorded boundaries for both resources. CA-SDI-10446 is located within the ADI and would be directly impacted by project implementation whereas CA-SDI-10445 would be avoided by the project and left in open space.

Due to the known presence of cultural resources, CA-SDI-10445 and CA-SDI-10446, within the Parcel Area, the presence of Loma Alta Creek located within the northwestern section of the Parcel Area, presence of alluvial soils

which are suited to contain subsurface archaeological deposits, and the number of known cultural resources within close proximity of the Parcel Area, there is a high potential for encountering subsurface cultural resources during project implementation. Dudek recommends that an archaeological monitor and a Luiseño Native American monitor are present full-time during initial ground disturbance of the Parcel Area. Should cultural resources or subsurface cultural deposits be identified, monitoring may need to be increased, as determined by the archaeologist, the monitoring Tribe, and the City. If disturbed sediments (e.g., fill) or other sediments and formations are identified during monitoring that do not have the potential to contain cultural resources, then monitoring may be reduced or terminated.

1 Project Description and Location

The Olive Park Apartments Project (project) proposes a residential development and open space in the Mira Costa Neighborhood Area of the City of Oceanside, California. The overall property is generally located south of Oceanside Boulevard and west of College Boulevard; more specifically, west of the terminus of Olive Drive and south of the North County Transit District (NCTD) rail line and College Boulevard Station. The project falls on Sections 21 and 22, Township 11 South, Range 4 West of the 7.5-minute San Luis Rey USGS Geological Survey Quadrangle map (Figure 1). The project proposes development of the previously disturbed, approximately 10.87-acre portion (area of direct impact [ADI]) of a vacant parcel (APN 162-111-04) that covers approximately 43.50 acres (Parcel Area), located east of Interstate-5, south of Oceanside Boulevard and the NCTD Sprinter rail line, west of College Boulevard, and north of the State Route 78 (SR-78) (Figure 2).

The project proposes to rely on density bonus law to develop a maximum of 260 multi-family residential units (Option A) with an option to build 287 dwelling units (Option B) with a different unit mix. All the dwelling units would be affordable to low, very-low, and extremely low income households with one to three bedroom/two bath units. Access to the site would be provided via Olive Drive, at the eastern side of the Parcel Area. An emergency access only entry/exit to the project would be provided adjacent to the NCTD rail line. The development would comply with the minimum parking standards for a 100% affordable project. The proposed project will voluntarily provide approximately 356 parking spaces regardless of whether Option A or Option B is developed. The project development would include two separate residential buildings that may be developed in one or two phases. The proposed project would also include an open space area that will be maintained and managed by the project that will include an all-weather accessible pedestrian/bicycle connection for the project and neighboring residents to the adjacent Sprinter station.

The City of Oceanside (City) is the lead agency responsible for compliance with the California Environmental Quality Act (CEQA) for the current project.

1.1 Area of Direct Impact

The Parcel Area covers 43.50 acres of a vacant parcel on Assessor's Parcel Number (APN 162-111-04) and is bounded by the NCTD Sprinter rail line to the north, open space to the west, and residential development to the east and south. The total area of ADI covers approximately 11.64 acres of the Parcel Area, including the net developable pad, total impact area onsite inclusive of any manufactured slopes, and off-site impact areas. Only the northeastern 10.87-acre portion of the Parcel Area, constitutes the area of disturbance, with the remainder being left as open space and would be placed in a conservation easement (Figure 2). The development is centered on the lowest portion of the property in the northeastern corner of the Parcel Area. The Parcel Area consists of vacant and undeveloped land with various dirt roads traversing the site.

Specifically, the project proposes development on a portion of an adjacent parcel (APN 162-241-05) that covers approximately 4.73 acres (i.e., Off-site Parcel Area 1) and development on a portion of another adjacent parcel (APN 162-111-03) that covers approximately 6.33 acres (i.e., Off-site Parcel Area 2).

Off-site Parcel Area 1 and Off-site Parcel Area 2 are generally located south of Oceanside Boulevard and west of College Boulevard; more specifically, to the north and northeast of the Parcel Area and includes the North County

Transit District (NCTD) rail line both to the west (Off-site Parcel Area 1) and east (Off-site Parcel Area 2) of the College Boulevard Sprinter Station.

In Off-site Parcel area 1, the project proposes to provide secondary emergency vehicle access through improvements to the existing service road from College Blvd that extends from the northeast corner of the Parcel Area to College Boulevard along the south side of the rail line. The existing service road that currently extends through the Parcel Area will be improved from an existing dirt path to a 20-foot-wide paved two-lane roadway with curbs, gutters, security gates, emergency lighting and storm drains with necessary storage.

In Off-site Parcel area 2, the project proposes to develop an all-weather accessible pedestrian/bicycle connection walkway from the Parcel Area to the adjacent Sprinter Station through the existing station platform connections.

NCTD staff has conducted multiple design reviews on the proposed Offsite Improvements for the project and is supportive of both the proposed Offsite Improvements and the proposed easement for the project's use of the secondary emergency vehicle access road.

1.2 Regulatory Context

This project is subject to state and local regulations regarding cultural resources. The following section provides a summary of the applicable regulations, policies, and guidelines relating to the proper management of cultural resources for this project.

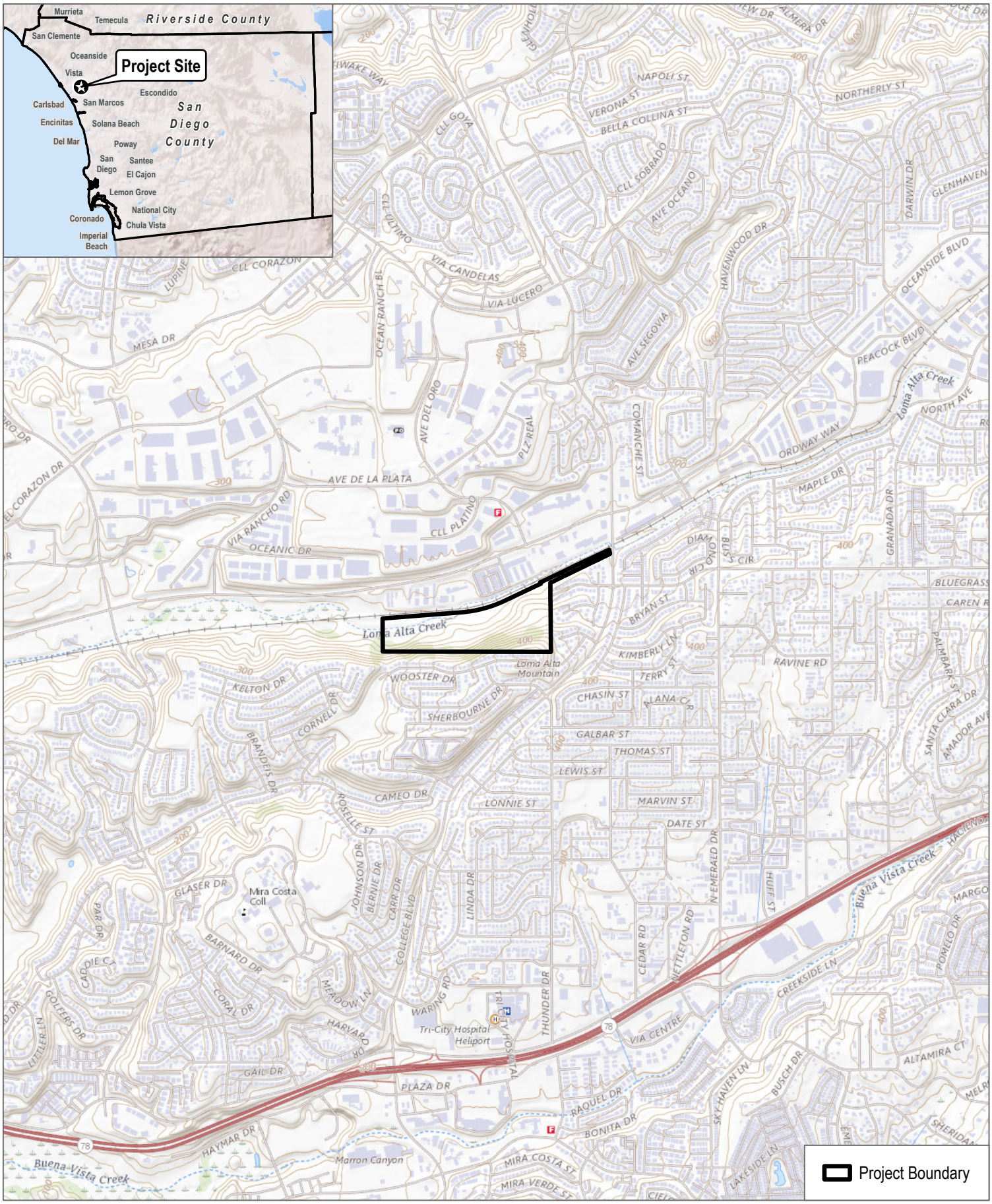
1.2.1 California Register of Historical Resources

In California, per the California Public Resources Code (PRC) the term "cultural resource" includes "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" (PRC Section 5020.1(j)). In 1992, the California legislature established the California Register of Historical Resources (CRHR) "to be used by state and local agencies, private groups, and citizens to identify the state's cultural resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC Section 5024.1(a)). A resource is eligible for listing in the CRHR if the State Cultural Resources Commission determines that it is a significant resource and that it meets any of the following criteria (PRC Section 5024.1(c)):

1. Associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. 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.

Per the California Code of Regulations (CCR), resources less than 50 years old are not considered for listing in the CRHR but may be considered if it can be demonstrated that sufficient time has passed to understand the historical importance of the resource (see 14 CCR, Section 4852(d)(2)).

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the National Register of Historic Places (NRHP),



SOURCE: USGS National Map 2024

San Luis Rey Quadrangle - Township 11S Range 4W Section 21, 22

DUDEK

0 500 1,000 Feet

FIGURE 1

Project Location

Olive Park Apartments

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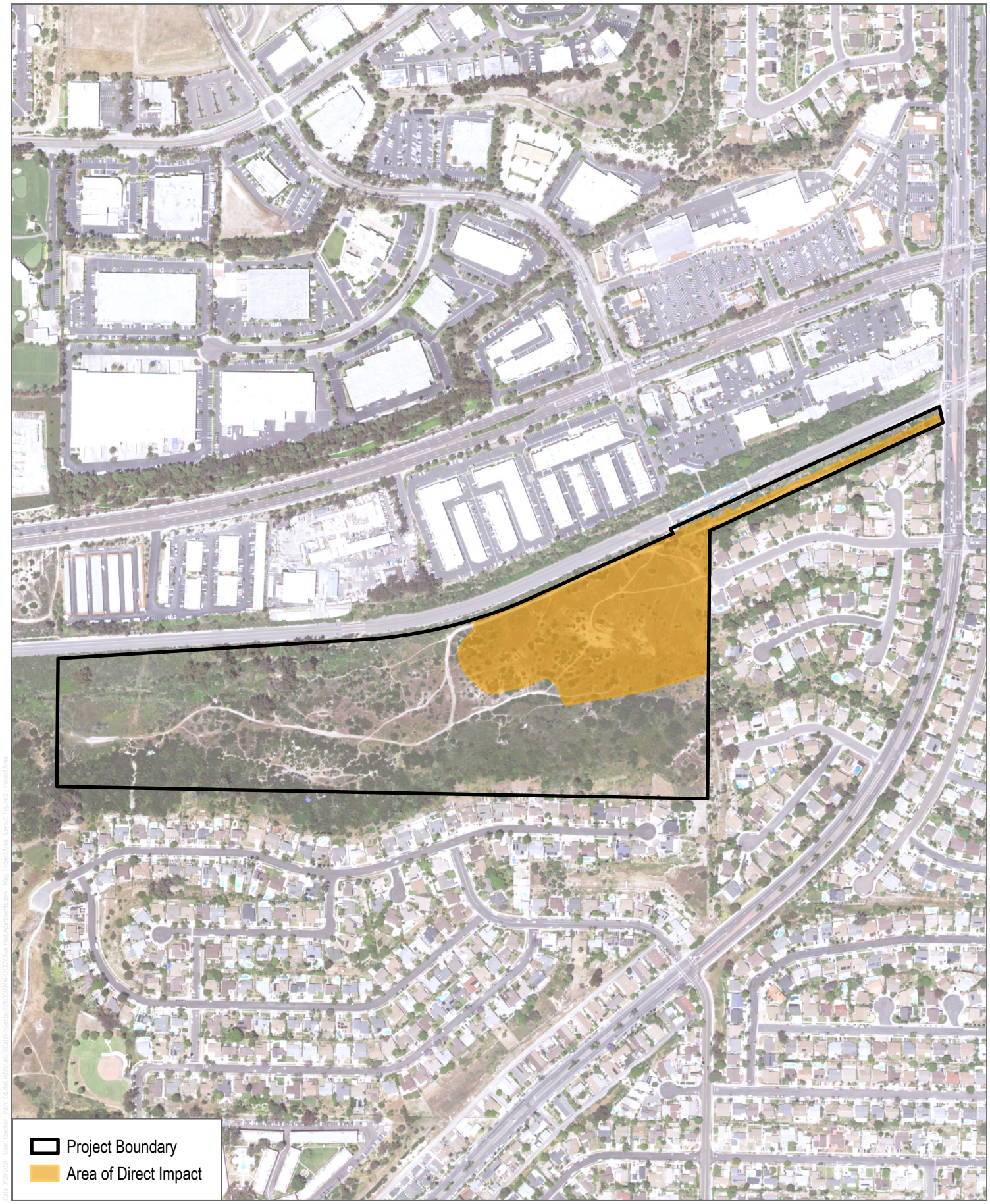

SOURCE: NAIP 2020

DUDEK

0 255 510 Feet

FIGURE 2

Parcel Area

Olive Park Apartments

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1.2.4 California Environmental Quality Act

As described further below, the following CEQA statutes and CEQA Guidelines (14 CCR 15000 et seq.) are of relevance to the analysis of archaeological, historic, and tribal cultural resources:

- PRC Section 21083.2(g) defines "unique archaeological resource."
- PRC 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 an historical resource.
- PRC Section 21074(a) defines "tribal cultural resources."
- PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e): Set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated ceremony.
- PRC Sections 21083.2(b)-(c) and CEQA Guidelines Section 15126.4: Provide information regarding the mitigation framework for archaeological and historic resources, including examples of preservation-in-place mitigation measures; preservation-in-place is the preferred manner of mitigating impacts to significant archaeological sites because it maintains the relationship between artifacts and the archaeological context, and may also help avoid conflict with religious or cultural values of groups associated with the archaeological site(s).

More specifically, 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" (PRC Section 21084.1; CEQA Guidelines Section 15064.5(b)). If a site is either listed or eligible for listing in the CRHR, or if it is included in a local register of historic resources or identified as significant in a historical resources survey (meeting the requirements of PRC Section 5024.1(q)), it is a "historical resource" and is presumed to be historically or culturally significant for purposes of CEQA (PRC 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 (PRC Section 21084.1; CEQA Guidelines Section 15064.5(a)).

A "substantial adverse change in the significance of an historical resource" reflecting a significant effect under CEQA means "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); PRC Section 5020.1(q)). In turn, the significance of an historical resource is materially impaired when a project (CEQA Guidelines Section 15064.5(b)(2)):

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 PRC or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the PRC, 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.

Pursuant to these sections, the CEQA inquiry begins with evaluating whether a project site contains any "historical resources," then evaluates 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. If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that they cannot be left undisturbed, mitigation measures are required (Section 21083.2[a], [b], and [c]).

1.2.5 California Health and Safety Code Section 7050.5

CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. As described below, the procedures are detailed in California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98.

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. Health and Safety Code Section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the County coroner has examined the remains (California Health and Safety Code Section 7050.5[b]). PRC Section 5097.98 also outlines the process to be followed in the event that remains are discovered. If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact the California Native American Heritage Commission (NAHC) within 24 hours (California Health and Safety Code Section 7050.5[c]). In accordance with California Public Resources Code Section 5097.98(a), the NAHC will notify the Most Likely Descendant (MLD). With the permission of the landowner, the MLD may inspect the site of discovery. Within 48 hours of being granted access to the site, the MLD may recommend means of treatment or disposition, with appropriate dignity, of the human remains and associated grave goods.

1.2.6 Assembly Bill 52

California Assembly Bill 52, which took effect July 1, 2015, establishes a consultation process between California Native American tribes and lead agencies in order to address tribal concerns regarding project impacts and mitigation to "tribal cultural resources" (TCR). Public Resources Code section 21074(a) defines TCRs and states that a project that has the potential to cause a substantial adverse change to a TCR is a project that may have an adverse effect on the environment. A TCR is defined as a site, feature, place, cultural landscape, sacred place, and object with cultural value to a California Native American tribe that is either:

1. listed or eligible for listing in the CRHR or a local register of historical resources, or
2. determined by a lead agency to be a TCR.

1.2.7 Guidelines for Determining Significance

According to CEQA (Section 15064.5b), a project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. CEQA defines a substantial adverse change:

> Substantial adverse change in the significance of an historical resource means 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.

The significance of an historical resource is materially impaired when a project:

- 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 CRHR; or
- 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
- Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its eligibility for inclusion in the CRHR as determined by a lead agency for purposes of CEQA.

Section 15064.5(c) of CEQA applies to effects on archaeological sites and contains the following additional provisions regarding archaeological sites:

- When a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource, as defined in subsection (a).
- If a lead agency determines that the archaeological site is a historical resource, it shall refer to the provisions of Section 21084.1 of the Public Resources Code, and this section, Section 15126.4 of the Guidelines, and the limits contained in Section 21083.2 of the Public Resources Code do not apply.
- If an archaeological site does not meet the criteria defined in subsection (a), but does meet the definition of a unique archaeological resource in Section 21083.2 of the Public Resources Code, the site shall be treated in accordance with the provisions of Section 21083.2. The time and cost limitations described in Public Resources Code Section 21083.2 (c–f) do not apply to surveys and site evaluation activities intended to determine whether the project location contains unique archaeological resources.
- If an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment. It shall be sufficient that both the resource and the effect on it are noted in the Initial Study or Environmental Impact Report (EIR), if one is prepared to address impacts on other resources, but they need not be considered further in the CEQA process.

Section 15064.5 (d) and (e) contain additional provisions regarding human remains. Regarding Native American human remains, paragraph (d) provides:

> When an initial study identifies the existence of, or the probable likelihood of, Native American human remains within the project, a lead agency shall work with the appropriate Native Americans as identified by the Native American Heritage Commission as provided in Public Resources Code SS5097.98. The applicant may develop an agreement for treating or disposing of, with appropriate dignity, the human remains and any items associated with Native American burials with the appropriate Native Americans as identified by the Native American Heritage Commission. Action implementing such an agreement is exempt from:
>
> The general prohibition on disinterring, disturbing, or removing human remains from any location other than a dedicated cemetery (Health and Safety Code Section 7050.5); and
>
> 3. The requirement of CEQA and the Coastal Act.

Under CEQA, an EIR is required to evaluate any impacts on unique archaeological resources (PRC Section 21083.2). A "unique archaeological resource" is defined as (PRC Section 21083.2(g)):

> [A]n 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:
>
> Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
>
> 4. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
> 5. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

An impact to a non-unique archaeological resource is not considered a significant environmental impact and such non-unique resources need not be further addressed in the EIR (Public Resources Code Section 21083.2(a); CEQA Guidelines Section 15064.5(c)(4)).

As stated above, CEQA contains rules for mitigation of "unique archeological resources." For example (PRC Section 21083.2(b)(1)-(4)), "[i]f 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:"

> "Planning construction to avoid archeological sites."
>
> 6. "Deeding archeological sites into permanent conservation easements."
> 7. "Capping or covering archeological sites with a layer of soil before building on the sites."
> 8. "Planning parks, greenspace, or other open space to incorporate archeological sites."

PRC 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."

The rules for mitigating impacts to archeological resources to qualify as "historic resources" are slightly different. According to CEQA Guidelines Section 15126.4(b), "[p]ublic agencies should, whenever feasible, seek to avoid damaging effects on any historic resource of an archeological nature. The following factors shall be considered and discussed in an EIR for a project involving such an archeological site:

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:

   Planning construction to avoid archeological sites;

   Incorporation of sites within parks, greenspace, or other open space;

   Covering the archeological sites with a layer of chemically stable soil before building tennis courts, parking lots, or similar facilities on the site [; and]

   Deeding the site into a permanent conservation easement.

Thus, although Section 21083.2 of the Public Resources Code, in addressing "unique archeological sites," provides for specific mitigation options "in no order of preference," CEQA Guidelines Section 15126.4(b), in addressing "historical resources of an archeological nature," provides that "[p]reservation in place is the preferred manner of mitigating impacts to archeological sites."

Under CEQA, "[w]hen data recovery through excavation is the only feasible mitigation," the lead agency shall prepare and adopt a "data recovery plan," prior to any excavation being undertaken. The data recovery plan must make "provision for adequately recovering the scientifically consequential information from and about the historic resource" (CEQA Guidelines Section 15126.4(b)(3)(C)). The data recovery plan also "must be deposited with the California Historical Resources Regional Information Center" (CEQA Guidelines Section 15126.4(b)(3)(C)). Further, "[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)).

1.2.8 City of Oceanside Historic Preservation Ordinance

Chapter 14A of the City of Oceanside Municipal Code, referred to as the Historic Preservation Ordinance, identifies evaluation criteria under which a historical site or area may be designated (Section 14A.6, Ordinance No. 82-14, Section 1, 9-8-82):

a) It exemplifies or reflects special elements of the city's cultural, social, economic, political, aesthetic, engineering, or architectural history; or
b) It is identified with persons or events significant in local, state, or national history; or
c) It embodies distinctive characteristics of a style, type, period, or method of construction, or is a valuable example of the use of indigenous materials or craftsmanship; or
d) It is representative of the notable work of a builder, designer, or architect; or
e) It is found by the council to have significant characteristics which should come under the protection of this chapter.

1.3 Native American Correspondence

Dudek requested a search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) for the Parcel Area and a 1.0-mile buffer on February 12, 2024 (Appendix C). The SLF consists of a database of known Native American resources. These resources may not be included in the SCIC database. The NAHC responded on February 13, 2024 with positive results, but did not provide details on what the resource(s) are or where they are located (Appendix C). The NAHC response letter advised Dudek to contact Native American representatives who may have information about cultural resources within the Parcel Area. Dudek mailed outreach letters on February 14, 2024, to all Native American group representatives included on the NAHC contact list. These letters attempted to solicit additional information relating to resources that may be impacted by the project. The Rincon Band of Luiseño Indians responded on March 6, 2024 stating they would like to consult with the lead agency to review any potential impacts of the project. No other responses from the tribes have been received to date. Any additional responses received will be included in the final draft of this report.

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

1.4 Report Format and Key Personnel

Following this introduction, Chapter 2 presents a cultural and environmental context for characterizing cultural resources. Chapter 3 outlines the methods used to conduct this study. Chapter 4 presents the results of the records search, archival research, and field survey. Chapter 5 summarizes the results of the study and provides recommendations for treatment of cultural resources. Three appendices are included that contain additional information. Confidential Appendix A includes SCIC records search documents, Confidential Appendix B contains a cultural resources location map and updated California Department of Parks and Recreation (DPR) forms, and Appendix C includes the Native American correspondence documents.

Angela Pham, MA, RPA served as project manager and Principal Investigator. Makayla Murillo, BA, co-authored the technical report and led the archaeological field survey. Keshia Montifolca, MA, RPA co-authored the report. Micah Hale, PhD, contributed to the cultural context section. Saving Sacred Sites provided a Luiseño Native American monitor during the field survey on February 23, 2024. John Chavez represented Saving Sacred Sites during the pedestrian survey.

2 Project Background

2.1 Natural Setting

The topography is relatively flat in the western and northern portions of the Parcel Area, and hilly in the center, southern, and eastern portions of the Parcel Area. Seven vegetation communities and land cover types were identified within the Parcel Area: Diegan coastal sage scrub, southern mixed chapparal, urban/developed land, freshwater marsh, southern willow scrub, eucalyptus woodland, and non-native grassland (Koziel 2022). Additionally, the Loma Alta Creek crosses the northwest portion of Parcel Area that is not proposed for development by the project.

2.2 Cultural Setting

Evidence for continuous human occupation in the San Diego County region spans the last 10,000 years. Various attempts to parse out variability in archaeological assemblages over this broad time frame 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 BC), Archaic (8000 BC–AD 500), Late Prehistoric (AD 500–1769), and Ethnohistoric (post-AD 1769).

2.2.1 Paleoindian (pre-5500 BC)

Evidence in coastal Southern California for Paleoindian occupation is tenuous, especially considering 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 SDI-4669/W-12, in La Jolla. A human burial from SDI-4669 was radiocarbon dated to 9,590–9,920 years before present (95.4% probability) (Hector 2007). 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 Emma Lou 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 (MNO-679)—a multicomponent fluted point site—and MNO-680—a single component Great Basined Stemmed point site (Basgall et al. 2002). At MNO-679 and MNO-680, groundstone tools were rare and finely made projectile points were common.

Some of the earliest dated assemblages in coastal Southern California are dominated by processing tools, which 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-7500 BP) that submerged as much as 1.8 kilometers 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 SDI-210 along Agua Hedionda Lagoon, contained stemmed points similar in form to Silver Lake and Lake Mojave projectile points (pre-8000 BP) that are commonly found at sites in California's high desert (Basgall and Hall 1990). SDI-210 yielded one corrected radiocarbon date of 8520–9520 BP (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 (SDI-149) is representative of typical Paleoindian occupation in the San Diego region that possibly dates to between 10,365 and 8200 BC (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).

2.2.2 Archaic (8000 BC–AD 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 AD 500, and 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.

2.2.3 Late Prehistoric (AD 500–1769)

The period following the Archaic and prior to Ethnohistoric times (AD 1769) 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-AD 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 AD 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 because the fundamental Late Prehistoric assemblage is 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 AD 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 AD 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 AD 1450. For southern San Diego County, the picture is less clear. The Cuyamaca Complex is the southern counterpart to the San Luis Rey pattern and is most recognizable after AD 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.

2.2.4 Ethnohistoric (post-AD 1769)

The history of the Native American 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, although these groups did not become the focus of formal, in-depth ethnographic study until the early

20th century (Bean and Shipek 1978; Boscana 1846; Fages 1937; Geiger and Meighan 1976; Harrington 1934; Laylander 2000; Sparkman 1908; White 1963). 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 2005:32) by recording languages and oral histories within the San Diego region. Ethnographic research by Dubois, Kroeber, Harrington, Spier, and others during the early 20th 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 that 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).

Even though there were many informants for these early ethnographies who were able to provide information from personal experiences about native life before the Europeans, a significantly large proportion of these informants were born after 1850 (Heizer and Nissen 1973); therefore, the documentation of precontact, aboriginal culture was being increasingly supplied by individuals born in California after considerable contact with Europeans. As Robert F. Heizer (1978) stated, this is an important issue to note when examining these ethnographies, since considerable culture change had undoubtedly occurred by 1850 among the Native American survivors of California.

The traditional cultural boundaries between the Luiseño and Kumeyaay Native American tribal groups have been well defined by anthropologist Florence C. Shipek (1993 summarized by the San Diego County Board of Supervisors, County of San Diego 2007:6):

> 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 on the divide separating Valley Center from Escondido and then up along Bear Ridge to the 2240 contour line and then north across the divide between Valley Center and Woods Valley up to the 1880-foot peak, then curving around east along the divide above Woods Valley.

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 2006:34). The distribution of recorded Native American languages has been dispersed as a geographic mosaic across California through six primary language families (Golla 2007:71). The Native American inhabitants of the region of the proposed project (Oceanside) would have generally spoken a Luiseño variety of Takic, although they would have had likely come into regular contact with the Ipai-speaking northern Kumeyaay.

Victor Golla has contended that the amount of variability within specific language groups can be interpreted as being associated with the relative "time depth" of the speaking populations (Golla 2007:80). A large amount of variation within the language of a group represents a greater time depth than language with less internal diversity. One method that Golla has employed is 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 (Golla 2007:71). 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 suggests 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 2007:74). 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 circa 2600 BC–AD 1, which was later followed by the diversification within the Takic-speaking San Diego region tribes, occurring approximately 1500 BC–AD 1000 (Laylander 2010). The Luiseño are linguistically and culturally related to the Gabrielino, Cupeño, and Cahuilla, and represent the descendants of local Late Prehistoric populations. They are generally considered to have migrated into the area from the Mojave Desert, possibly displacing the prehistoric ancestors of the Yuman-speaking Kumeyaay (Ipai-Tipai) who lived directly to the south during Ethnohistoric times. Luiseño territory encompassed an area roughly from what is now Agua Hedionda Creek on the coast, east to Lake Henshaw, north to Lake Elsinore, and west through San Juan Capistrano to the coast (Bean and Shipek 1978; Kroeber 1925). The Luiseño shared boundaries with the Gabrielino and Serrano to the west and northwest, the Cahuilla from the deserts to the east, the Cupeño to the southeast, and the Kumeyaay to the south. Southern Native American tribal groups of the 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 2007:74). 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 has contended that previous research indicates a divergence between Ipai and Tipai to have occurred approximately AD 600–1200 (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 Uto–Aztecan inhabitants of the northern San Diego County region were called Luiseños by Franciscan friars, who named the San Luis Rey River and established the San Luis Rey Mission in the heart of Luiseño territory. Luiseño population estimates at the time of Spanish contact range from 3,000 to 4,000 (Kroeber 1925) to upward of 10,000 (White 1963). In either case, the arrival of the Spanish undoubtedly decimated native peoples through disease and changed living conditions (Bean and Shipek 1978).

The Luiseño were organized into patrilineal clans or bands of 25 to 30 people centered on a chief (Kroeber 1925). Each band had its own territorial land or range where food and other resources were collected at different locations throughout the year (Sparkman 1908). The title of chief was heritable along family lines. Inter-band conflict was most common over trespassing. Sparkman observed that “when questioned as to when or how the land was divided and sub-divided, the Indians say they cannot tell, that their fathers told them that it had always been thus” (Sparkman 1908). Place names were assigned to each territory, often reflecting common animals, plants, physical landmarks, or cosmological elements that were understood as being related to that location. Marriages were generally arranged by parents or guardians. Free and widowed women had the option to choose their partner. Polygamy occurred, although was not common, often with a single man marrying a number of sisters. Shamanism was a major component in tribal life. The physical body and its components were thought to be related to the power of an individual, and wastes such as fluids, hair, and nails were discarded with intent. Hair, once cut, was often carefully collected, and buried to avoid being affected negatively or controlled by someone who wishes them harm. Some locations and natural resources were of cultural significance. Springs and other water-related features were thought to be related with spirits. These resources, often a component of origin stories, had power that came with a variety of risks and properties to those who became affected. Puberty ceremonies for both boys and girls were

complex and rigorous. Mourning ceremonies were similar throughout the region, generally involving cutting of the hair, burning of the deceased's clothes a year after death, and redistribution of personal items to individuals outside of the immediate tribal group (Kroeber 1925; Sparkman 1908).

The staple food of the Luiseños during the ethnohistoric period was acorns (Sparkman 1908). Of the at least six oak species within this tribal group's traditional territory, the most desirable of these was black oak (*Quercus kelloggii*) due to its ease of processing, protein content, and digestibility. Acorns were stored in granaries to be removed and used as needed. The acorns were generally processed into flour using a mortar and pestle. The meal was commonly leached with hot water and the use of a rush basket, but there are also accounts of placing meal into excavated sand-and-gravel pits to allow the water to drain naturally. The acorn was then prepared in a variety of ways, although often with the use of an earthen vessel (Sparkman 1908). Other edible and medicinal plants of common use included wild plums, choke cherries, Christmas berry, gooseberry, elderberry, willow, *Juncus*, buckwheat, lemonade berry, sugar bush, sage scrub, currents, wild grapes, prickly pear, watercress, wild oats, and other plants. More arid plants such as *Yucca, Agave*, mesquite, chia, bird-claw fern, *Datura*, yerba santa, *Ephedra*, and cholla were also of common use by some Luiseño populations. A number of mammals were commonly eaten. Game animals included back-tailed deer, antelope, rabbits, hares, birds, ground squirrels, woodrats, bears, mountain lions, bobcats, coyotes, and others. In lesser numbers, reptiles and amphibians may have been consumed. Fish and marine resources provided food for some portion of many tribal communities, although most notably those nearest the coast. Shellfish would have been procured and transported inland from three primary environments: sandy open coast, bay and lagoon, and rocky open coast. The availability of these marine resources changed with rising sea levels, the siltation of lagoon and bay environments, changing climatic conditions, and intensity of use by humans and animals (Sparkman 1908).

2.2.5 Historic Period

Mission San Luis Rey was founded in 1798 in the northeastern area of what would become Oceanside. After Mexico's successful war for independence in 1821, Mexico passed the Secularization Act of 1833 to combat the potential Spanish influence of the missions, which remained loyal to the Roman Catholic Church in Spain after the war. The Mexican government confiscated mission properties between 1834 and 1836; they broke up the properties and either sold them or gave them away to private citizens. This ushered in the Rancho Era, where large tracts of secularized land were held by private individuals and families until the Mexican-American War began in 1846. Part of the Mission property, approximately 2,260 acres to the west of Mission San Luis Rey, was granted in 1845 by Governor Pio Pico to Andrés and José Manuel, local Luiseño Indians, and became Rancho Guajome (Hoffman 1862). Another rancho, Rancho Santa Margarita, was located just north of present-day Oceanside, and Rancho Agua Hedionda was located to the south (Alexander 1912).

During the 1870s, early pioneers moved into the region and founded the Township of San Luis Rey. In 1882, railroad construction began between Riverside and San Diego. One year later, Andrew Jackson Myers applied for a Homestead Grant in what would become downtown Oceanside. On July 3, 1888, the City of Oceanside was incorporated, and the first train depot was built. Oceanside continued to grow, with expansion during the 1920s spurred on by construction of a highway through the town that connected Los Angeles and San Diego. In 1942, the Navy took control of Rancho Santa Margarita and renamed it Camp Joseph H. Pendleton. Construction of Camp Pendleton led to a population boom in Oceanside as military members and their families moved into the area; by 1950, the population had nearly tripled. The continued presence of Camp Pendleton and the growth of population in Southern California led to Oceanside becoming the third largest city in San Diego County (City of Oceanside n.d.; Oceanside Historical Society 2018).

3 Methods

This section describes the techniques employed to identify and evaluate cultural resources within the Parcel Area. All methods meet the Secretary of Interior's guidelines, as do all project personnel for their respective roles.

3.1 Inventory

The inventory portion of this cultural resource investigation consisted of a records search of the Parcel Area and a 1-mile radius around the Parcel Area at the SCIC, located at San Diego State University (SDSU); initiation of correspondence with the NAHC; and an intensive pedestrian survey of the Parcel Area. In addition to the SCIC records, the record search also examined the NRHP, Office of Historic Preservation Archaeological Determinations of Eligibility and Historic Property Directory lists, and historic maps. Historic aerial photographs and topographic maps were also reviewed online (NETR 2024). All previously recorded cultural resources and previous cultural resources investigations were plotted on records search maps and reviewed to assess the potential for discovery of cultural resources within the Parcel Area. Records search results are included in Confidential Appendix A.

Prior to the pedestrian survey, Dudek archaeologist Makayla Murillo and Luiseño Native American monitor John Chavez completed the North County Transit District's (NCTD) Roadway Worker Protection RWP on February 15, 2024. The training was required to secure the right-of-way entry permit to perform the pedestrian survey.

The intensive pedestrian survey for this project was performed by Dudek Archaeologist Makayla Murillo on February 23, 2024. Ms. Murillo was accompanied by Native American monitor John Chavez from Saving Sacred Sites. The survey was conducted using standard archaeological procedures and techniques that meet the Secretary of Interior's standards and guidelines. Survey transects were spaced 15-meters (m) wide and oriented east-west across accessible areas of the Parcel Area. Formal transects were utilized for 75% of the Parcel Area. Where transects were not feasible (such as heavy vegetation coverage), formal transects were not utilized. Instead, a mixed approach (opportunistic survey) was utilized, selectively examining terraces, cut banks, triangles, and ridges where possible, and utilizing existing access trails. Due to heavy vegetation coverage, 25% of the Parcel Area utilized a mixed approach.

Within each transect, the ground surface was examined for prehistoric artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools, ceramics, fire-affected rock), soil discoloration that might indicate the presence of a cultural midden, soil depressions, features indicative of the current or former presence of structures or buildings (e.g., standing exterior walls, post holes, foundations), and historic artifacts (e.g., metal, glass, ceramics, building materials). Ground disturbances such as burrows, cut banks, and drainages were also visually inspected for exposed subsurface materials. All fieldwork was documented using field notes, digital photography, a GPS receiver with sub-meter accuracy, iPad technology with close-scale field maps, and aerial photographs. Location-specific photographs were taken using an Apple 11th Generation iPad equipped with 8 MP resolution and ArcGIS Field Maps. Accuracy of this device ranged between 3 m and 10 m.

For the purposes of site definition, a minimum density of three or more artifacts in a 25 square-meter area was used to constitute an archaeological site, as was the presence of any feature (e.g., concrete foundation). Any separation of 50 m or more between artifacts was considered justification for delineation of a site boundary. Isolated finds consisting of fewer than three artifacts within a 25 square-meter area were recorded separately from sites, including the use of a different numbering scheme. Two previously recorded cultural resources, CA-SDI-10445

and CA-SDI-10446, were revisited during the pedestrian survey within the Parcel Area and the sites were updated on Department of Parks and Recreation (DPR) forms. The DPR site continuation forms for the previously identified resources are included in Confidential Appendix B. CA-SDI-10446 is located within the ADI and would be directly impacted by project implementation whereas CA-SDI-10445 is located within the designated open space area of the project and would be avoided by the project.

4 Results

This section presents the results of the archival searches and pedestrian surveys.

4.1 South Coastal Information Center Records Search

Dudek has records search data from the South Coastal Information Center (SCIC) at San Diego State University (SDSU) for the entire City of Oceanside jurisdiction from 2023 which also covers the entire Parcel Area. An in-house records search for the Parcel Area with a 1.0-mile radius surrounding the Parcel Area was conducted by Dudek on February 9, 2024. These searches included review of mapped prehistoric, historical, and built-environment resources; DPR site records; technical reports; archival resources; and ethnographic references. Additional consulted sources included historical maps of the Parcel Area, the NRHP, the CRHR, the California Historic Property Data File, and the lists of California State Historical Landmarks, California Points of Historical Interest, and the Archaeological Determinations of Eligibility. Additional information, such as previous cultural resources reports intersecting the Parcel Area, were requested and obtained from the SCIC.

Previous Cultural Resources Studies

The records search results indicate 53 previous cultural resource studies have been performed within the 1.0-mile radius surrounding the Parcel Area. Of the 53 previous studies, nine intersect the Parcel Area (Table 1). The entirety of the Parcel Area (100%) has been previously studied, which has resulted in two previously recorded cultural resources, CA-SDI-10445 and CA-SDI-10446, within the Parcel Area, which are discussed in the next section. Table 1 summarizes the nine studies that intersect the Parcel Area within the scope of the 1-0-mile records search followed by a brief summary of the study that has information relevant to the current project. The remaining previous studies located within the 1.0-mile radius are included in Confidential Appendix A.

Table 1 Cultural Studies within the Parcel Area

Report I.D.	Title	Author	Year
SD-00577	MAP FOR HIGHWAY ALTERNATIVES STUDY 11-SD-76 0.012.9 11821-159021	CALTRANS	1982
SD-00595	ARCHAEOLOGICAL TESTING AND SITE SIGNIFICANCE ASSESSMENT AT SDI-5508, W-1778, W-2248 RANCHO DEL ORO DEVELOPMENT OCEANSIDE, CALIFORNIA.	WESTEC Services, Inc.	1986
SD-01320	ARCHAEOLOGICAL SURVEY OF THE RANCHO DEL ORO PROPERTY, OCEANSIDE, CALIFORNIA	WESTEC Services, Inc.	1979
SD-01677	A CULTURAL RESOURCE SURVEY OF THE LOMA ALTA CREEK IMPROVEMENT PLAN AREA	RECON	1989
SD-01734	CULTURAL RESOURCE SURVEY AND ARCHAEOLOGICAL TEST AT SITES SDI-10445 AND SDI-10446, AMERICANA WESTWIND PROJECT, OCEANSIDE, CALIFORNIA	WESTEC Services, Inc.	1986
SD-06112	ARCHAEOLOGICAL RECONAISSANCE OF APPROXIMATELY 185+/- ACRES IN OCEANSIDE, CA APPENDIX "D" AND "E"	CHRISTOPHER DROVER	1978

Table 1 Cultural Studies within the Parcel Area

Report I.D.	Title	Author	Year
SD-08733	MISSION WELLS DRAFT APPENDICES-CULTURAL RESOURCES SURVEY AND ASSESSMENT OF THE MISSION WELLS PROJECT OCEANSIDE, CALIFORNIA	WESTEC SERVICES, INC	1986
SD-12039	CULTURAL RESOURCES MONITORING REPORT FOR THE NORTH COUNTY TRANSIT DISTRICT (NCTD) SPRINTER RAIL PROJECT OCEANSIDE TO ESCONDIDO, CALIFORNIA	GALLEGOS & ASSOCIATES	2007
SD-14069	CULTURAL AND HISTORICAL RESOURCE STUDY FOR THE CITY OF OCEANSIDE GENERAL PLAN-CIRCULATION ELEMENT UPDATE PROGRAM ENVIRONMENTAL IMPACT REPORT (PEIR)	ASM AFFILIATES, INC.	2011

SD-01734

Westec Services, Inc. prepared a report that covers the entire Parcel Area a titled *Cultural Resource Survey and Archaeological Test at Sites CA-SDI-10445 and CA-SDI-10446 for the American Westwind Project, Oceanside, California* in 1986 (Gallegos and Pigniolo 1986). The study consisted of a field survey and subsurface testing for CA-SDI-10445 and CA-SDI-10446. CA-SDI-10445 is a small prehistoric habitation site and a total of 13 potholes and three 1 x 1 m units were excavated and the results were negative. CA-SDI-10446 is a prehistoric temporary campsite and a total of 16 potholes and a single 1 x 1 m unit were excavated and the results were negative. Both resources were evaluated for significance under CEQA and do not qualify as significant archaeological resources under CEQA. This study concluded that these sites could be considered mitigated through the pedestrian survey, site identification/recordation, surface collection, site mapping and subsurface testing and no additional mitigation was recommended (Gallegos and Pigniolo 1986).

Previously Recorded Cultural Resources

The SCIC records search also identified 17 previously recorded cultural resources within 1.0-mile of the Parcel Area (Table 2). Of the 17 cultural resources, two are located within the Parcel Area, CA-SDI-10445 (habitation site) and CA-SDI-10446 (temporary campsite). The remaining resources located within 1.0-mile of the Parcel Area consists of six historic era buildings, eight prehistoric resources consisting of two artifact scatters, two lithic scatters, two lithic and shell scatters, two shell scatters, and one prehistoric isolate consisting of two pieces of debitage. A total of one historic address is located within 1.0-mile of the Parcel Area and is not located within the Parcel Area. The results of the records search and all the DPR Forms for the project are included in Confidential Appendix A.

Table 2. Cultural Resources within the 1.0-Mile of the Parcel Area

P-Number	Trinomial	Era	Resource Type	Eligibility
Resources Within the Parcel Area				
P-37-010445	CA-SDI-10445	Prehistoric	Habitation Site	Not significant
P-37-010446	CA-SDI-10446	Prehistoric	Temporary Campsite	Not significant
Resources Outside the Parecel Area				
P-37-004979	CA-SDI-04979	Prehistoric	Lithic scatter, shell scatter	Not evaluated

Table 2. Cultural Resources within the 1.0-Mile of the Parcel Area

P-Number	Trinomial	Era	Resource Type	Eligibility
P-37-004981	CA-SDI-04981	Prehistoric	Artifact scatter	Not evaluated
P-37-004982	CA-SDI-04982	Prehistoric	Artifact scatter	Not evaluated
P-37-004993	CA-SDI-04993	Prehistoric	Shell scatter	Not evaluated
P-37-008090	CA-SDI-08090	Prehistoric	Lithic scatter	Not evaluated
P-37-009898	CA-SDI-09898	Prehistoric	Lithic scatter	Not evaluated
P-37-025144	—	Historic	Building	Not eligible for listing on the NRHR
P-37-025145	—	Historic	Building	Not eligible for listing on the NRHR
P-37-025146	—	Historic	Building	Not eligible for listing on the NRHR
P-37-025147	—	Historic	Building	Not eligible for listing on the NRHR
P-37-027373	CA-SDI-17894	Prehistoric	Lithic scatter and shell scatter	Not evaluated
P-37-027374	CA-SDI-17895	Prehistoric	Shell scatter	Not evaluated
P-37-036288	—	Historic	Building and historic refuse	Not eligible for listing on the NRHR
P-37-038561	—	Historic	Buildings	Not eligible for listing on the NRHR
P-37-036287	—	Prehistoric	Isolate: Lithic	Not evaluated

CA-SDI-10445/P-37-010445/W-3659

CA-SDI-10445 is a small prehistoric habitation site originally recorded by Westec Services Inc. in 1986 (Gallegos and Pigniolo 1986). The habitation site consists of an artifact scatter covering a 50 x 50 m area. Westec revisited the site in 1986 to conduct a survey and subsurface testing to determine if intact subsurface deposits were present. The testing program consisted of a surface collection and a total of 38 artifacts were collected consisting of flaked stone tools, percussion tools, handstone fragments, debitage, angular waste, groundstone fragments, and a ceramic sherd. The testing program consisted of 13 potholes and three 1 x 1 m units and yielded negative results. CA-SDI-10445 was evaluated for significance under CEQA and does not qualify as a significant archaeological resource under CEQA (Gallegos and Pigniolo 1986). The site was revisited by James & Briggs Archaeological Services in 2004 and the site was found to be in the same condition as when it was originally recorded in 1986 and was updated to include an additional 10 artifacts on the surface (James and Pigniolo 2004).

CA-SDI-10446/P-37-010446/W-3660

CA-SDI-10446 is a prehistoric temporary campsite originally recorded by Westec Services Inc. in 1986 (Gallegos and Pigniolo 1986). The temporary campsite consists of a light artifact scatter covering a 60 x 50 m area. Westec revisited the site in 1986 to conduct a survey and subsurface testing to determine if intact subsurface deposits were present. The testing program consisted of a surface collection and a total of 16 artifacts were collected consisting of flaked stone tools, percussion tools, handstone fragments, debitage, and angular waste. The testing program consisted of 16 potholes and one 1 x 1 m unit and yielded negative results. CA-SDI-10446 was evaluated for significance under

CEQA and determined to not be a significant archaeological resource under CEQA (Gallegos and Pigniolo 1986). The site was revisited by James & Briggs Archaeological Services in 2004 and the site was found to be in the same condition as it was when originally recorded in 1986 and was updated to include an additional four artifacts on the surface (James and Pigniolo 2004).

4.2 Archival Research

In addition to the SCIC records search, Dudek conducted an online review of historic aerial photographs of the Parcel Area and general vicinity, to help determine the possible development and land use of the Parcel Area in the past. Historic aerial photographs of the project were available between 1938 and 2020 (NETR 2024). The 1938 aerial imagery reveals the entirety of the Parcel Area as largely undeveloped, however, a small orchard is located within the northwestern section of the Parcel Area and outside of the ADI. Additionally, the aerial photograph from 1938 shows the Parcel Area is bounded by Southern California Railroad (NCTD Sprinter rail line) to the north, a dirt pedestrian trail trending east/west to the south, and the Loma Alta Creek to the northwest. The 1946 aerial photograph reveals that the orchard is no longer visible. The aerial imagery from 1953 shows the Parcel Area with less vegetation present. There are no substantial changes revealed in the aerial imagery from 1964. Between 1967 and 1978 the aerial imagery reveals a steady increase of pedestrian trails throughout the entire Parcel Area. The 1978 aerial photograph shows residential development located south and east of the Parcel Area and grading activity to the north of the Parcel Area. The 1980 aerial photography reveals commercial development northwest of the Parcel Area a. Between 1981 and 1988, there are no substantial changes within the Parcel Area, however, there is a steady increase of commercial and residential development within the general vicinity of the Parcel Area. The aerial imagery from 1989 shows a steady increase of pedestrian trails within the Parcel Area. Between 1989 and 1997, there are no substantial changes within the Parcel Area. The aerial imagery from 1997 reveals the Parcel Area contains less vegetation. By 1998, the aerial photograph shows a few drainages trending north to south on the eastern portion of the Parcel Area. Between 1999 and 2005, there are no substantial changes within the Parcel Area. The 2005 aerial imagery reveals the NCTD Sprinter rail line right of way as expanded. The current condition of the Parcel Area and surrounding areas are the same as seen in the 2010 aerial photograph. Approximately 10% of the Parcel Area has been previously disturbed. A review of the aerial photographs reveals that no historic age structures are located within the Parcel Area.

Historic topographic maps of the Parcel Area were reviewed (earliest map available is 1893). The historic topographic map from 1893 reveal the presence of the NCTD Sprinter rail line immediately north of the Parcel Area. Also observed on the 1893 topographic map is Loma Alta Creek, located along the northwestern portion of the Parcel Area. A review of the topographic maps reveals that there are no historic age structures located within the Parcel Area.

4.3 Review of Geomorphological Context

According to the U.S. Department of Agriculture Natural Resources Conservation Services (USDA 2024), five soil types are mapped in the Parcel Area, including Corralitos loamy sand, Diablo clay, Gaviota fine sandy loam, Las Flores loamy fine sand, and Salinas clay loam, The Corralitos loamy sand soil series generally occur in settings with alluvial fans at elevations ranging from 30 to 1,000 feet and are comprised of alluvium derived from calcareous sandstone. The Diablo clay soil series generally occur on mountain slopes or hillslopes at elevations ranging from 20 to 2,530 feet and are comprised of residuum weathered from calcareous shale. The Gaviota fine sandy loam soil series generally occur on hillslopes at elevations ranging from 100 to 4,000 feet and are comprised of residuum

weathered from calcareous sandstone. The Las Flores loamy fine sandy soil series generally occur on hillslopes at an elevation of 700 feet and are comprised of residuum weathered from siliceous calcareous sandstone. The Salinas clay loam soil series generally occur in settings with alluvial fans at elevations ranging from 0 to 900 feet and are comprised of alluvium derived from sedimentary rock (USDA 2024). Reoccurring alluvial action and flooding serve to support the presence of subsurface cultural deposits in the area. Since there are alluvial soils present throughout the project area, there is moderate potential for subsurface cultural resources.

4.4 Survey Results

The topography is relatively flat in the western and northern portions of the Parcel Area, and hilly in the center, southern, and eastern portions of the Parcel Area. Visibility of the ground surface was poor (0-25%) throughout the northern, eastern, and center portions of Parcel Area due to moderate vegetation coverage (Figure 3). In areas obscured by dense vegetation throughout the southern and western portions, the ground visibility was very poor (-05%) (Figure 4). Vegetation within the Parcel Area included creosote bushes, sagebrush, white sage, sumac, dill, sunflower, star thistle, tumbleweed, deer grass and trees, including eucalyptus and pine. In the western and central portions of the Parcel Area, the ground soil consists of brown silt loam with angular gravels. In the eastern portion of the Parcel Area, the ground soil consists of a light brown sand and clay mixture. Disturbances throughout the Parcel Area include modern refuse, vehicle tracks, multiple dirt pedestrian trails, and unsheltered/homeless encampment debris. Several occupied unsheltered/homeless encampments are located throughout the entire southern boundary of the Parcel Area (Figure 5). The southern portion of the Parcel Area has been disturbed with evidence of spoil piles and hand excavated stairways/pathways. The northern portion of the Parcel Area contains a dirt pedestrian trail trending east-west. Additionally, there are several more dirt pedestrian trails located throughout the central and southern portion of the Parcel Area.

Dudek revisited the two previously recorded prehistoric sites, CA-SDI-10445 and CA-SDI-10446. The sites are discussed in detail in the next section below. No additional features or artifacts were identified within the Parcel Area.

4.4.1 Previously Recorded Sites and Evaluation Results

CA-SDI-10445/P-37-010445

CA-SDI-10445 was originally recorded as a small habitation site by Westec Services Inc. in 1986 (Gallegos and Pigniolo 1986). Westec revisited the resource in 1986 to conduct a survey and subsurface testing. The testing program consisted of a surface collection and a total of 38 artifacts were collected consisting of flaked stone tools, percussion tools, handstone fragments, debitage, angular waste, groundstone fragments, and a ceramic sherd. The testing program consisted of 13 potholes and three 1 x 1 m units and yielded negative results. CA-SDI-10445 was evaluated for significance under CEQA and does not qualify as significant archaeological resource under CEQA (Gallegos and Pigniolo 1986). The resource was revisited by James & Briggs Archaeological Services in 2004 and was found to be in the same condition as it was when originally recorded in 1986 and the site was updated to include an additional 10 artifacts on the surface (James and Pigniolo 2004).

Dudek revisited CA-SDI-10445 and identified three artifacts consisting of two handstone fragments (5.5 x 8 x 4.5 cm and 8 x 9 x 5 cm) and one retouched flaked stone tool (8 x 8.5 x 2.5 cm). All artifacts were identified on the

surface located in the southwestern portion of the resource boundary. No evidence of midden or subsurface soils were observed. CA-SDI-10445 appears to be in a similar condition as previously recorded by the 2004 survey. The resource is heavily disturbed with unsheltered encampment debris, modern trash pits, and one pet burial. Topography is relatively flat. Vegetation includes sagebrush and grass. The ground soil consists of a moderately compacted medium brown sandy loam with angular gravels. Dudek concurs with the previous evaluation that CA-SDI-10445 does not qualify as a significant archaeological resource under CEQA (Gallegos and Pigniolo 1986).

CA-SDI-10446/P-37-010446

CA-SDI-10446 was originally recorded by Westec Services Inc. in 1986 as a prehistoric temporary campsite (Gallegos and Pigniolo 1986). Westec revisited the resource in 1986 to conduct a survey and subsurface testing. The testing program consisted of a surface collection and a total of 16 artifacts were collected consisting of flaked stone tools, percussion tools, handstone fragments, debitage, and angular waste. The testing program consisted of 16 potholes and one 1 x 1 m unit and yielded negative results. CA-SDI-10446 was evaluated for significance under CEQA and does not qualify as a significant archaeological resource under CEQA (Gallegos and Pigniolo 1986). The resource was revisited by James & Briggs Archaeological Services in 2004 and was found to be in the same condition as it was when originally recorded in 1986 and was updated to include an additional four artifacts on the surface (James and Pigniolo 2004).

Dudek revisited CA-SDI-10446 and identified one artifact consisting of one brownware ceramic body fragment measuring 5.5 x 5.5 x 1 cm. The artifact was identified on the surface located in the southwestern portion of the resource boundary. No evidence of midden or subsurface soils were observed. CA-SDI-10446 appears to be in a similar condition as previously recorded by the 2004 survey. The resource is heavily disturbed with unsheltered encampment debris, modern trash pits, heavy equipment tracks, vehicle tire tracks, and natural drainages. Topography is relatively flat. Vegetation includes sagebrush, star thistle, grass, and one pine tree. The ground soil consists of a moderately compacted light brown sandy loam with angular gravels. Dudek concurs with the previous evaluation that CA-SDI-10446 does not qualify as a significant archaeological resource under CEQA (Gallegos and Pigniolo 1986).

Figure 3. Overview of the Parcel Area facing west

Figure 4. Overview of the Parcel Area facing south

Figure 5. Overview disturbances facing southwest

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5 Summary and Management Considerations

5.1 Resource Management

Dudek's cultural resources inventory of the project indicates that there is high sensitivity for identifying intact subsurface cultural deposits during project implementation. The SCIC records search indicate that two previously recorded cultural resources, CA-SDI-10445 and CA-SDI-10446, are located within the Parcel Area. CA-SDI-10446 is located within the ADI and would be directly impacted by project implementation whereas CA-SDI-10445 would be avoided by the project and left in open space. Both resources have been previously evaluated for significance under CEQA and determined to not be significant archaeological resources under CEQA (Gallegos and Pigniolo 1986). During the pedestrian survey, the previously recorded resources were revisited and cultural material were identified in the boundaries of the resources. The sites are in the same condition as previously determined and Dudek concurs with the previous determination. No additional features or artifacts were identified within the Parcel Area.

Due to the known presence of cultural resources, CA-SDI-10445 and CA-SDI-10446, within the Parcel Area, the presence of Loma Alta Creek within the northwestern section of the Parcel Area, presence of alluvial soils which are suited to contain subsurface archaeological deposits, and the number of known cultural resources within close proximity of the Parcel Area, Dudek recommends that an archaeological monitor and a Luiseño Native American monitor are present full-time during initial ground disturbance of the Parcel Area. Should cultural resources or subsurface cultural deposits be identified, monitoring may need to be increased, as determined by the archaeologist, the monitoring Tribe, and the City. If disturbed sediments (e.g., fill) or other sediments and formations are identified that do not have the potential to contain cultural resources, then monitoring may be reduced or terminated.

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 notified within 24 hours 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 County Coroner has determined, within two working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the remains are determined to be Native American, the Coroner shall notify the NAHC in Sacramento within 24 hours. In accordance with California Public Resources Code, Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descended (MLD) from the deceased Native American. The MLD shall complete their inspection within 48 hours of being granted access to the site. The designated Native American representative would then make a recommendation, in consultation with the property owner, regarding the treatment and disposition of the human remains.

To further ensure project development would not result in potential impacts to cultural resources, the project would implement the City's standard cultural mitigation measures (MM), **CUL-1** through **CUL-9**, outlined below.

MM CUL-1: Prior to the issuance of a Grading Permit, the Applicant/Owner shall enter into a pre-excavation agreement, otherwise known as a Tribal Cultural Resources Treatment and Tribal Monitoring Agreement with the "Traditionally and Culturally Affiliated (TCA) Native American Monitor associated with a TCA Luiseño Tribe". A copy of the agreement shall be included in the Grading Plan Submittals for the Grading Permit. The purpose of this agreement shall be to formalize protocols and procedures between the Applicant/Owner and the "Traditionally and Culturally Affiliated (TCA) Native American Monitor associated with a TCA Luiseño Tribe" for the protection and treatment of, including but not limited to, Native American human remains, funerary objects, cultural and religious landscapes, ceremonial items, traditional gathering areas and tribal cultural resources, located and/or discovered through a monitoring program in conjunction with the construction of the proposed project, including additional archaeological surveys and/or studies, excavations, geotechnical investigations, grading, and all other ground disturbing activities. At the discretion of the Luiseño Native American Monitor, artifacts may be made available for 3D scanning/printing, with scanned/printed materials to be curated at a local repository meeting the federal standards of 36CFR79.

MM CUL-2: Prior to the issuance of a Grading Permit, the Applicant/Owner or Grading Contractor shall provide a written and signed letter to the City of Oceanside Planning Division stating that a Qualified Archaeologist and Luiseño Native American Monitor have been retained at the Applicant/Owner or Grading Contractor's expense to implement the monitoring program, as described in the pre-excavation agreement.

MM CUL-3: The Qualified Archaeologist shall maintain ongoing collaborative consultation with the Luiseño Native American monitor during all ground disturbing activities. The requirement for the monitoring program shall be noted on all applicable construction documents, including demolition plans, grading plans, etc. The Applicant/Owner or Grading Contractor shall notify the City of Oceanside Planning Division of the start and end of all ground disturbing activities.

MM CUL-4: The Qualified Archaeologist and Luiseño Native American Monitor shall attend all applicable pre-construction meetings with the General Contractor and/or associated Subcontractors to present the archaeological monitoring program. The Qualified Archaeologist and Luiseño Native American Monitor shall be present on-site full-time during grubbing, grading and/or other ground altering activities, including the placement of imported fill materials or fill used from other areas of the project site, to identify any evidence of potential archaeological or tribal cultural resources. All fill materials shall be absent of any and all tribal cultural resources.

MM CUL-5: 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 Luiseño Native American monitor, other TCA Luiseño Tribes that have participated in the state-prescribed process for this project, and the Applicant/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 Luiseño 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: The Qualified Archaeologist or the Luiseño Native American monitor may halt ground disturbing activities if unknown tribal cultural resources, archaeological artifact deposits or cultural features are discovered. Ground disturbing activities shall be directed away from these deposits to allow a determination of potential importance. Isolates and clearly non-significant deposits will be minimally documented in the field, and before grading proceeds these items shall be secured until they can be repatriated. If items cannot be securely stored on the project site, they may be stored in off-site facilities located in San Diego County. If the Qualified Archaeologist and Luiseño Native American monitor determine that the unearthed tribal cultural resource, artifact deposits or cultural features are considered potentially significant TCA Luiseño Tribes that have participated in the state-prescribed consultation process for this project shall be notified and consulted regarding the respectful and dignified treatment of those resources. The avoidance and protection of the significant tribal cultural resource and/or unique archaeological resource is the preferable mitigation. If, however, it is determined by the City that avoidance of the resource is infeasible, and it is determined that a data recovery plan is necessary by the City as the Lead Agency under CEQA, TCA Luiseño Tribes that have participated in the state-prescribed consultation process for this project shall be notified and consulted regarding the drafting and finalization of any such recovery plan. For significant tribal cultural resources, artifact deposits or cultural features that are part of a data recovery plan, an adequate artifact sample to address research avenues previously identified for sites in the area will be collected using professional archaeological collection methods. The data recovery plan shall also incorporate and reflect the tribal values of the TCA Luiseño Tribes that have participated in the state-prescribed consultation process for this project. If the Qualified Archaeologist collects such resources, the Luiseño Native American monitor must be present during any testing or cataloging of those resources. Moreover, if the Qualified Archaeologist does not collect the tribal cultural resources that are unearthed during the ground disturbing activities, the Luiseño Native American monitor, may at their discretion, collect said resources and provide them to the appropriate TCA Luiseño Tribe, as determined through the appropriate process, for respectful and dignified treatment in accordance with the Tribe's cultural and spiritual traditions. Ground disturbing activities shall not resume until the Qualified Archaeologist, in consultation with the Luiseño Native American Monitor, deems the cultural resource or feature has been appropriately documented and/or protected.

MM CUL-7: The landowner shall relinquish ownership of all tribal cultural resources unearthed 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 appropriate TCA Luiseño Tribe, as determined through the appropriate process, for respectful and dignified treatment and disposition, including reburial at a protected location on-site, 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. No tribal cultural resources shall be subject to curation.

MM CUL-8: Prior to the release of the grading bond, a monitoring report and/or evaluation report, if appropriate, which describes the results, analysis and conclusions of the archaeological monitoring

program (e.g., data recovery plan) shall be submitted by the Qualified Archaeologist, along with the Luiseño Native American monitor's notes and comments, to the City of Oceanside Planning Division for approval.

MM CUL-9: As specified by California Health and Safety Code Section 7050.5, if human remains are found on the project site during construction or during archaeological work, the person responsible for the excavation, or his or her authorized representative, shall immediately notify the San Diego County Office of the Medical Examiner by telephone. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Medical Examiner has made the necessary findings as to origin and disposition pursuant to Public Resources Code 5097.98. If such a discovery occurs, a temporary construction exclusion zone shall be established surrounding the area of the discovery so that the area would be protected, and consultation and treatment could occur as prescribed by law. If suspected Native American remains are discovered, the remains shall be kept in-situ, or in a secure location in close proximity to where they were found, and the analysis of the remains shall only occur on-site in the presence of a Luiseño Native American monitor. By law, the Medical Examiner will determine within two working days of being notified if the remains are subject to his or her authority. If the Medical Examiner identifies the remains to be of Native American ancestry, he or she shall contact the Native American Heritage Commission (NAHC) within 24 hours. The NAHC shall make a determination as to the Most Likely Descendent.

6 References

Alexander, William E. 1912. Plat Book of San Diego County, California. Los Angeles: Pacific Plat Book Co.

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.J. 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*, edited 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 Oceanside. n.d. "History." Accessed March 19, 2018. http://www.ci.oceanside.ca.us/about/history.asp.

County of San Diego. 2007. Ordinance No. 9890 (N/S). County of San Diego Board of Supervisors. San Diego, California.

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

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 Herbert Ingram Priestly1978 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 and Pigniolo. 1986. *Cultural Resource Survey and Archaeological Test at Sites CA-SDI-10445 and CA-SDI-10446 for the American Westwind Project, Oceanside, California*. Submitted to American Diversified Capital Corporations.

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

Hale, M.J. 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.

Hector, S.M. 2007. Archaeological Investigations at University House Meeting Center and Chancellor Residence, CA-SDI-4669 (SDM-W-12), University of California at San Diego, La Jolla, California. ASM Affiliates.

Heizer, R. 1978. "Introduction." In *California*, edited by R.F. Heizer, 1–6. Handbook of North American Indians, Vol. 8, edited by W.C. Sturtevant. Washington, D.C.: Smithsonian Institution.

Heizer, R., and K.M. Nissen. 1973. *The Human Sources of California Ethnography*. Berkeley, California: University of California Archaeological Research Facility, Berkeley.

Hoffman, Ogden. 1862. Reports of Land Cases Determined in the United States District Court for the Northern District of California, Numa Hubert, San Francisco.

James and Pigniolo. P-37-010445 Site Form. On file at the SCIC, San Diego State University, California.

James and Pigniolo. P-37-010446 Site Form. On file at the SCIC, San Diego State University, California.

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.

Koziel, O. 2022. Vegetation Mapping Update Memorandum for the Trolley Place Project, Oceanside, California.

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.J. 2005. *Indians, Missionaries, and Merchants*. Berkeley, California: University of California Press.

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

NETR 2024. "California Street, Oceanside California" Nationwide Environmental Title Research Online Historic Aerials website. Accessed February 23, 2024. https://www.historicaerials.com/viewer

Oceanside Historical Society. 2018. "Oceanside History Timeline." Accessed March 19, 2018. http://www.oceansidehistoricalsociety.org/oceanside-history-timeline/.

Office of Historic Preservation. 1995. Instructions for Recording Historical Resources. California State Parks, Office of Historic Preservation. March 1995. http://ohp.parks.ca.gov/pages/1054/files/manual95.pdf.

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.

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 Prehistory." *Southwestern Journal of Anthropology* 1:167–198.

Sparkman, Philip S. 1908. "The Culture of the Luiseño Indians." *University of California Publications in Archaeology and Ethnology* 8(4):187–234.

True, D.L. 1966. Archaeological Differentiation of Shoshonean and Yuman Speaking Groups in Southern California. 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.

USDA (U.S. Department of Agriculture). 2024. Web Soil Survey. USDA, Natural Resources Conservation Service, Soil Survey Staff. Accessed February 20, 2024. http://websoilsurvey.nrcs.usda.gov

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. 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., 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.

White, Raymond C. 1963. "Luiseño Social Organizations." *University of California Publications in American Archaeology and Ethnology* 48(2):1–194.

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Appendix A (Confidential)

SCIC Records Search Documents

Appendix B (Confidential)

Cultural Resources Overview and
Updated DPR Site Forms

Appendix C

NAHC Sacred Lands File Search Results and Tribal Correspondence

From: Makayla Murillo
Sent: Monday, February 12, 2024 12:49 PM
To: NAHC@NAHC
Cc: Angela Pham; Keshia Montifolca
Subject: Trolley Place Project (PN# 15953)
Attachments: Trolley Place (PN#15953) SLF Request Form.pdf

Dear NAHC Staff,

I would like to request a Sacred Lands File search for the Trolley Place Project (PN# 15953). The Project
area is located in the City of Oceanside, California. I have attached a record search map and description.
Please let me know if you have any questions.

Thank you,

Makayla Murillo
O: 760 846 5874 C: 760 846 5874
Archaeologist
dudek.com

Sacred Lands File & Native American Contacts List Request

Native American Heritage Commission
1550 Harbor Blvd, Suite 100
West Sacramento, CA 95691
916-373-3710
916-373-5471 – Fax
nahc@nahc.ca.gov

Information Below is Required for a Sacred Lands File Search

Project: Trolley Place Project (PN # 15953)

County: San Diego County

USGS Quadrangle Name: 7.5-Minute Series San Luis Rey Quadrangle

Township: 11S **Range:** 4W **Section(s):** 22

Company/Firm/Agency: Dudek

Street Address: 605 Third Street

City: Encinitas **Zip:** 92024

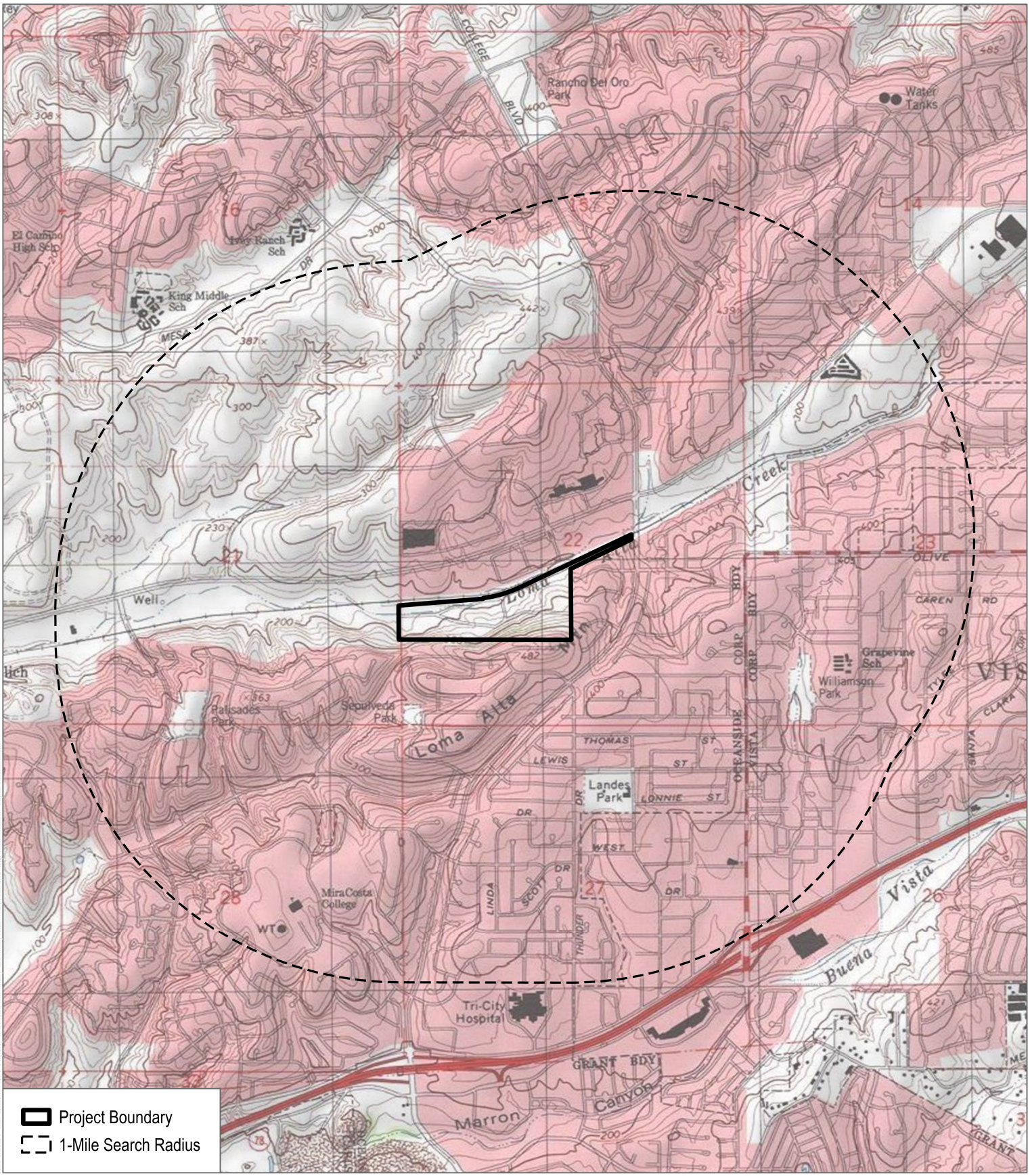
Phone: 760.479.4827

Fax: 760.632.0164

Email: mmurillo@dudek.com & apham@dudek.com

Project Description:

The project proposes residential development of approximately 300 to 400 units located south of Oceanside Boulevard and the Sprinter/rail line and west of Olive Drive in the City of Oceanside, California.



SOURCE: USGS 7.5-Minute Topo Series 1:24,000

San Luis Rey Quadrangle - Township 11S Range 4W Section 22

DUDEK

0 500 1,000 Feet

0 260 520 Meters

Records Search

Trolley Place

NATIVE AMERICAN HERITAGE COMMISSION

CHAIRPERSON
Reginald Pagaling
Chumash

VICE-CHAIRPERSON
Buffy McQuillen
Yokayo Pomo, Yuki, Nomlaki

SECRETARY
Sara Dutschke
Miwok

PARLIAMENTARIAN
Wayne Nelson
Luiseño

COMMISSIONER
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Ohlone-Costanoan

COMMISSIONER
Stanley Rodriguez
Kumeyaay

COMMISSIONER
Laurena Bolden
Serrano

COMMISSIONER
Reid Milanovich
Cahuilla

COMMISSIONER
Vacant

EXECUTIVE SECRETARY
Raymond C. Hitchcock
Miwok, Nisenan

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

February 13, 2024

Makayla Murillo
Dudek

Via Email to: mmurillo@dudek.com

Re: Trolley Place (PN # 15953) Project, San Diego County

To Whom It May Concern:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information submitted for the above referenced project. The results were positive. Please contact the La Jolla Band of Luiseno Indians and San Luis Rey Band of Mission Indians on the attached list for information. Please note that tribes do not always record their sacred sites in the SLF, nor are they required to do so. A SLF search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with a project's geographic area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites, such as the appropriate regional California Historical Research Information System (CHRIS) archaeological Information Center for the presence of recorded archaeological 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. Please contact all of those listed; if they cannot supply information, they may 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 the NAHC. 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: Murphy.Donahue@NAHC.ca.gov

Sincerely,

Murphy Donahue

Murphy Donahue
Cultural Resources Analyst

Attachment

Native American Heritage Commission
Native American Contact List
San Diego County
2/13/2024

Tribe Name	Fed (F) Non-Fed (N)	Contact Person	Contact Address	Phone #	Fax #	Email Address	Cultural Affiliation	Counties	Last Updated
Barona Group of the Capitan Grande	F	Art Bunce, Attorney		(760) 489-0329		buncelaw@aol.com	Diegueno	Imperial,San Diego	7/25/2023
Campo Band of Diegueno Mission Indians	F	Ralph Goff, Chairperson	36190 Church Road, Suite 1 Campo, CA, 91906	(619) 478-9046	(619) 478-5818	rgoff@campo-nsn.gov	Diegueno	Imperial,Orange,Riverside,San Diego	
Ewiiaapaayp Band of Kumeyaay Indians	F	Michael Garcia, Vice Chairperson	4054 Willows Road Alpine, CA, 91901	(619) 933-2200	(619) 445-9126	michaelg@leaningrock.net	Diegueno	Imperial,Orange,Riverside,San Diego	
Ewiiaapaayp Band of Kumeyaay Indians	F	Robert Pinto, Chairperson	4054 Willows Road Alpine, CA, 91901	(619) 368-4382	(619) 445-9126	ceo@ebki-nsn.gov	Diegueno	Imperial,Orange,Riverside,San Diego	
Iipay Nation of Santa Ysabel	F	Clint Linton, Director of Cultural Resources	P.O. Box 507 Santa Ysabel, CA, 92070	(760) 803-5694		clinton@redtailenvironmental.com	Diegueno	Imperial,San Diego	11/30/2023
Inaja-Cosmit Band of Indians	F	Rebecca Osuna, Chairperson	2005 S. Escondido Blvd. Escondido, CA, 92025	(760) 737-7628	(760) 747-8568		Diegueno	Imperial,San Diego	
Jamul Indian Village	F	Erica Pinto, Chairperson	P.O. Box 612 Jamul, CA, 91935	(619) 669-4785	(619) 669-4817	epinto@jiv-nsn.gov	Diegueno	Imperial,San Diego	
Jamul Indian Village	F	Lisa Cumper, Tribal Historic Preservation Officer	P.O. Box 612 Jamul, CA, 91935	(619) 669-4855		lcumper@jiv-nsn.gov	Diegueno	Imperial,San Diego	9/5/2018
Juaneno Band of Mission Indians Acjachemen Nation 84A	N	Heidi Lucero, Chairperson, THPO	31411-A La Matanza Street San Juan Capistrano, CA, 92675	(562) 879-2884		jbmian.chairwoman@gmail.com	Juaneno	Los Angeles,Orange,Riverside,San Bernardino,San Diego	3/28/2023
Kwaaymii Laguna Band of Mission Indians	N	Carmen Lucas, Chairperson	P.O. Box 775 Pine Valley, CA, 91962	(619) 709-4207			Kwaaymii Diegueno	Imperial,San Diego	6/20/2023
La Jolla Band of Luiseno Indians	F	Norma Contreras, Chairperson	22000 Highway 76 Pauma Valley, CA, 92061	(760) 742-3771			Luiseno	Orange,Riverside,San Diego	
La Posta Band of Diegueno Mission Indians	F	Gwendolyn Parada, Chairperson	8 Crestwood Road Boulevard, CA, 91905	(619) 478-2113	(619) 478-2125	LP13boots@aol.com	Diegueno	Imperial,Orange,Riverside,San Diego	

Manzanita Band of Kumeyaay Nation	F	Angela Elliott Santos, Chairperson	P.O. Box 1302 Boulevard, CA, 91905	(619) 766-4930	(619) 766-4957		Diegueno	Imperial,Orange,Riverside,San Diego	
Mesa Grande Band of Diegueno Mission Indians	F	Michael Linton, Chairperson	P.O Box 270 Santa Ysabel, CA, 92070	(760) 782-3818	(760) 782-9092	mesagrandeband@msn.com	Diegueno	Imperial,Orange,Riverside,San Diego	
Pala Band of Mission Indians	F	Christopher Nejo, Legal Analyst/Researcher	PMB 50, 35008 Pala Temecula Road Pala, CA, 92059	(760) 891-3564		cnejo@palatribe.com	Cupeno Luiseno	Orange,Riverside,San Bernardino,San Diego	11/27/2023
Pala Band of Mission Indians	F	Shasta Gaughen, Tribal Historic Preservation Officer	PMB 50, 35008 Pala Temecula Road Pala, CA, 92059	(760) 891-3515		sgaughen@palatribe.com	Cupeno Luiseno	Orange,Riverside,San Bernardino,San Diego	11/27/2023
Pala Band of Mission Indians	F	Alexis Wallick, Assistant THPO	PMB 50, 35008 Pala Temecula Road Pala, CA, 92059	(760) 891-3537		awallick@palatribe.com	Cupeno Luiseno	Orange,Riverside,San Bernardino,San Diego	11/27/2023
Pauma Band of Luiseno Indians	F	Temet Aguilar, Chairperson	P.O. Box 369 Pauma Valley, CA, 92061	(760) 742-1289	(760) 742-3422	bennaecalac@aol.com	Luiseno	Orange,Riverside,San Diego	
Pechanga Band of Indians	F	Tuba Ebru Ozdil, Pechanga Cultural Analyst	P.O. Box 2183 Temecula, CA, 92593	(951) 770-6313	(951) 695-1778	eozdil@pechanga-nsn.gov	Luiseno	Los Angeles,Orange,Riverside,San Bernardino,San Diego,Santa Barbara,Ventura	8/2/2023
Pechanga Band of Indians	F	Steve Bodmer, General Counsel for Pechanga Band of Indians	P.O. Box 1477 Temecula, CA, 92593	(951) 770-6171	(951) 695-1778	sbodmer@pechanga-nsn.gov	Luiseno	Los Angeles,Orange,Riverside,San Bernardino,San Diego,Santa Barbara,Ventura	8/2/2023
Rincon Band of Luiseno Indians	F	Cheryl Madrigal, Cultural Resources Manager/Tribal Historic Preservation Officer	One Government Center Lane Valley Center, CA, 92082	(760) 648-3000		cmadrigal@rincon-nsn.gov	Luiseno	Los Angeles,Orange,Riverside,San Bernardino,San Diego,Santa Barbara,Ventura	5/31/2023
Rincon Band of Luiseno Indians	F	Denise Turner Walsh, Attorney General	One Government Center Lane Valley Center, CA, 92082	(760) 689-5727		dwalsh@rincon-nsn.gov	Luiseno	Los Angeles,Orange,Riverside,San Bernardino,San Diego,Santa Barbara,Ventura	7/7/2023
Rincon Band of Luiseno Indians	F	Joseph Linton, Tribal Council/Culture Committee Member	One Government Center Lane Valley Center, CA, 92082	(760) 803-3548		jlinton@rincon-nsn.gov	Luiseno	Los Angeles,Orange,Riverside,San Bernardino,San Diego,Santa Barbara,Ventura	5/31/2023
Rincon Band of Luiseno Indians	F	Laurie Gonzalez, Tribal Council/Culture Committee Member	One Government Center Lane Valley Center, CA, 92082	(760) 484-4835		lgonzalez@rincon-nsn.gov	Luiseno	Los Angeles,Orange,Riverside,San Bernardino,San Diego,Santa Barbara,Ventura	5/31/2023
San Luis Rey Band of Mission Indians	N	Carmen Mojado, Secretary of Goverment Affairs		(760) 724-8505	(760) 724-2172	cjmojado@slrmissionindians.org	Luiseno	Orange,Riverside,San Diego	10/24/2023

San Pasqual Band of Diegueno Mission Indians	F	John Flores, Environmental Coordinator	P. O. Box 365 Valley Center, CA, 92082	(760) 749-3200	(760) 749-3876	johnf@sanpasqualtribe.org	Diegueno	Imperial,San Diego	8/16/2016
San Pasqual Band of Diegueno Mission Indians	F	Allen Lawson, Chairperson	P.O. Box 365 Valley Center, CA, 92082	(760) 749-3200	(760) 749-3876	allenl@sanpasqualtribe.org	Diegueno	Imperial,San Diego	
Soboba Band of Luiseno Indians	F	Joseph Ontiveros, Tribal Historic Preservation Officer	P.O. Box 487 San Jacinto, CA, 92581	(951) 663-5279	(951) 654-4198	jontiveros@soboba-nsn.gov	Cahuilla Luiseno	Imperial,Los Angeles,Orange,Riverside,San Bernardino,San Diego	7/14/2023
Soboba Band of Luiseno Indians	F	Isaiah Vivanco, Chairperson	P.O. Box 487 San Jacinto, CA, 92581	(951) 654-5544	(951) 654-4198	ivivanco@soboba-nsn.com	Cahuilla Luiseno	Imperial,Los Angeles,Orange,Riverside,San Bernardino,San Diego	7/14/2023
Soboba Band of Luiseno Indians	F	Jessica Valdez, Cultural Resource Specialist	P.O. Box 487 San Jacinto, CA, 92581	(951) 663-6261	(951) 654-4198	jvaldez@soboba-nsn.gov	Cahuilla Luiseno	Imperial,Los Angeles,Orange,Riverside,San Bernardino,San Diego	7/14/2023
Sycuan Band of the Kumeyaay Nation	F	Bernice Paipa, Cultural Resource Specialist	Sycuan Cultural Center: 910 Willow Glen Drive El Cajon, CA, 92019	(619) 445-6917		bpaipa2@sycuan-nsn.gov	Kumeyaay	Imperial,San Diego	8/7/2023
Sycuan Band of the Kumeyaay Nation	F	Cody Martinez, Chairman	Sycuan Tribal Office: 1 Kwaaypaay Court El Cajon, CA, 92019	(619) 445-2613		cmartinez@sycuan-nsn.gov	Kumeyaay	Imperial,San Diego	8/7/2023
Viejas Band of Kumeyaay Indians	F	Ray Teran, Resource Management Director	1 Viejas Grade Road Alpine, CA, 91901	(619) 659-2312		rteran@viejas-nsn.gov	Kumeyaay	Imperial,San Diego	6/29/2023
Viejas Band of Kumeyaay Indians	F	Ernest Pingleton, THPO	1 Viejas Grade Road Alpine, CA, 91901	(619) 445-3810		epingleton@viejas-nsn.gov	Kumeyaay	Imperial,San Diego	6/29/2023

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 Trolley Place (PN # 15953) Project, San Diego County.

Record: PROJ-2024-000737
Report Type: List of Tribes
Counties: All
NAHC Group: All

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

February 14, 2024 15953

Tribal Council ,
San Luis Rey Band of Mission Indians
1889 Sunset Dr.
Vista, CA 92081

Subject: Information Request for the Trolley Place Project, Oceanside, San Diego County, California

Dear Tribal Council,

The Trolley Place Project (project) is located south of Oceanside Boulevard and the Sprinter/rail line and west of Olive Drive in the City of Oceanside, San Diego County, California (Figure 1). The project proposes residential development of approximately 300 to 400 units with associated amenities and comprises 5.86-acres. The project falls on Section 22 Township 11 South, Range 4 West in San Luis Rey U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

As part of the cultural resources study prepared for the proposed project, Dudek contacted the Native American Heritage Commission (NAHC) conducted a Sacred Lands file (SLF) search and a list of Native American individuals and/or tribal organizations who may have knowledge of cultural resources in or near the proposed project area. The NAHC emailed a response on February 13, 2024, which stated that the SLF search identified the presence of Native American cultural resources in the immediate project area.

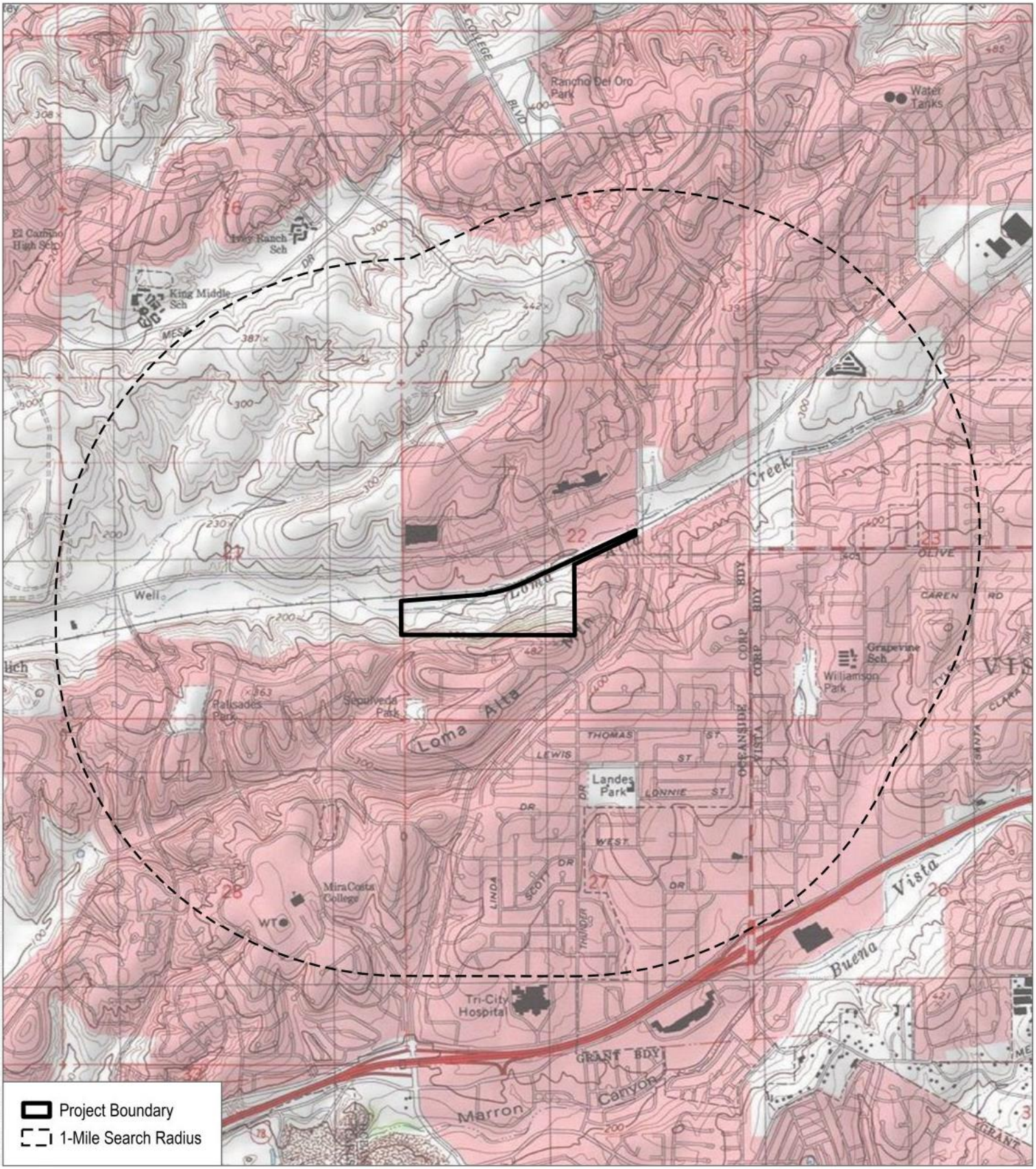
Please note that this letter does not constitute Assembly Bill (AB) 52 notification or initiation of consultation. Tribes that wish to be notified of projects for the purposes of consultation must contact the lead agency, The City of Oceanside (City), in writing (pursuant to Public Resources Code Section 21080.3.1 (b)).

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

Respectfully,

Makayla Murillo, B.A.
Archaeologist
DUDEK
Phone: (760) 846-5874
Email: mmurillo@dudek.com

Attachments: *Figure 1. Records Search Map*



SOURCE: USGS 7.5-Minute Topo Series 1:24,000

San Luis Rey Quadrangle - Township 11S Range 4W Section 22

DUDEK

0 500 1,000 Feet 0 260 520 Meters

Records Search

Trolley Place

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

February 14, 2024 15953

Mr. Temet Aguilar, Chairperson
Pauma & Yuima Reservation
P.O. Box 369
Pauma Valley, CA 92061

Subject: Information Request for the Trolley Place Project, Oceanside, San Diego County, California

Dear Mr. Aguilar,

The Trolley Place Project (project) is located south of Oceanside Boulevard and the Sprinter/rail line and west of Olive Drive in the City of Oceanside, San Diego County, California (Figure 1). The project proposes residential development of approximately 300 to 400 units with associated amenities and comprises 5.86-acres. The project falls on Section 22 Township 11 South, Range 4 West in San Luis Rey U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

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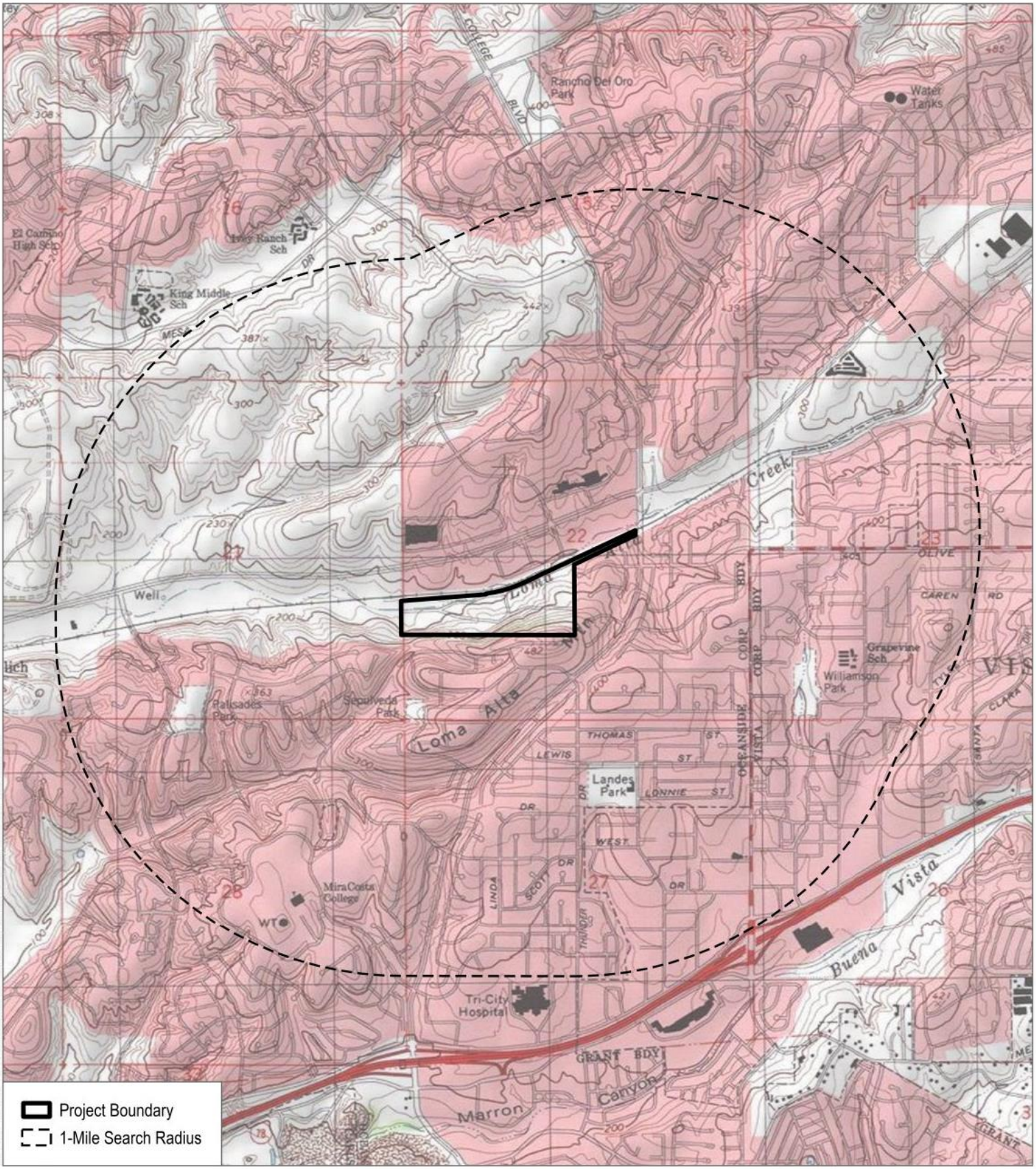

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San Luis Rey Quadrangle - Township 11S Range 4W Section 22

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Trolley Place

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T 800.450.1818 F 760.632.0164

February 14, 2024 15953

Ms. Norma Contreras, Chairperson
La Jolla Band of Mission Indians
22000 Highway 76
Pauma Valley, CA 92061

Subject: Information Request for the Trolley Place Project, Oceanside, San Diego County, California

Dear Ms. Contreras,

The Trolley Place Project (project) is located south of Oceanside Boulevard and the Sprinter/rail line and west of Olive Drive in the City of Oceanside, San Diego County, California (Figure 1). The project proposes residential development of approximately 300 to 400 units with associated amenities and comprises 5.86-acres. The project falls on Section 22 Township 11 South, Range 4 West in San Luis Rey U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

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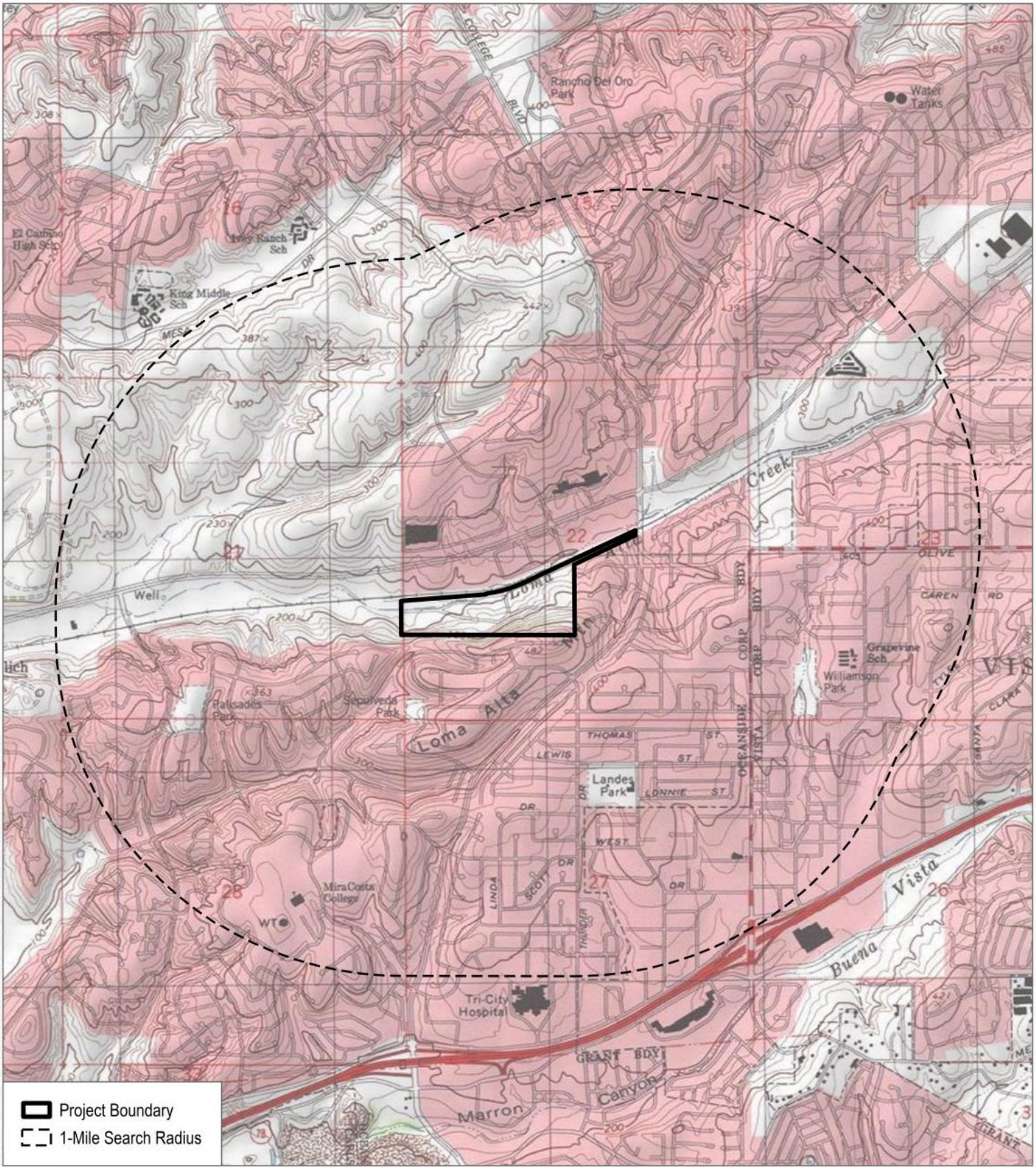

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February 14, 2024 15953

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

Subject: Information Request for the Trolley Place Project, Oceanside, San Diego County, California

Dear Ms. Cumper,

The Trolley Place Project (project) is located south of Oceanside Boulevard and the Sprinter/rail line and west of Olive Drive in the City of Oceanside, San Diego County, California (Figure 1). The project proposes residential development of approximately 300 to 400 units with associated amenities and comprises 5.86-acres. The project falls on Section 22 Township 11 South, Range 4 West in San Luis Rey U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

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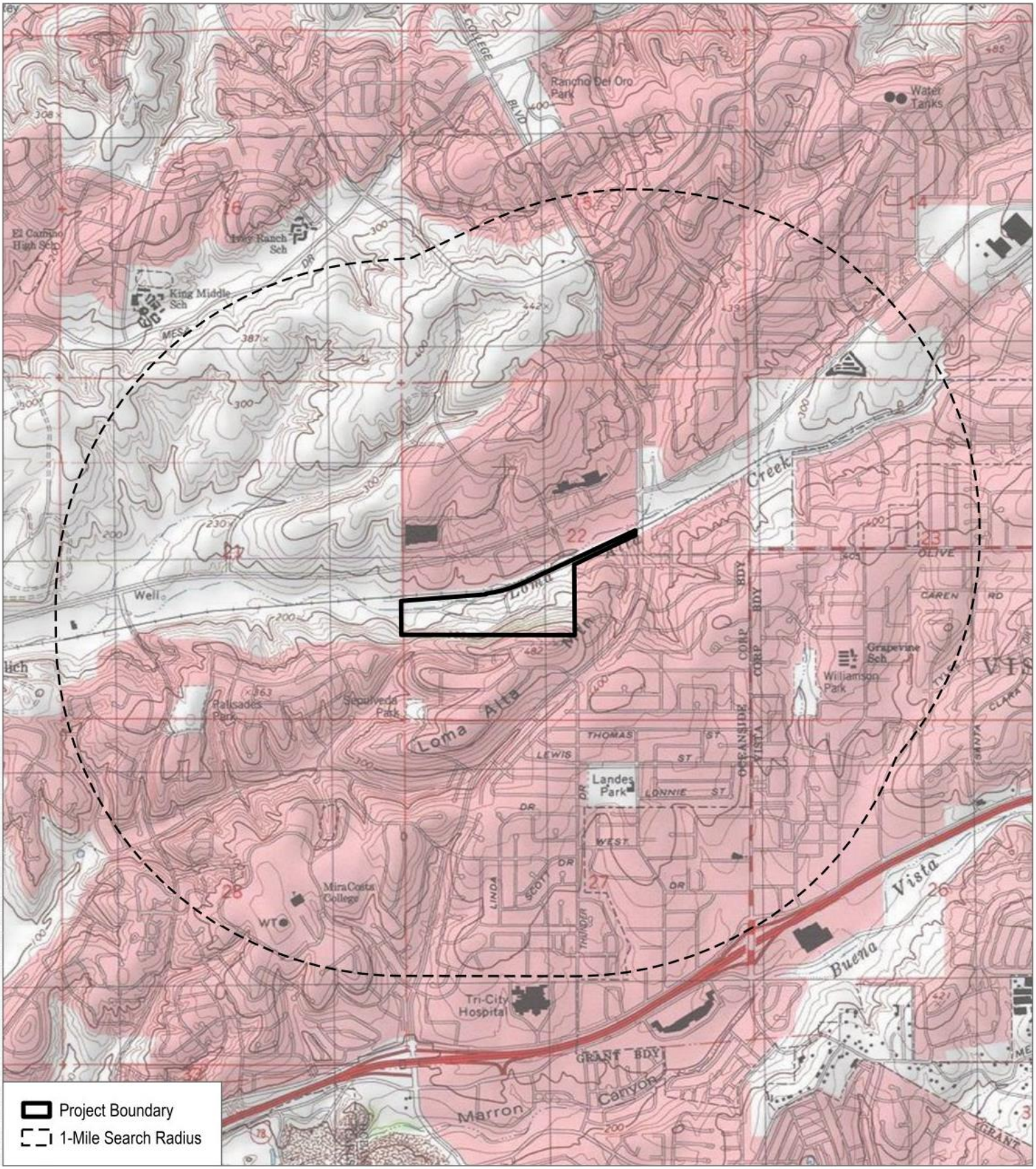

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February 14, 2024 15953

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 Trolley Place Project, Oceanside, San Diego County, California

Dear Mr. Flores,

The Trolley Place Project (project) is located south of Oceanside Boulevard and the Sprinter/rail line and west of Olive Drive in the City of Oceanside, San Diego County, California (Figure 1). The project proposes residential development of approximately 300 to 400 units with associated amenities and comprises 5.86-acres. The project falls on Section 22 Township 11 South, Range 4 West in San Luis Rey U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

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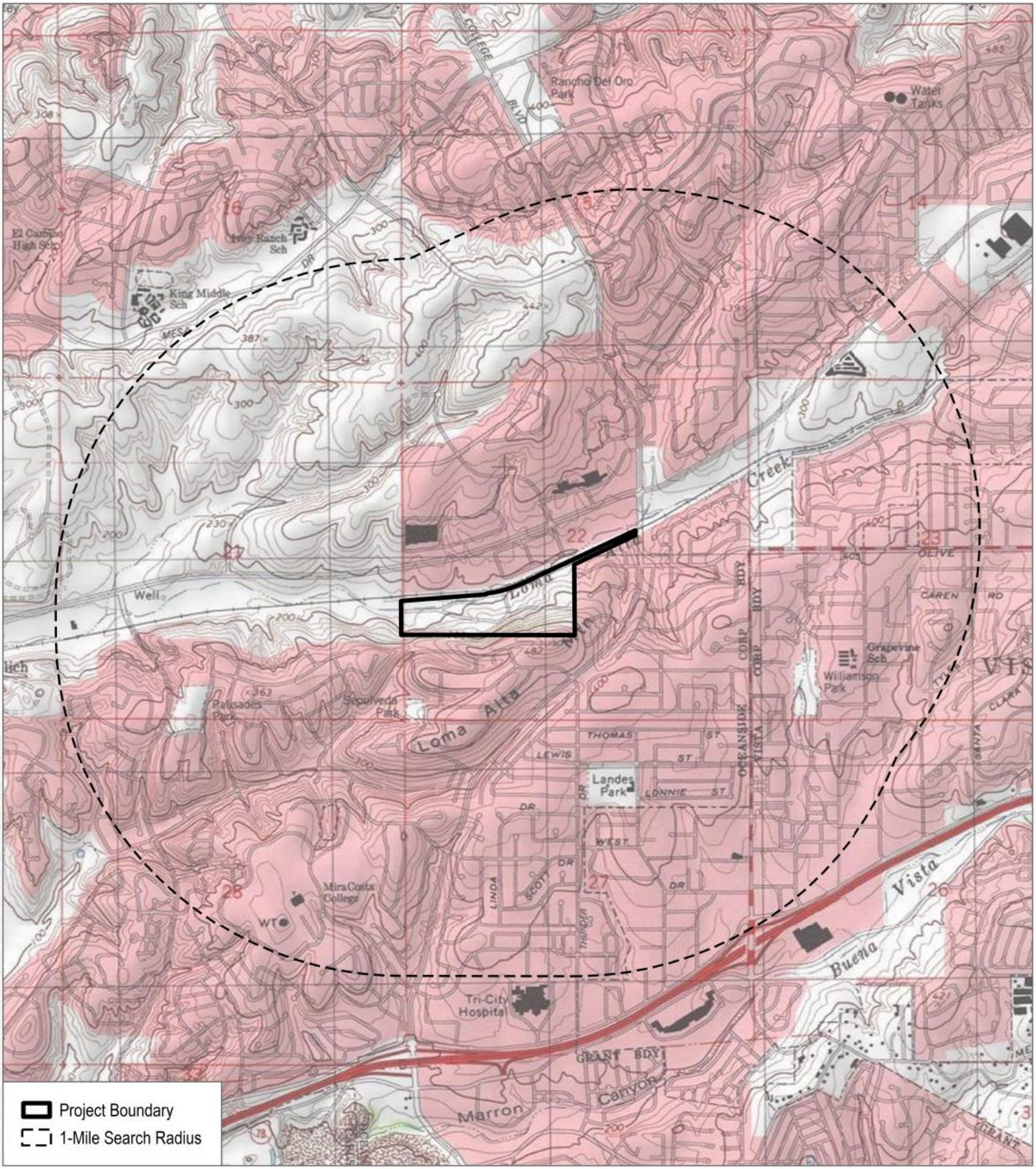

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February 14, 2024 15953

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

Subject: Information Request for the Trolley Place Project, Oceanside, San Diego County, California

Dear Mr. Garcia,

The Trolley Place Project (project) is located south of Oceanside Boulevard and the Sprinter/rail line and west of Olive Drive in the City of Oceanside, San Diego County, California (Figure 1). The project proposes residential development of approximately 300 to 400 units with associated amenities and comprises 5.86-acres. The project falls on Section 22 Township 11 South, Range 4 West in San Luis Rey U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

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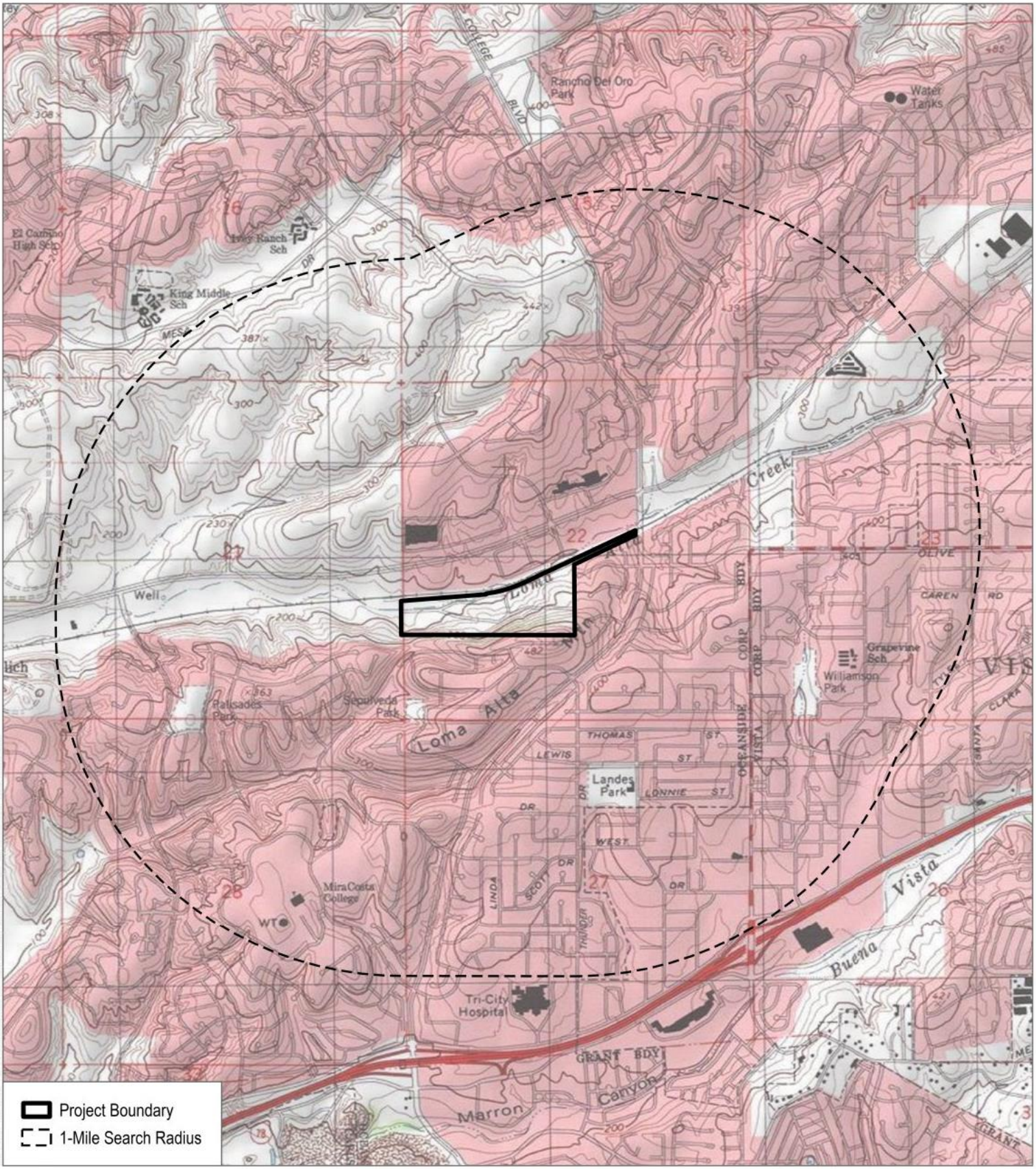
Please note that this letter does not constitute Assembly Bill (AB) 52 notification or initiation of consultation. Tribes that wish to be notified of projects for the purposes of consultation must contact the lead agency, The City of Oceanside (City), in writing (pursuant to Public Resources Code Section 21080.3.1 (b)).

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

Respectfully,

Makayla Murillo, B.A.
Archaeologist
DUDEK
Phone: (760) 846-5874
Email: mmurillo@dudek.com

Attachments: *Figure 1. Records Search Map*



SOURCE: USGS 7.5-Minute Topo Series 1:24,000

San Luis Rey Quadrangle - Township 11S Range 4W Section 22

DUDEK

0 500 1,000 Feet 0 260 520 Meters

Records Search

Trolley Place

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

February 14, 2024 15953

Ms. Shasta Gaughen, Tribal Historic Preservation Officer
Pala Band of Mission Indians
35008 Pala Temecula Rd.
Pala, CA 92059

Subject: Information Request for the Trolley Place Project, Oceanside, San Diego County, California

Dear Ms. Gaughen,

The Trolley Place Project (project) is located south of Oceanside Boulevard and the Sprinter/rail line and west of Olive Drive in the City of Oceanside, San Diego County, California (Figure 1). The project proposes residential development of approximately 300 to 400 units with associated amenities and comprises 5.86-acres. The project falls on Section 22 Township 11 South, Range 4 West in San Luis Rey U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

As part of the cultural resources study prepared for the proposed project, Dudek contacted the Native American Heritage Commission (NAHC) conducted a Sacred Lands file (SLF) search and a list of Native American individuals and/or tribal organizations who may have knowledge of cultural resources in or near the proposed project area. The NAHC emailed a response on February 13, 2024, which stated that the SLF search identified the presence of Native American cultural resources in the immediate project area.

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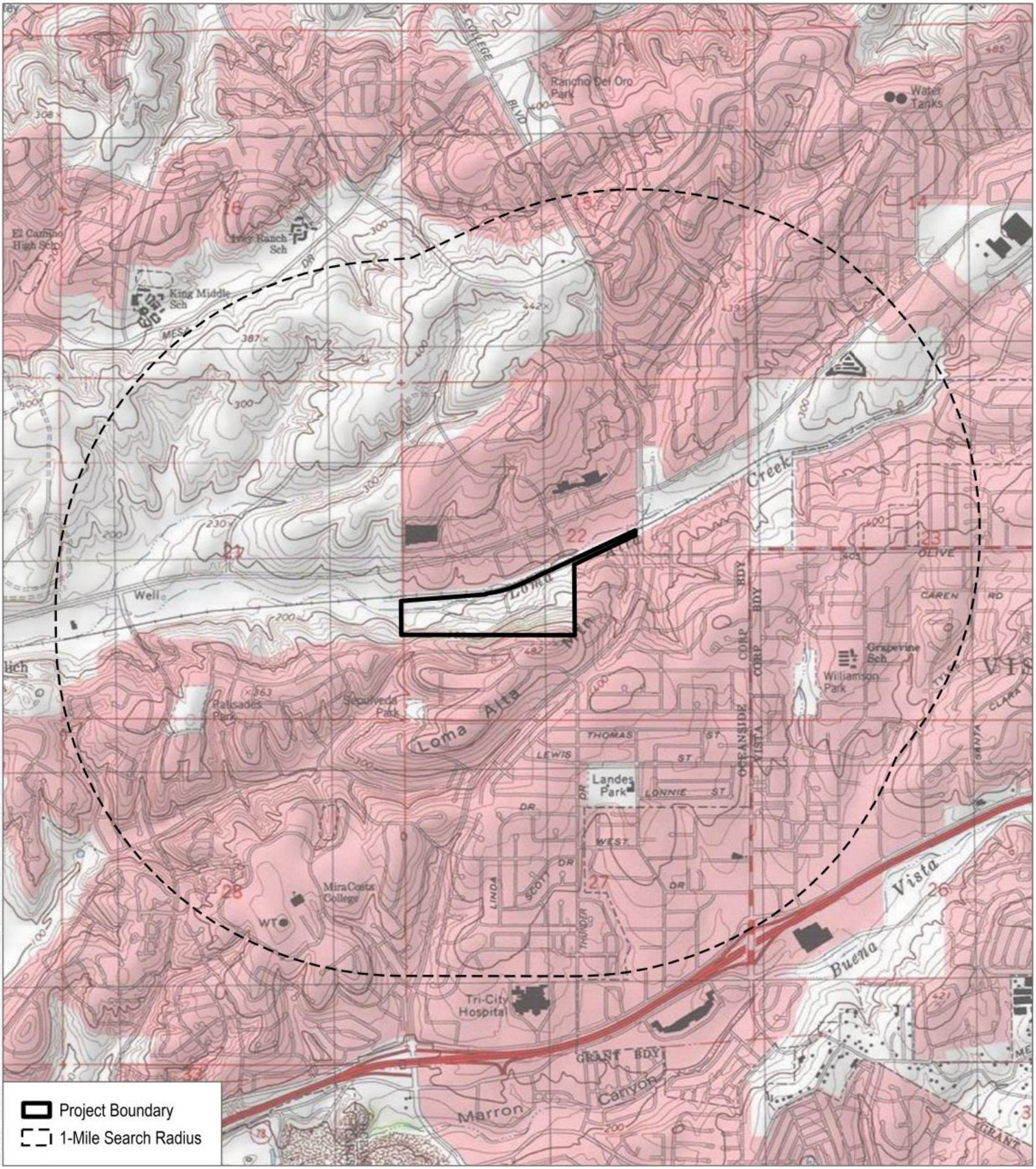

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San Luis Rey Quadrangle - Township 11S Range 4W Section 22

DUDEK

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Records Search

Trolley Place

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

February 14, 2024 15953

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

Subject: Information Request for the Trolley Place Project, Oceanside, San Diego County, California

Dear Mr. Goff,

The Trolley Place Project (project) is located south of Oceanside Boulevard and the Sprinter/rail line and west of Olive Drive in the City of Oceanside, San Diego County, California (Figure 1). The project proposes residential development of approximately 300 to 400 units with associated amenities and comprises 5.86-acres. The project falls on Section 22 Township 11 South, Range 4 West in San Luis Rey U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

As part of the cultural resources study prepared for the proposed project, Dudek contacted the Native American Heritage Commission (NAHC) conducted a Sacred Lands file (SLF) search and a list of Native American individuals and/or tribal organizations who may have knowledge of cultural resources in or near the proposed project area. The NAHC emailed a response on February 13, 2024, which stated that the SLF search identified the presence of Native American cultural resources in the immediate project area.

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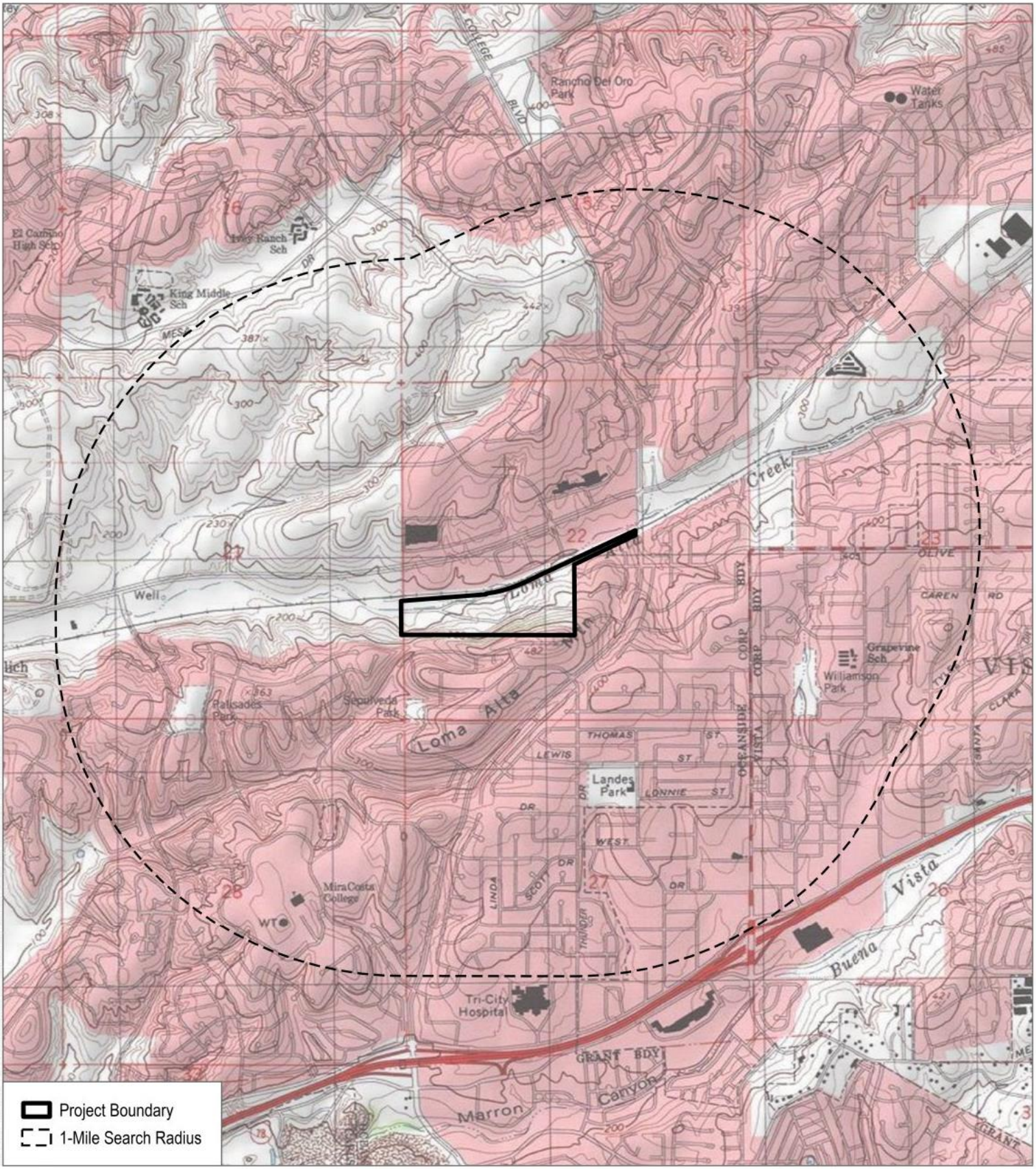

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San Luis Rey Quadrangle - Township 11S Range 4W Section 22

DUDEK

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Records Search

Trolley Place

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

February 14, 2024 15953

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 Trolley Place Project, Oceanside, San Diego County, California

Dear Mr. Lawson,

The Trolley Place Project (project) is located south of Oceanside Boulevard and the Sprinter/rail line and west of Olive Drive in the City of Oceanside, San Diego County, California (Figure 1). The project proposes residential development of approximately 300 to 400 units with associated amenities and comprises 5.86-acres. The project falls on Section 22 Township 11 South, Range 4 West in San Luis Rey U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

As part of the cultural resources study prepared for the proposed project, Dudek contacted the Native American Heritage Commission (NAHC) conducted a Sacred Lands file (SLF) search and a list of Native American individuals and/or tribal organizations who may have knowledge of cultural resources in or near the proposed project area. The NAHC emailed a response on February 13, 2024, which stated that the SLF search identified the presence of Native American cultural resources in the immediate project area.

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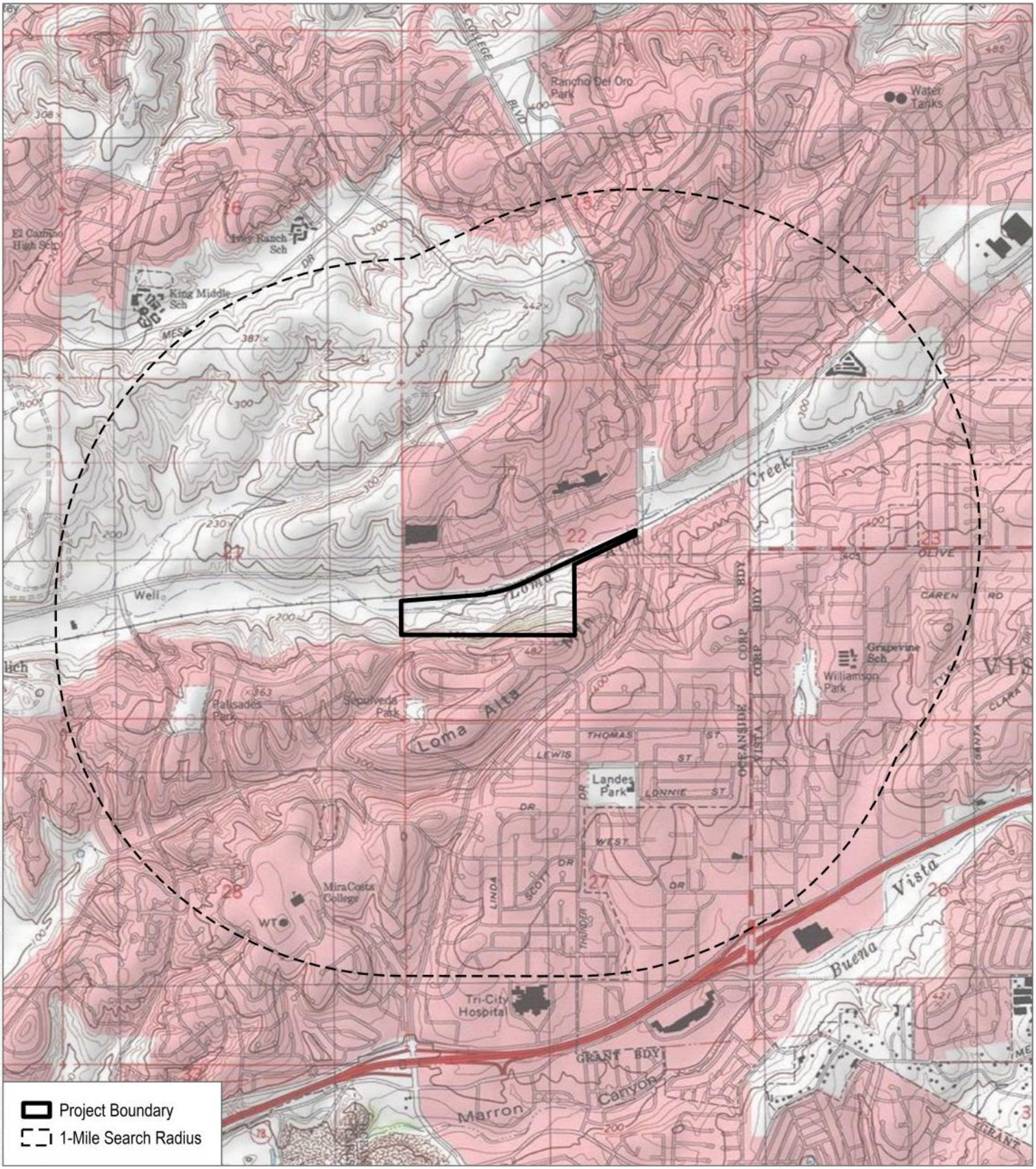

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San Luis Rey Quadrangle - Township 11S Range 4W Section 22

DUDEK

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Records Search

Trolley Place

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

February 14, 2024 15953

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

Subject: Information Request for the Trolley Place Project, Oceanside, San Diego County, California

Dear Mr. Linton,

The Trolley Place Project (project) is located south of Oceanside Boulevard and the Sprinter/rail line and west of Olive Drive in the City of Oceanside, San Diego County, California (Figure 1). The project proposes residential development of approximately 300 to 400 units with associated amenities and comprises 5.86-acres. The project falls on Section 22 Township 11 South, Range 4 West in San Luis Rey U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

As part of the cultural resources study prepared for the proposed project, Dudek contacted the Native American Heritage Commission (NAHC) conducted a Sacred Lands file (SLF) search and a list of Native American individuals and/or tribal organizations who may have knowledge of cultural resources in or near the proposed project area. The NAHC emailed a response on February 13, 2024, which stated that the SLF search identified the presence of Native American cultural resources in the immediate project area.

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Archaeologist
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Email: mmurillo@dudek.com

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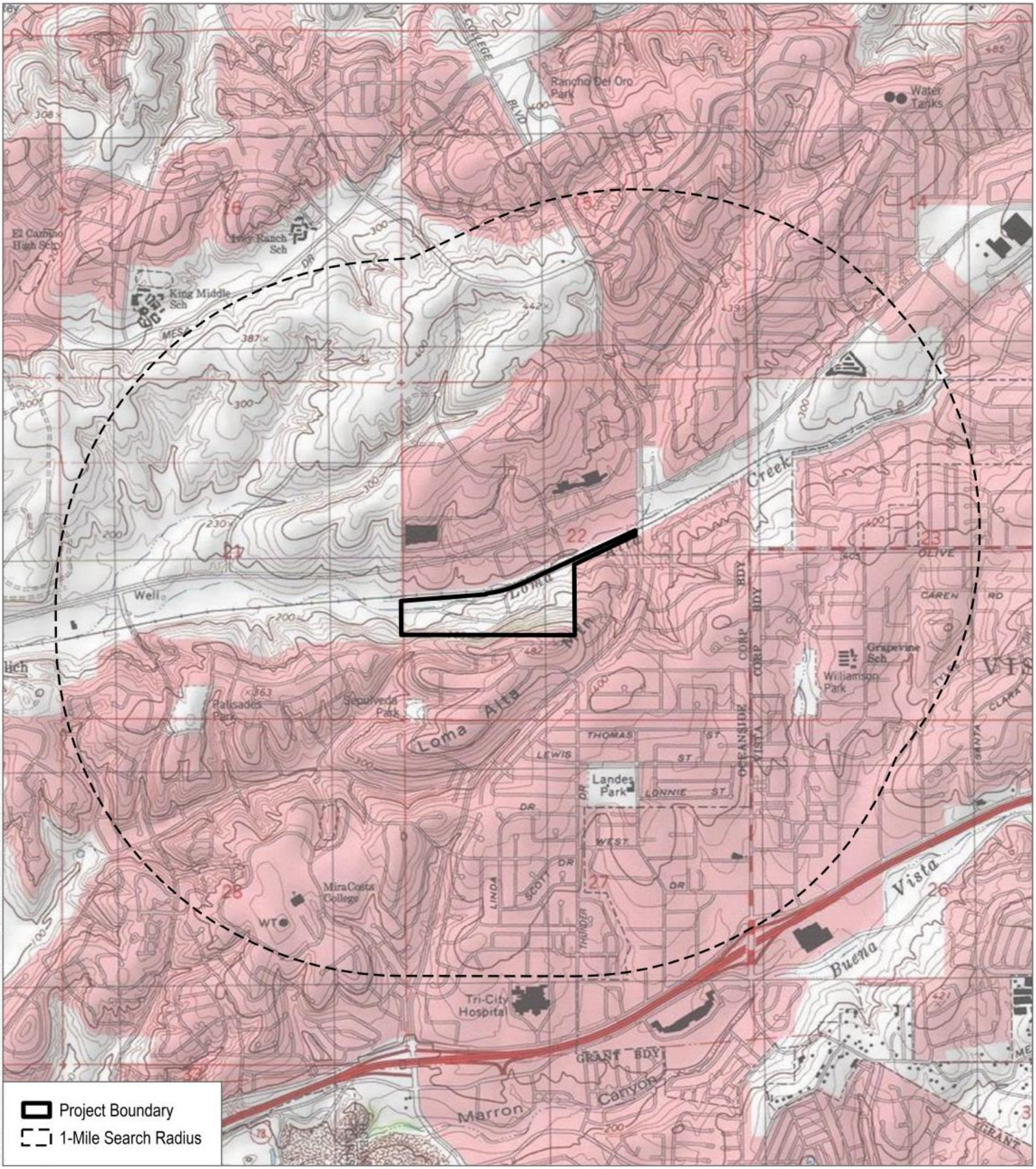

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San Luis Rey Quadrangle - Township 11S Range 4W Section 22

DUDEK

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Records Search

Trolley Place

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

February 14, 2024 15953

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 Trolley Place Project, Oceanside, San Diego County, California

Dear Mr. Linton,

The Trolley Place Project (project) is located south of Oceanside Boulevard and the Sprinter/rail line and west of Olive Drive in the City of Oceanside, San Diego County, California (Figure 1). The project proposes residential development of approximately 300 to 400 units with associated amenities and comprises 5.86-acres. The project falls on Section 22 Township 11 South, Range 4 West in San Luis Rey U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

As part of the cultural resources study prepared for the proposed project, Dudek contacted the Native American Heritage Commission (NAHC) conducted a Sacred Lands file (SLF) search and a list of Native American individuals and/or tribal organizations who may have knowledge of cultural resources in or near the proposed project area. The NAHC emailed a response on February 13, 2024, which stated that the SLF search identified the presence of Native American cultural resources in the immediate project area.

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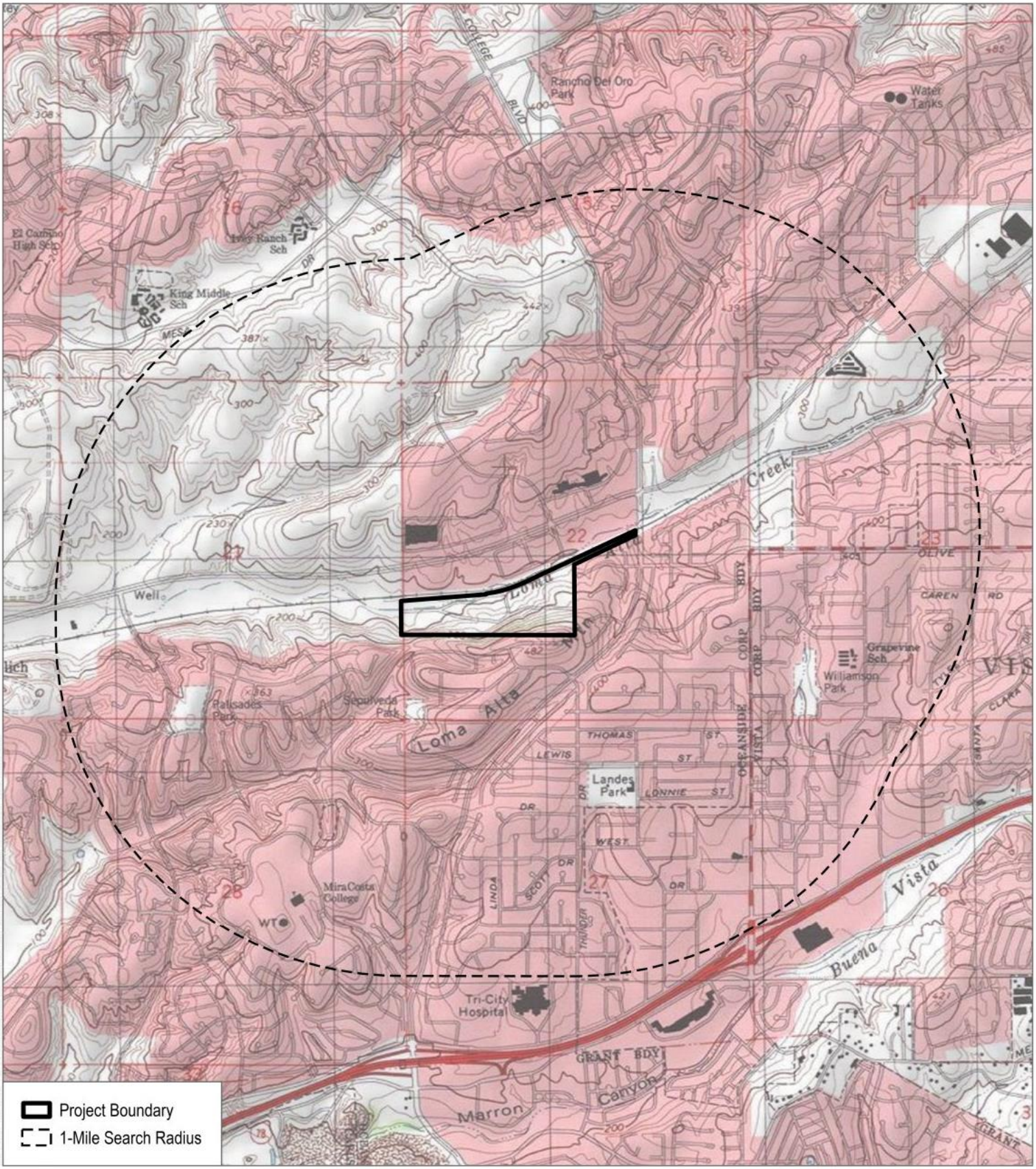

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San Luis Rey Quadrangle - Township 11S Range 4W Section 22

DUDEK

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Records Search

Trolley Place

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

February 14, 2024 15953

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

Subject: Information Request for the Trolley Place Project, Oceanside, San Diego County, California

Dear Ms. Lucas,

The Trolley Place Project (project) is located south of Oceanside Boulevard and the Sprinter/rail line and west of Olive Drive in the City of Oceanside, San Diego County, California (Figure 1). The project proposes residential development of approximately 300 to 400 units with associated amenities and comprises 5.86-acres. The project falls on Section 22 Township 11 South, Range 4 West in San Luis Rey U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

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Respectfully,

Makayla Murillo, B.A.
Archaeologist
DUDEK
Phone: (760) 846-5874
Email: mmurillo@dudek.com

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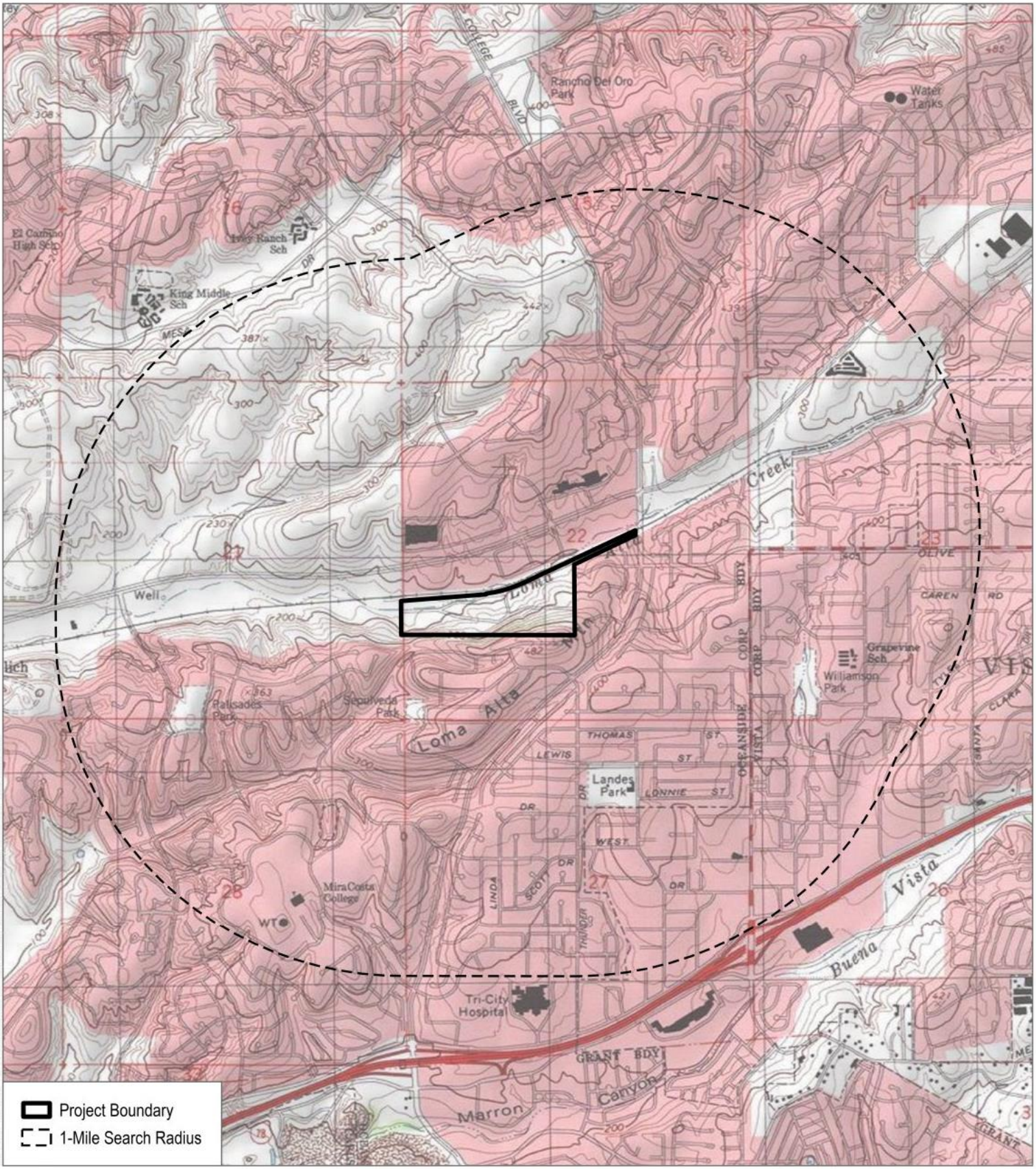

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San Luis Rey Quadrangle - Township 11S Range 4W Section 22

DUDEK

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Records Search

Trolley Place

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

February 14, 2024 15953

Ms. Heidi Lucero, Chairperson
Juaneno Band of Mission Indians Acjachemen Nation
31411-A La Matanza Street
San Juan Capistrano, CA 92675

Subject: Information Request for the Trolley Place Project, Oceanside, San Diego County, California

Dear Ms. Lucero,

The Trolley Place Project (project) is located south of Oceanside Boulevard and the Sprinter/rail line and west of Olive Drive in the City of Oceanside, San Diego County, California (Figure 1). The project proposes residential development of approximately 300 to 400 units with associated amenities and comprises 5.86-acres. The project falls on Section 22 Township 11 South, Range 4 West in San Luis Rey U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

As part of the cultural resources study prepared for the proposed project, Dudek contacted the Native American Heritage Commission (NAHC) conducted a Sacred Lands file (SLF) search and a list of Native American individuals and/or tribal organizations who may have knowledge of cultural resources in or near the proposed project area. The NAHC emailed a response on February 13, 2024, which stated that the SLF search identified the presence of Native American cultural resources in the immediate project area.

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Archaeologist
DUDEK
Phone: (760) 846-5874
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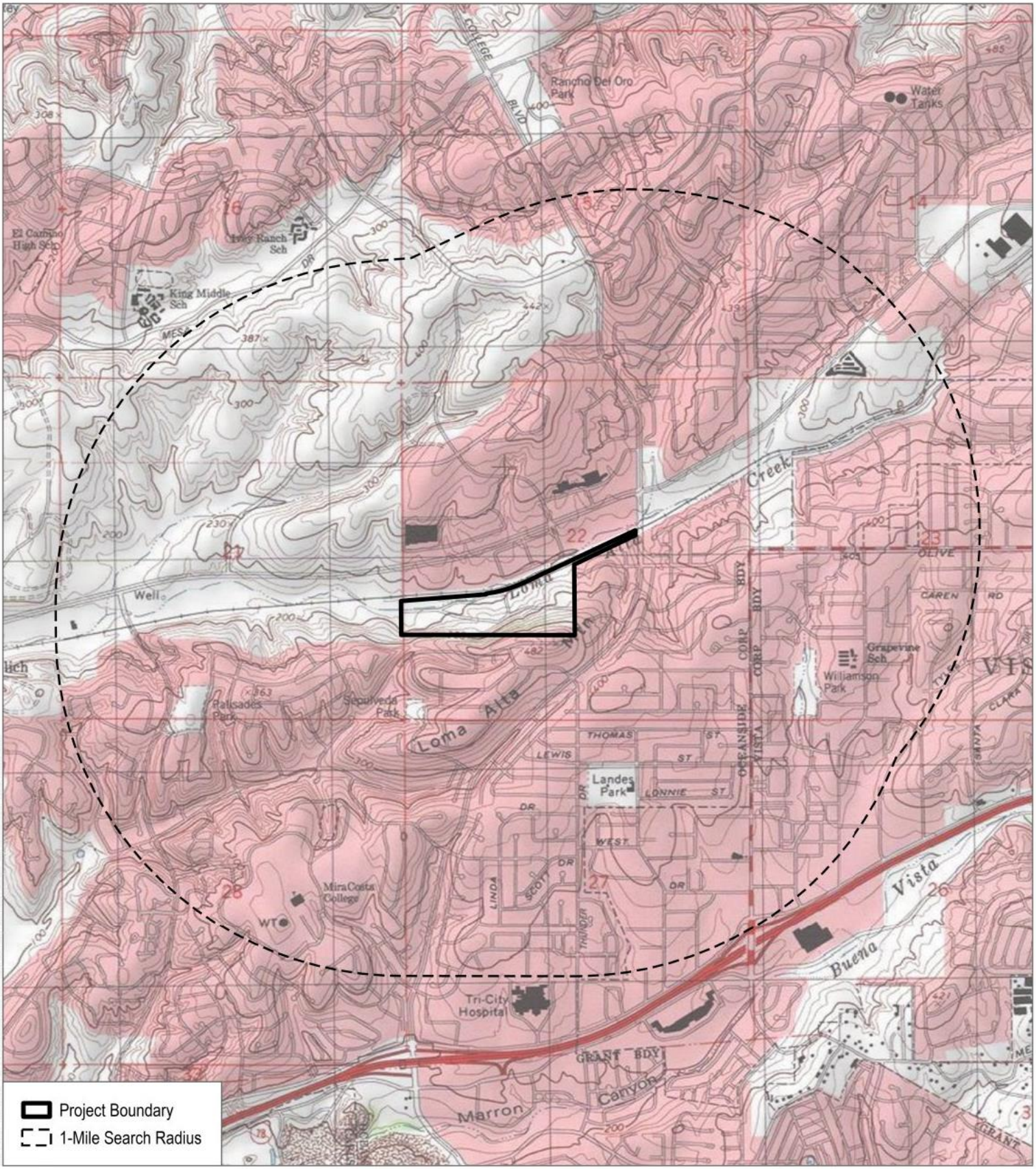

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San Luis Rey Quadrangle - Township 11S Range 4W Section 22

DUDEK

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Records Search

Trolley Place

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

February 14, 2024 15953

Mr. Steve Bodmer, General Counsel for Pechanga Band of Mission Indians
Pechanga Band of Mission Indians
P.O. Box 1477
Temecula, CA 92593

Subject: Information Request for the Trolley Place Project, Oceanside, San Diego County, California

Dear Mr. Bodmer,

The Trolley Place Project (project) is located south of Oceanside Boulevard and the Sprinter/rail line and west of Olive Drive in the City of Oceanside, San Diego County, California (Figure 1). The project proposes residential development of approximately 300 to 400 units with associated amenities and comprises 5.86-acres. The project falls on Section 22 Township 11 South, Range 4 West in San Luis Rey U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

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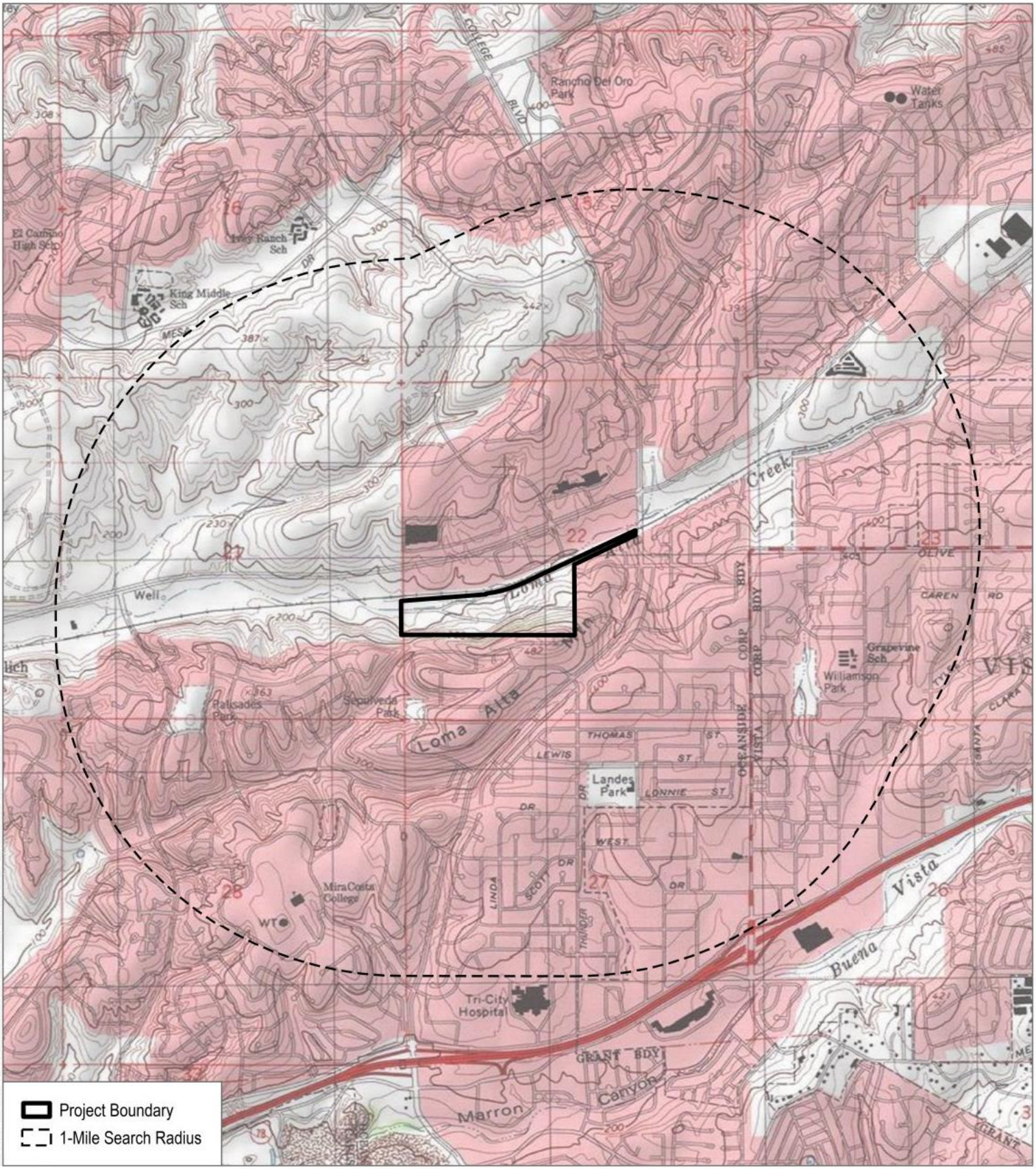

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San Luis Rey Quadrangle - Township 11S Range 4W Section 22

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Records Search

Trolley Place

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

February 14, 2024 15953

Ms. Cheryl Madrigal, Tribal Historic Preservation Officer
Rincon Band of Mission Indians
One Governement Center Lane
Valley Center, CA 92082

Subject: Information Request for the Trolley Place Project, Oceanside, San Diego County, California

Dear Ms. Madrigal,

The Trolley Place Project (project) is located south of Oceanside Boulevard and the Sprinter/rail line and west of Olive Drive in the City of Oceanside, San Diego County, California (Figure 1). The project proposes residential development of approximately 300 to 400 units with associated amenities and comprises 5.86-acres. The project falls on Section 22 Township 11 South, Range 4 West in San Luis Rey U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

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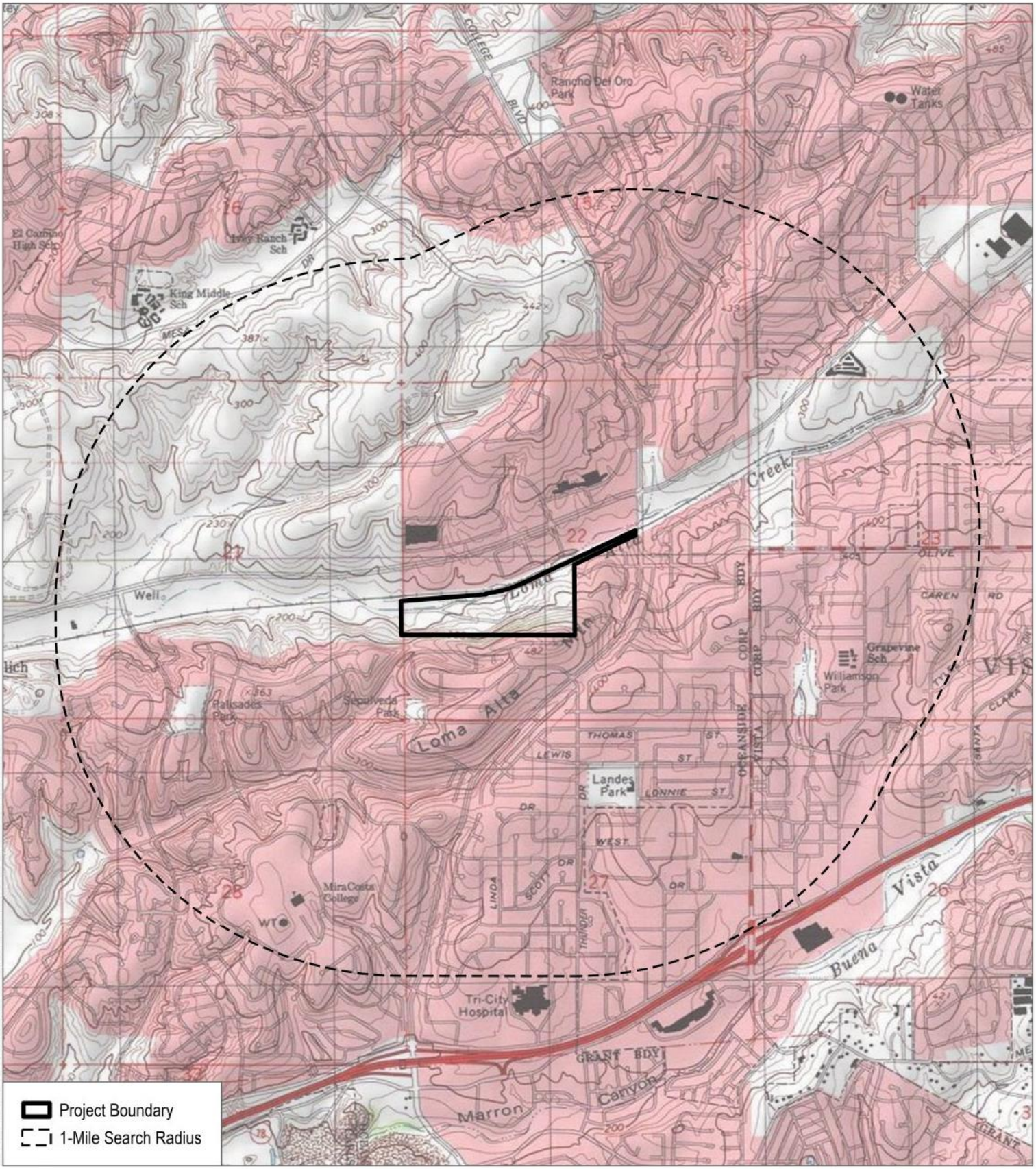

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San Luis Rey Quadrangle - Township 11S Range 4W Section 22

DUDEK

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Records Search

Trolley Place

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

February 14, 2024 15953

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

Subject: Information Request for the Trolley Place Project, Oceanside, San Diego County, California

Dear Mr. Martinez,

The Trolley Place Project (project) is located south of Oceanside Boulevard and the Sprinter/rail line and west of Olive Drive in the City of Oceanside, San Diego County, California (Figure 1). The project proposes residential development of approximately 300 to 400 units with associated amenities and comprises 5.86-acres. The project falls on Section 22 Township 11 South, Range 4 West in San Luis Rey U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

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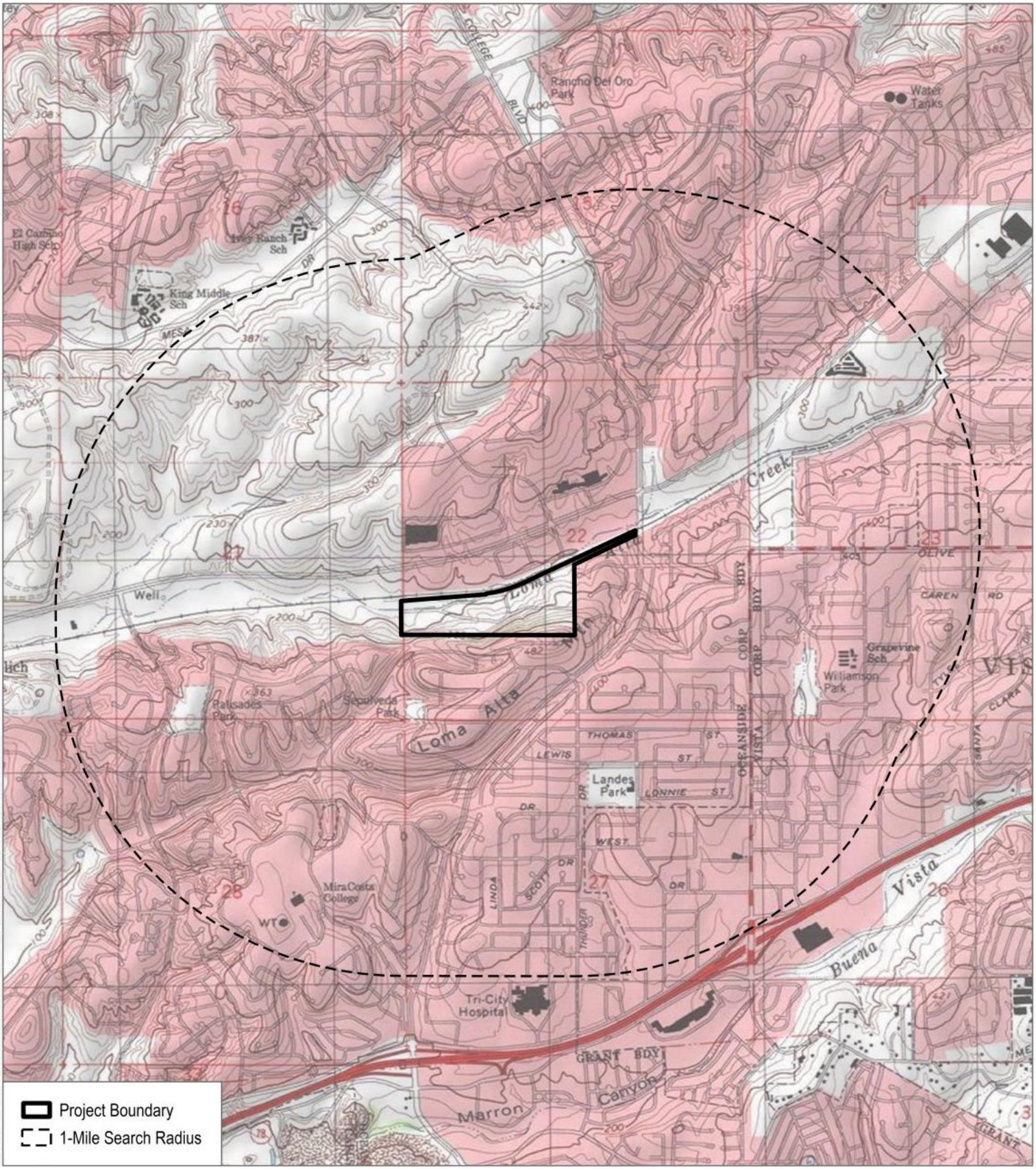

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Trolley Place

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

February 14, 2024 15953

Mr. Christopher Nejo, Legal Analyst/Researcher
Mesa Grande Band of Mission Indians
35008 Pala Temecula Rd. #366
Pala, CA 92059

Subject: Information Request for the Trolley Place Project, Oceanside, San Diego County, California

Dear Mr. Nejo,

The Trolley Place Project (project) is located south of Oceanside Boulevard and the Sprinter/rail line and west of Olive Drive in the City of Oceanside, San Diego County, California (Figure 1). The project proposes residential development of approximately 300 to 400 units with associated amenities and comprises 5.86-acres. The project falls on Section 22 Township 11 South, Range 4 West in San Luis Rey U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

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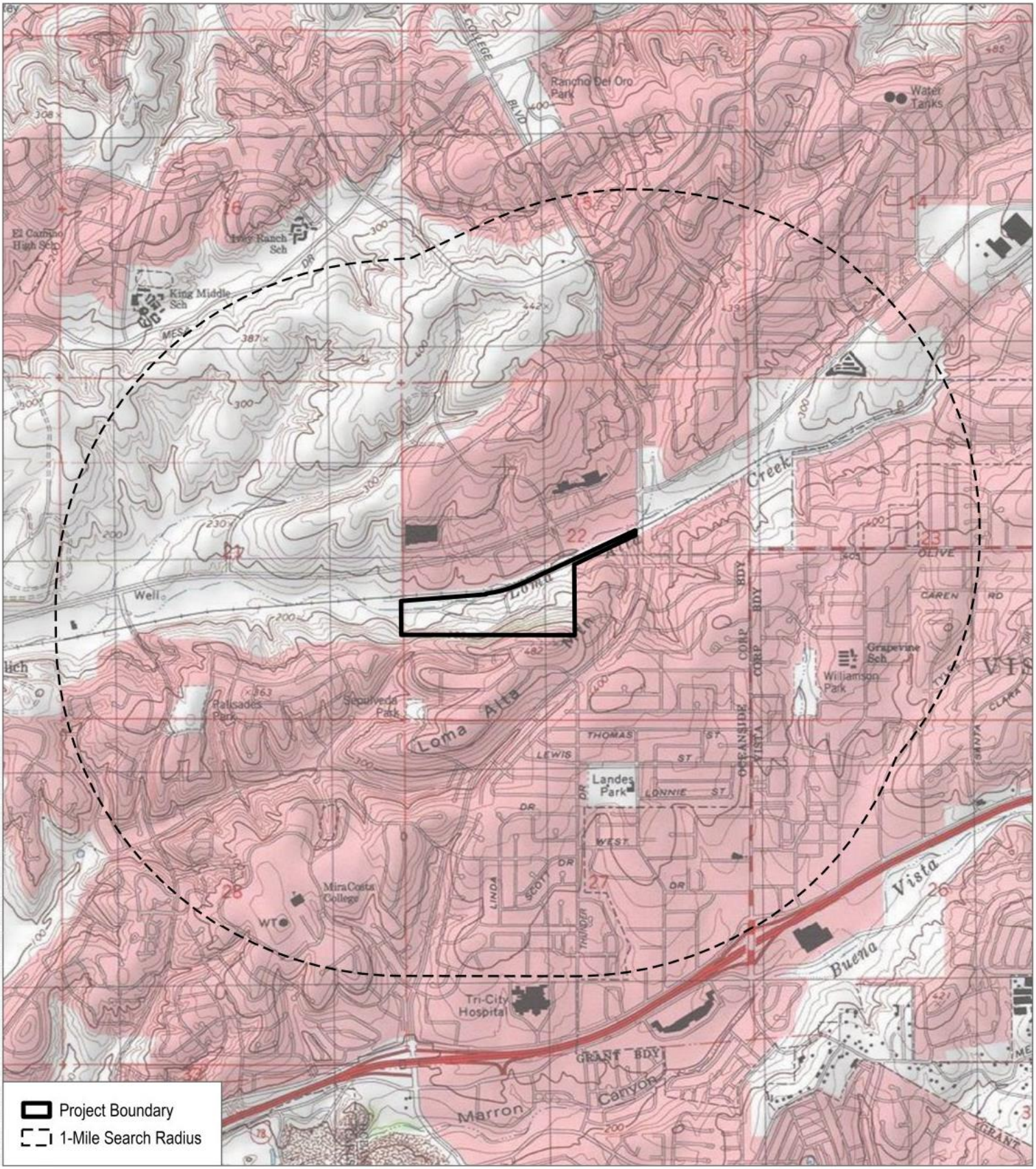
Email: mmurillo@dudek.com

Attachments: *Figure 1. Records Search Map*



SOURCE: USGS 7.5-Minute Topo Series 1:24,000

San Luis Rey Quadrangle - Township 11S Range 4W Section 22

DUDEK

0 500 1,000 Feet 0 260 520 Meters

Records Search

Trolley Place

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

February 14, 2024 15953

Ms. Jessica Valdez, cultural Resource Specialist
Soboba Band of Mission Indians
P.O. Box 487
San Jacinto, CA 92581

Subject: Information Request for the Trolley Place Project, Oceanside, San Diego County, California

Dear Ms. Valdez,

The Trolley Place Project (project) is located south of Oceanside Boulevard and the Sprinter/rail line and west of Olive Drive in the City of Oceanside, San Diego County, California (Figure 1). The project proposes residential development of approximately 300 to 400 units with associated amenities and comprises 5.86-acres. The project falls on Section 22 Township 11 South, Range 4 West in San Luis Rey U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

As part of the cultural resources study prepared for the proposed project, Dudek contacted the Native American Heritage Commission (NAHC) conducted a Sacred Lands file (SLF) search and a list of Native American individuals and/or tribal organizations who may have knowledge of cultural resources in or near the proposed project area. The NAHC emailed a response on February 13, 2024, which stated that the SLF search identified the presence of Native American cultural resources in the immediate project area.

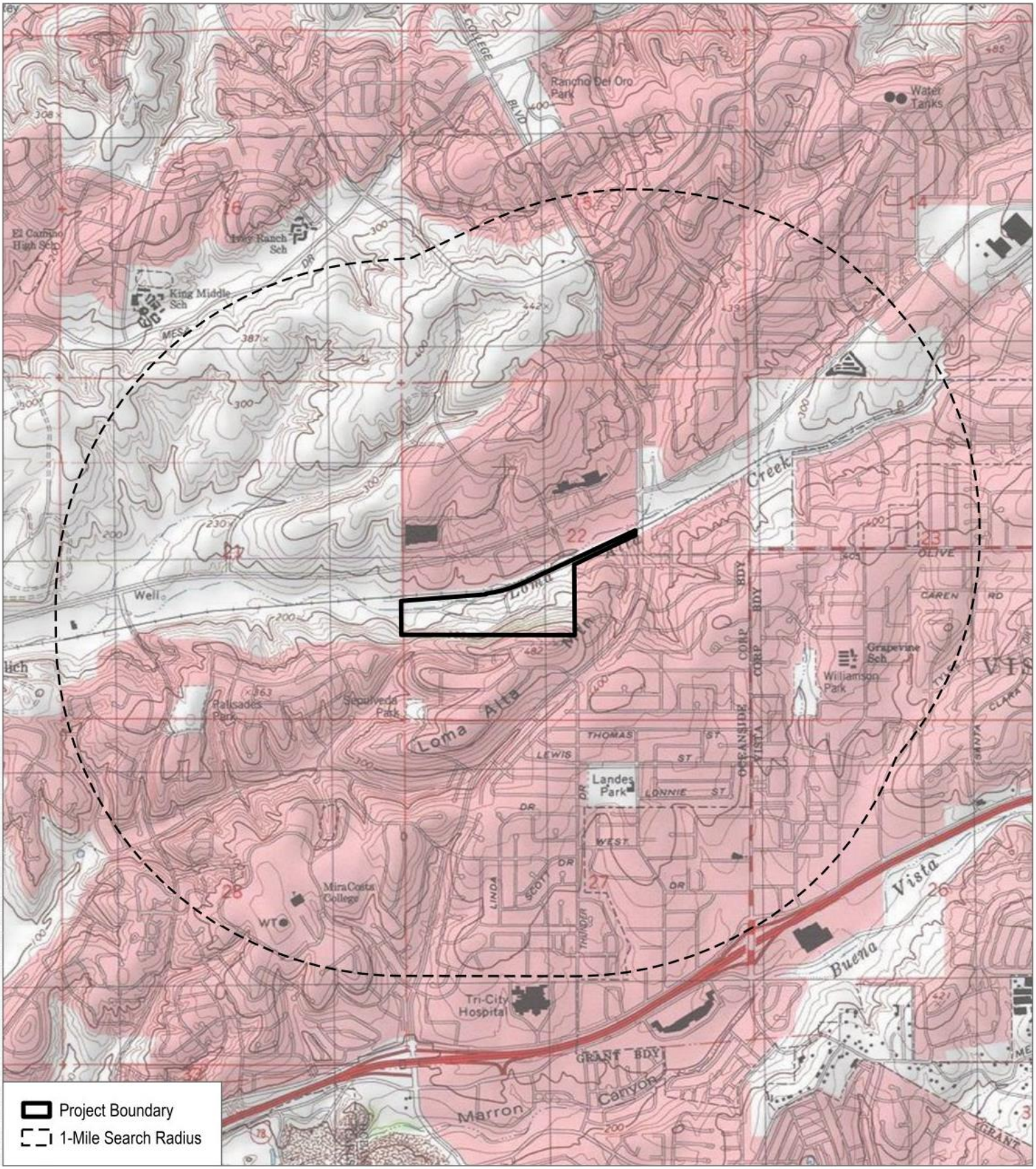
Please note that this letter does not constitute Assembly Bill (AB) 52 notification or initiation of consultation. Tribes that wish to be notified of projects for the purposes of consultation must contact the lead agency, The City of Oceanside (City), in writing (pursuant to Public Resources Code Section 21080.3.1 (b)).

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

Respectfully,

Makayla Murillo, B.A.
Archaeologist
DUDEK
Phone: (760) 846-5874
Email: mmurillo@dudek.com

Attachments: *Figure 1. Records Search Map*



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San Luis Rey Quadrangle - Township 11S Range 4W Section 22

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Records Search

Trolley Place

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MAIN OFFICE
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ENCINITAS, CALIFORNIA 92024
T 800.450.1818 F 760.632.0164

February 14, 2024 15953

Mr. Joseph Ontiveros, Cultural Resource Department
Soboba Band of Luiseno Indians
P.O. Box 487
San Jacinto, CA 92581

Subject: Information Request for the Trolley Place Project, Oceanside, San Diego County, California

Dear Mr. Ontiveros,

The Trolley Place Project (project) is located south of Oceanside Boulevard and the Sprinter/rail line and west of Olive Drive in the City of Oceanside, San Diego County, California (Figure 1). The project proposes residential development of approximately 300 to 400 units with associated amenities and comprises 5.86-acres. The project falls on Section 22 Township 11 South, Range 4 West in San Luis Rey U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

As part of the cultural resources study prepared for the proposed project, Dudek contacted the Native American Heritage Commission (NAHC) conducted a Sacred Lands file (SLF) search and a list of Native American individuals and/or tribal organizations who may have knowledge of cultural resources in or near the proposed project area. The NAHC emailed a response on February 13, 2024, which stated that the SLF search identified the presence of Native American cultural resources in the immediate project area.

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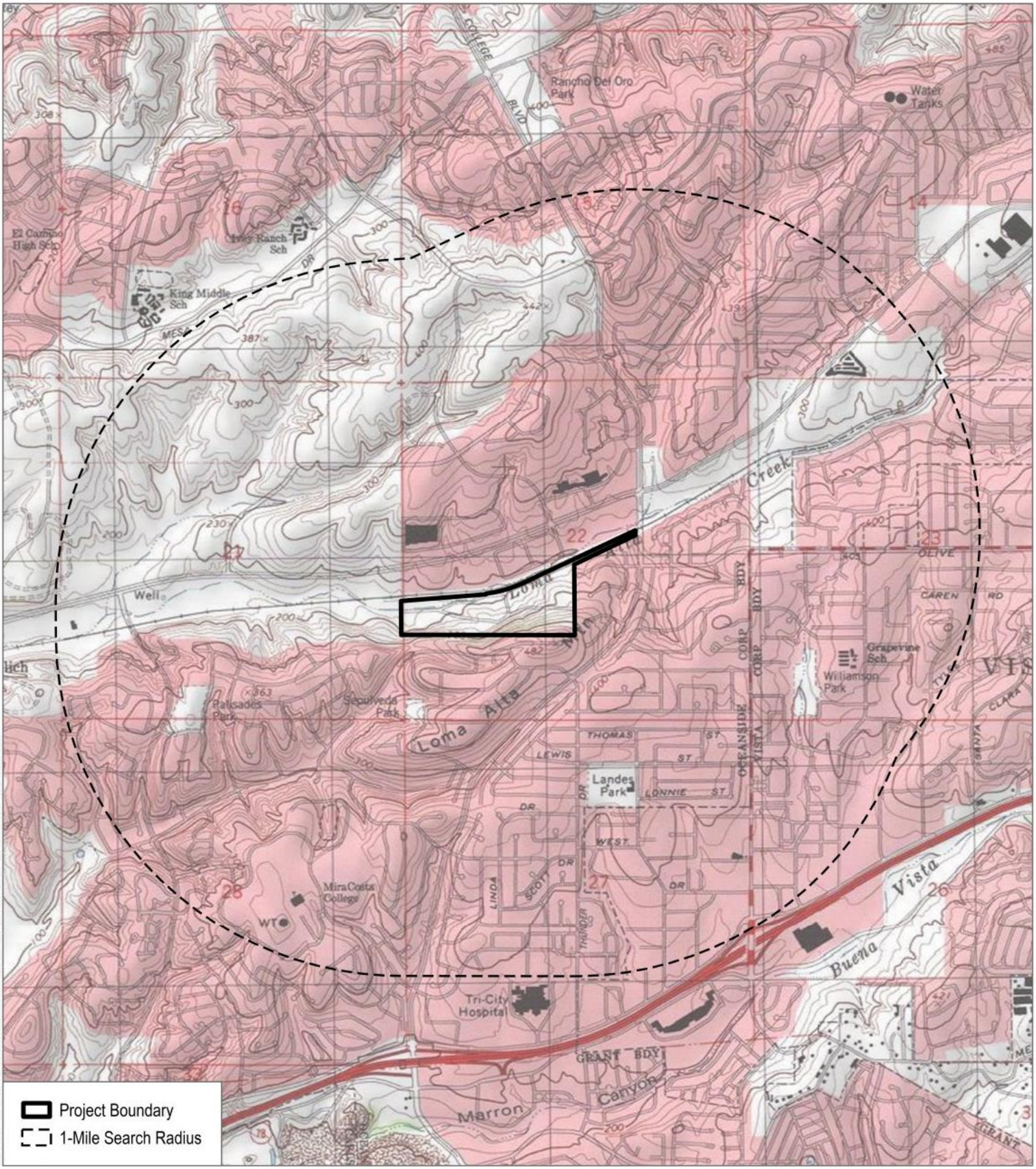

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San Luis Rey Quadrangle - Township 11S Range 4W Section 22

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Records Search

Trolley Place

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MAIN OFFICE
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ENCINITAS, CALIFORNIA 92024
T 800.450.1818 F 760.632.0164

February 14, 2024 15953

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

Subject: Information Request for the Trolley Place Project, Oceanside, San Diego County, California

Dear Ms. Osuna,

The Trolley Place Project (project) is located south of Oceanside Boulevard and the Sprinter/rail line and west of Olive Drive in the City of Oceanside, San Diego County, California (Figure 1). The project proposes residential development of approximately 300 to 400 units with associated amenities and comprises 5.86-acres. The project falls on Section 22 Township 11 South, Range 4 West in San Luis Rey U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

As part of the cultural resources study prepared for the proposed project, Dudek contacted the Native American Heritage Commission (NAHC) conducted a Sacred Lands file (SLF) search and a list of Native American individuals and/or tribal organizations who may have knowledge of cultural resources in or near the proposed project area. The NAHC emailed a response on February 13, 2024, which stated that the SLF search identified the presence of Native American cultural resources in the immediate project area.

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Respectfully,

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Archaeologist
DUDEK
Phone: (760) 846-5874
Email: mmurillo@dudek.com

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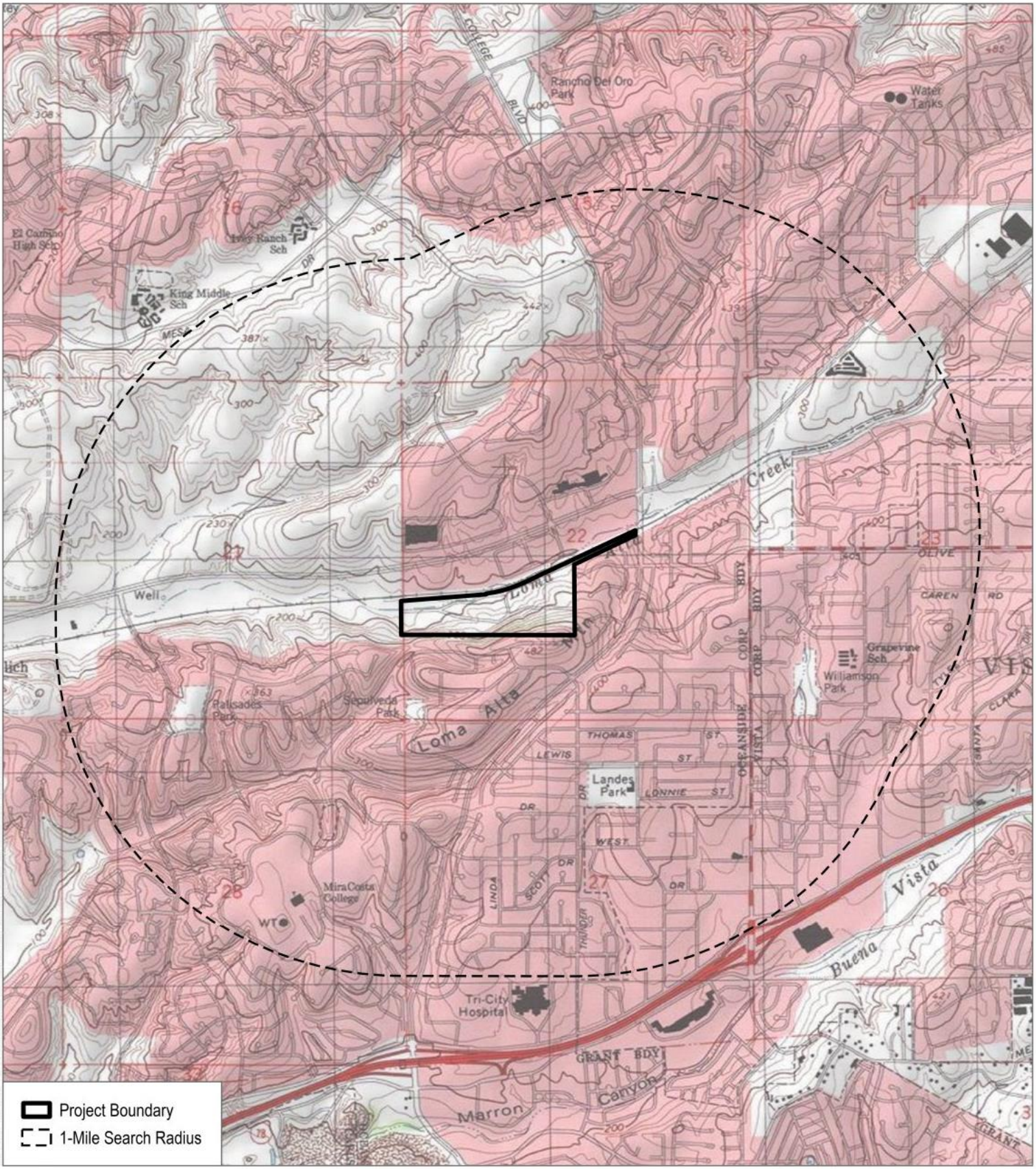

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San Luis Rey Quadrangle - Township 11S Range 4W Section 22

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Records Search

Trolley Place

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

February 14, 2024 15953

Ms. Tuba Ebru Ozdil, Cultural Resources Planning Specialist
Pechanga Band of Mission Indians
P.O. Box 1477
Temecula, CA 92593

Subject: Information Request for the Trolley Place Project, Oceanside, San Diego County, California

Dear Ms. Ozdil,

The Trolley Place Project (project) is located south of Oceanside Boulevard and the Sprinter/rail line and west of Olive Drive in the City of Oceanside, San Diego County, California (Figure 1). The project proposes residential development of approximately 300 to 400 units with associated amenities and comprises 5.86-acres. The project falls on Section 22 Township 11 South, Range 4 West in San Luis Rey U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

As part of the cultural resources study prepared for the proposed project, Dudek contacted the Native American Heritage Commission (NAHC) conducted a Sacred Lands file (SLF) search and a list of Native American individuals and/or tribal organizations who may have knowledge of cultural resources in or near the proposed project area. The NAHC emailed a response on February 13, 2024, which stated that the SLF search identified the presence of Native American cultural resources in the immediate project area.

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

Respectfully,

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Archaeologist
DUDEK
Phone: (760) 846-5874
Email: mmurillo@dudek.com

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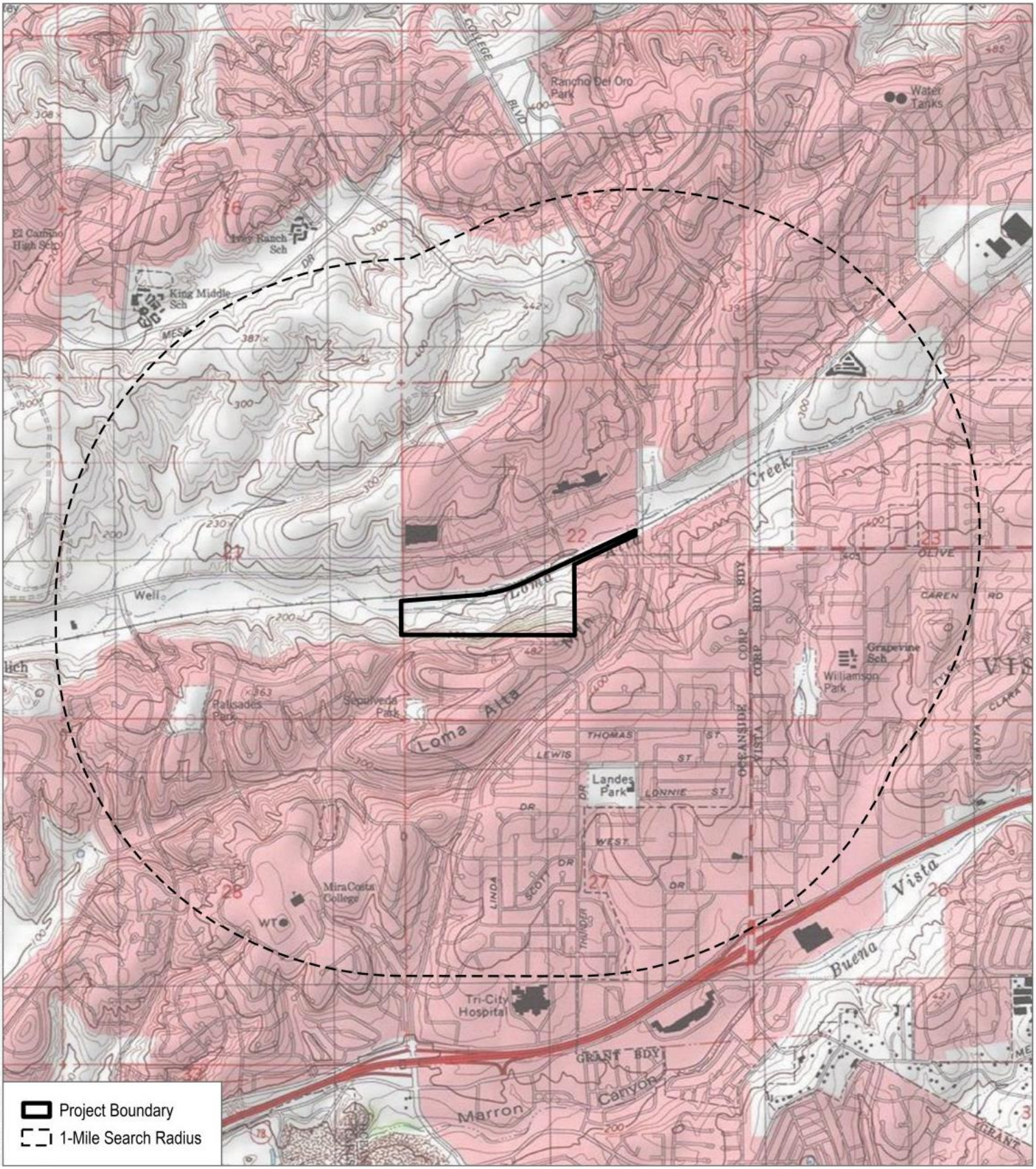

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San Luis Rey Quadrangle - Township 11S Range 4W Section 22

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Records Search

Trolley Place

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

February 14, 2024 15953

Ms. Bernice Paipa, Vice Spokesperson
Kumeyaay Cultural Repatriation Committee
P.O. Box 63
Santa Ysabel, CA 92070

Subject: Information Request for the Trolley Place Project, Oceanside, San Diego County, California

Dear Ms. Paipa,

The Trolley Place Project (project) is located south of Oceanside Boulevard and the Sprinter/rail line and west of Olive Drive in the City of Oceanside, San Diego County, California (Figure 1). The project proposes residential development of approximately 300 to 400 units with associated amenities and comprises 5.86-acres. The project falls on Section 22 Township 11 South, Range 4 West in San Luis Rey U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

As part of the cultural resources study prepared for the proposed project, Dudek contacted the Native American Heritage Commission (NAHC) conducted a Sacred Lands file (SLF) search and a list of Native American individuals and/or tribal organizations who may have knowledge of cultural resources in or near the proposed project area. The NAHC emailed a response on February 13, 2024, which stated that the SLF search identified the presence of Native American cultural resources in the immediate project area.

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Respectfully,

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Archaeologist
DUDEK
Phone: (760) 846-5874
Email: mmurillo@dudek.com

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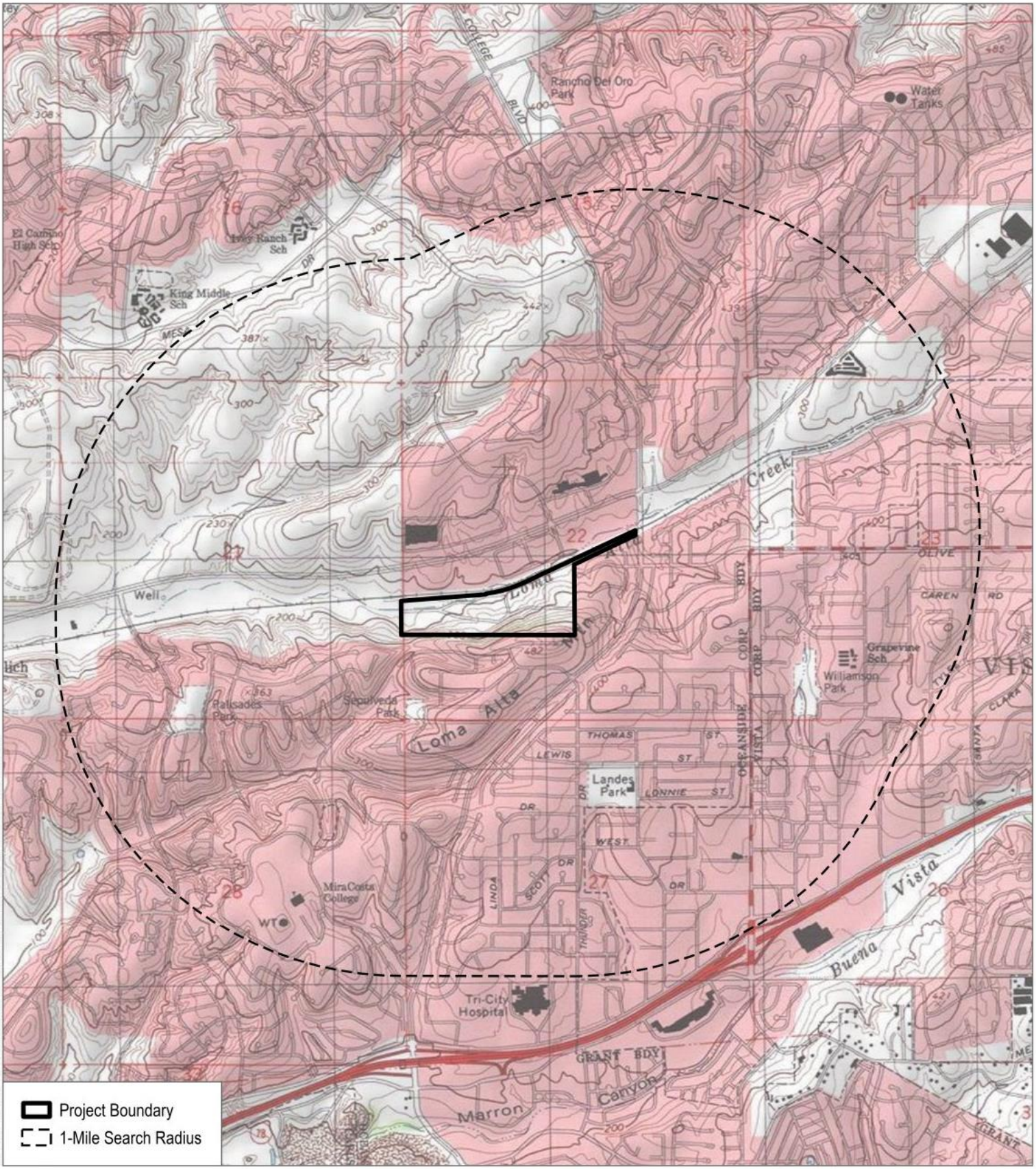

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San Luis Rey Quadrangle - Township 11S Range 4W Section 22

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Records Search

Trolley Place

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

February 14, 2024 15953

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

Subject: Information Request for the Trolley Place Project, Oceanside, San Diego County, California

Dear Ms. Parada,

The Trolley Place Project (project) is located south of Oceanside Boulevard and the Sprinter/rail line and west of Olive Drive in the City of Oceanside, San Diego County, California (Figure 1). The project proposes residential development of approximately 300 to 400 units with associated amenities and comprises 5.86-acres. The project falls on Section 22 Township 11 South, Range 4 West in San Luis Rey U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

As part of the cultural resources study prepared for the proposed project, Dudek contacted the Native American Heritage Commission (NAHC) conducted a Sacred Lands file (SLF) search and a list of Native American individuals and/or tribal organizations who may have knowledge of cultural resources in or near the proposed project area. The NAHC emailed a response on February 13, 2024, which stated that the SLF search identified the presence of Native American cultural resources in the immediate project area.

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Respectfully,

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Archaeologist
DUDEK
Phone: (760) 846-5874
Email: mmurillo@dudek.com

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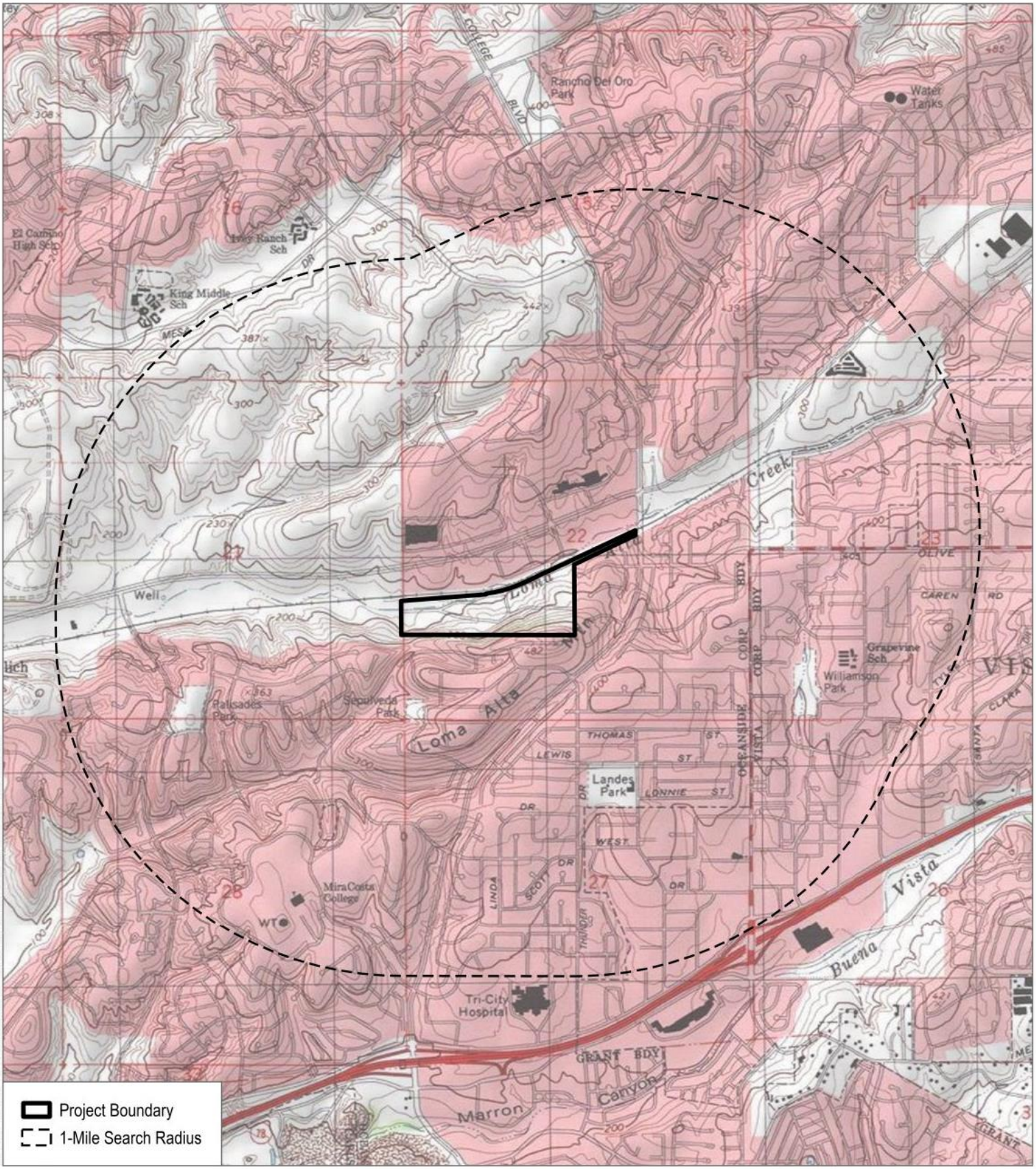

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San Luis Rey Quadrangle - Township 11S Range 4W Section 22

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Records Search

Trolley Place

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

February 14, 2024 15953

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

Subject: Information Request for the Trolley Place Project, Oceanside, San Diego County, California

Dear Mr. Pingleton,

The Trolley Place Project (project) is located south of Oceanside Boulevard and the Sprinter/rail line and west of Olive Drive in the City of Oceanside, San Diego County, California (Figure 1). The project proposes residential development of approximately 300 to 400 units with associated amenities and comprises 5.86-acres. The project falls on Section 22 Township 11 South, Range 4 West in San Luis Rey U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

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Respectfully,

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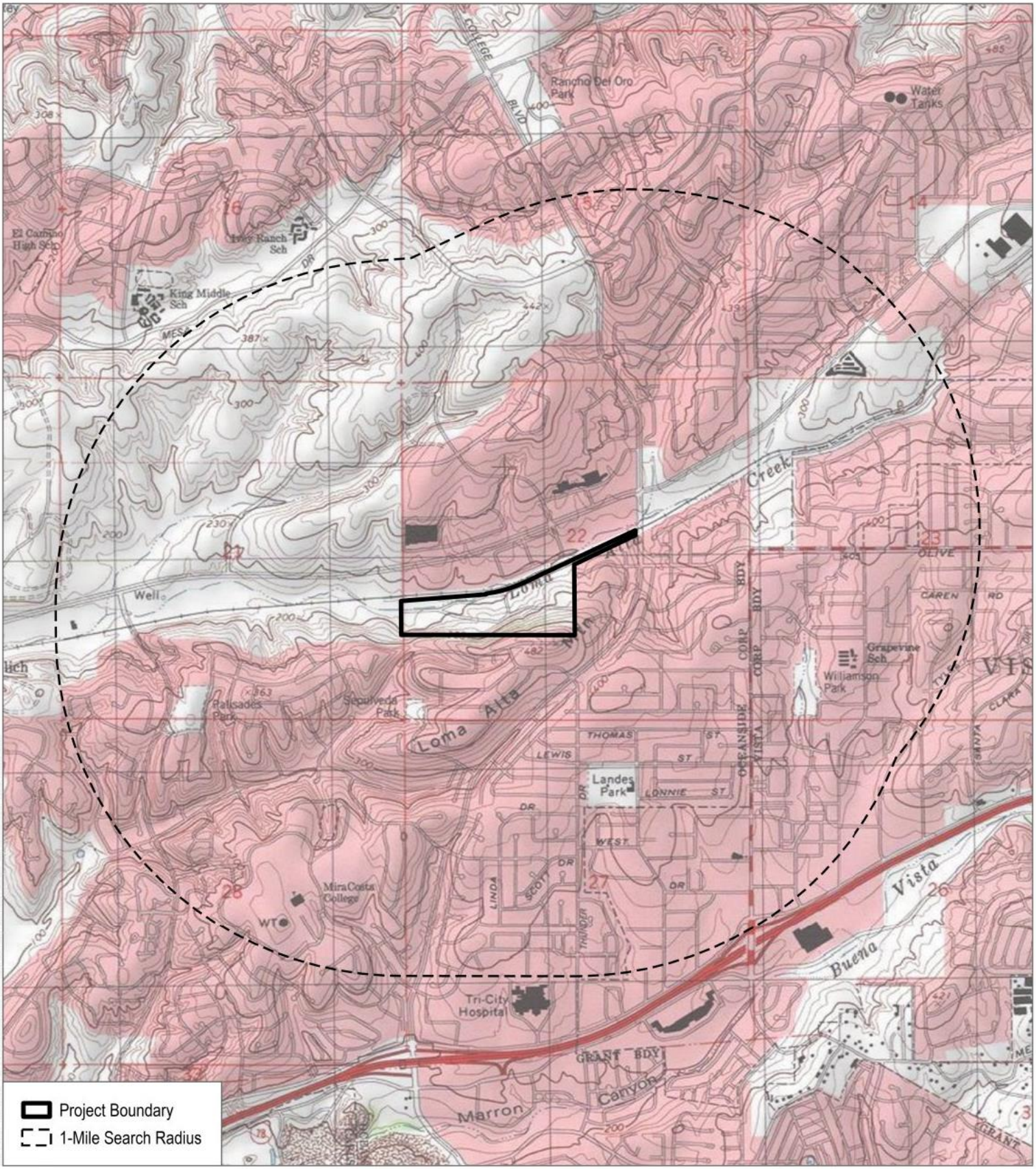
Archaeologist
DUDEK
Phone: (760) 846-5874
Email: mmurillo@dudek.com

Attachments: *Figure 1. Records Search Map*



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San Luis Rey Quadrangle - Township 11S Range 4W Section 22

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Records Search

Trolley Place

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

February 14, 2024 15953

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

Subject: Information Request for the Trolley Place Project, Oceanside, San Diego County, California

Dear Mr. Pinto,

The Trolley Place Project (project) is located south of Oceanside Boulevard and the Sprinter/rail line and west of Olive Drive in the City of Oceanside, San Diego County, California (Figure 1). The project proposes residential development of approximately 300 to 400 units with associated amenities and comprises 5.86-acres. The project falls on Section 22 Township 11 South, Range 4 West in San Luis Rey U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

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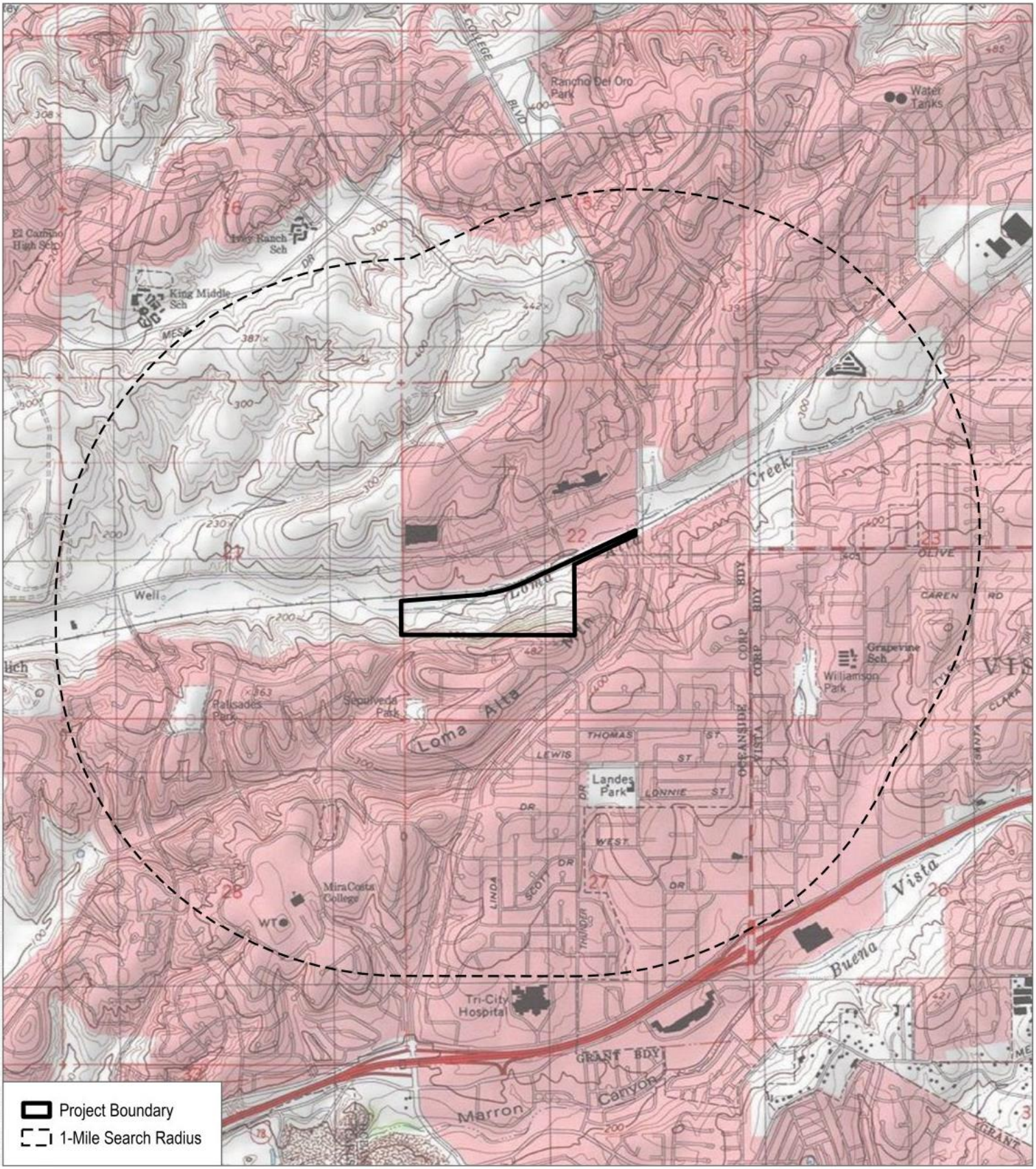

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Trolley Place

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MAIN OFFICE
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ENCINITAS, CALIFORNIA 92024
T 800.450.1818 F 760.632.0164

February 14, 2024 15953

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

Subject: Information Request for the Trolley Place Project, Oceanside, San Diego County, California

Dear Ms. Pinto,

The Trolley Place Project (project) is located south of Oceanside Boulevard and the Sprinter/rail line and west of Olive Drive in the City of Oceanside, San Diego County, California (Figure 1). The project proposes residential development of approximately 300 to 400 units with associated amenities and comprises 5.86-acres. The project falls on Section 22 Township 11 South, Range 4 West in San Luis Rey U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

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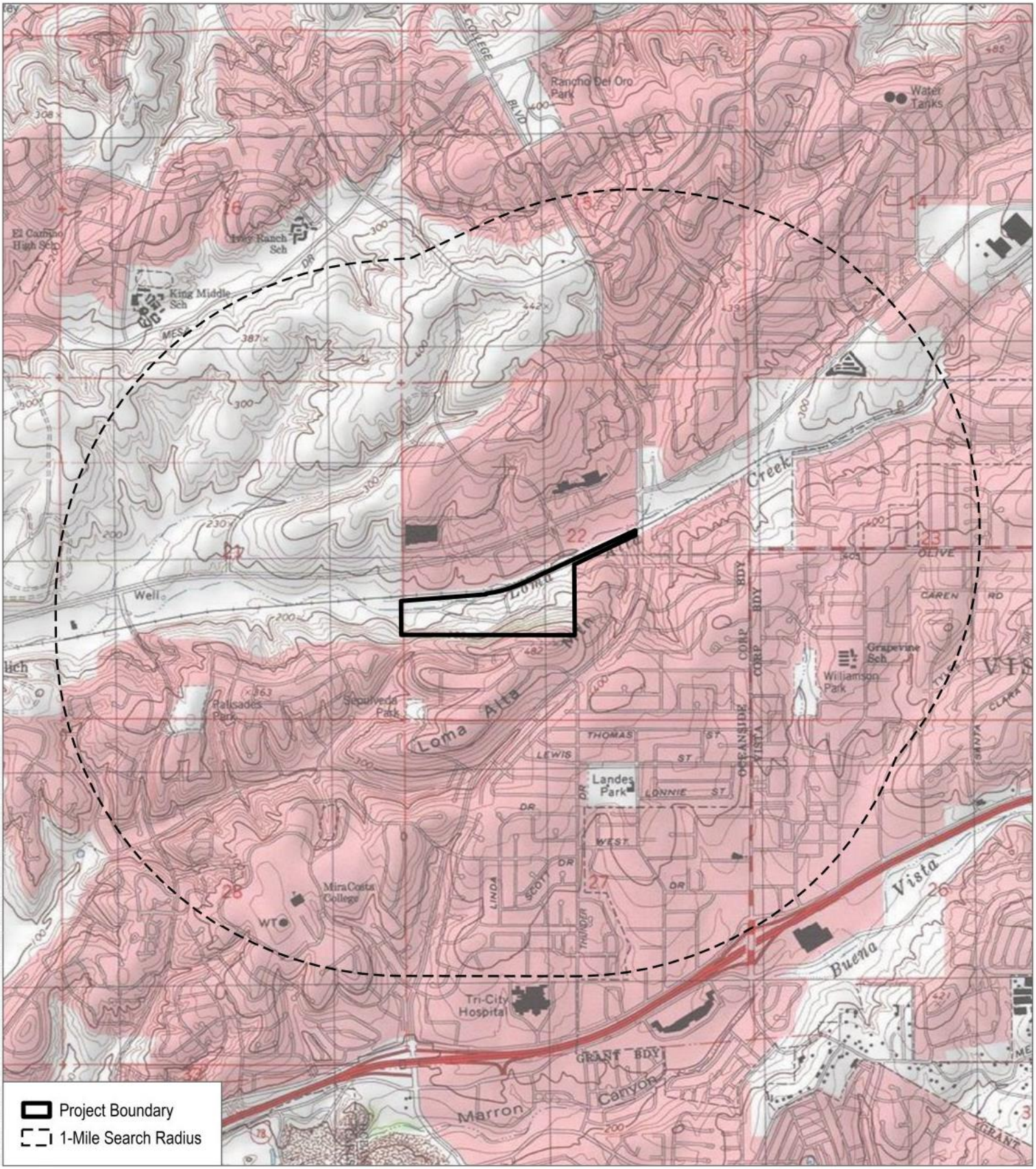

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San Luis Rey Quadrangle - Township 11S Range 4W Section 22

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Trolley Place

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

February 14, 2024 15953

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

Subject: Information Request for the Trolley Place Project, Oceanside, San Diego County, California

Dear Ms. Santos,

The Trolley Place Project (project) is located south of Oceanside Boulevard and the Sprinter/rail line and west of Olive Drive in the City of Oceanside, San Diego County, California (Figure 1). The project proposes residential development of approximately 300 to 400 units with associated amenities and comprises 5.86-acres. The project falls on Section 22 Township 11 South, Range 4 West in San Luis Rey U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

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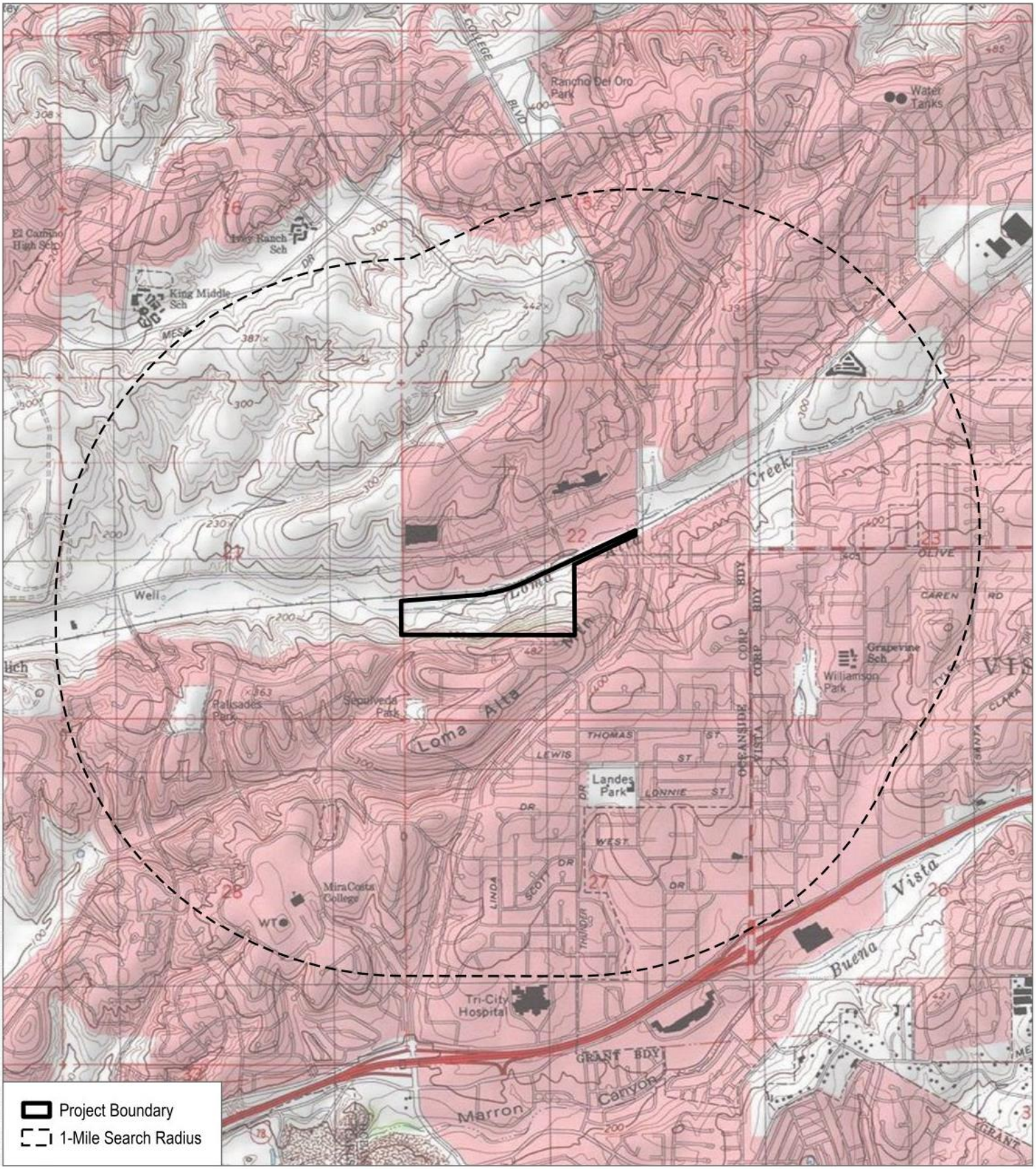

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Trolley Place

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ENCINITAS, CALIFORNIA 92024
T 800.450.1818 F 760.632.0164

February 14, 2024 15953

Mr. Ray Teran, Resource Manager
Viejas Band of Kumeyaay Indians
1 Viejas Grade Rd.
Alpine, CA 91901

Subject: Information Request for the Trolley Place Project, Oceanside, San Diego County, California

Dear Mr. Teran,

The Trolley Place Project (project) is located south of Oceanside Boulevard and the Sprinter/rail line and west of Olive Drive in the City of Oceanside, San Diego County, California (Figure 1). The project proposes residential development of approximately 300 to 400 units with associated amenities and comprises 5.86-acres. The project falls on Section 22 Township 11 South, Range 4 West in San Luis Rey U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

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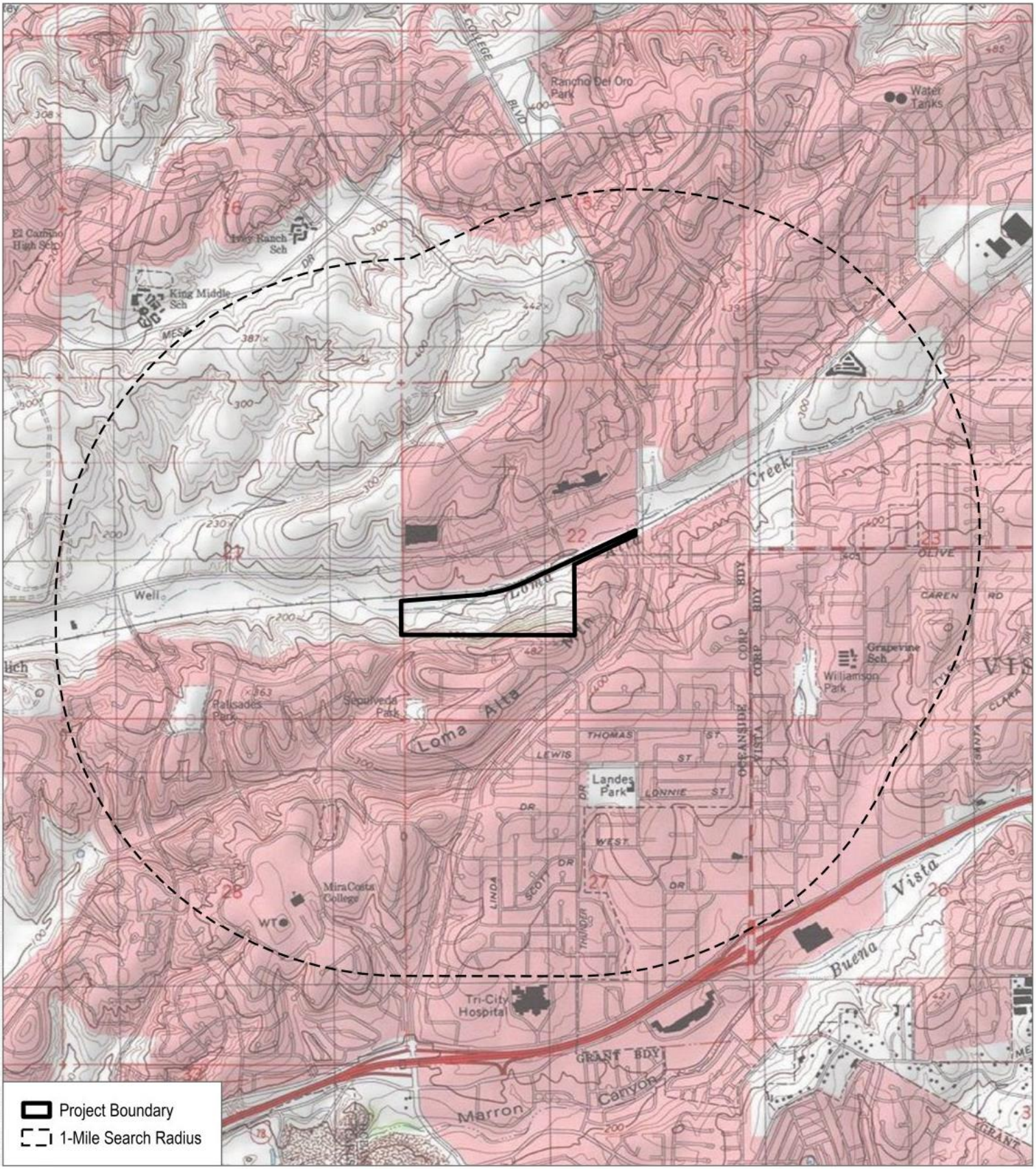

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February 14, 2024 15953

Mr. Isaiah Vivanco, Chairperson
Soboba Band of Luiseno Indians
P.O. Box 487
San Jacinto, CA 92581

Subject: Information Request for the Trolley Place Project, Oceanside, San Diego County, California

Dear Mr. Vivanco,

The Trolley Place Project (project) is located south of Oceanside Boulevard and the Sprinter/rail line and west of Olive Drive in the City of Oceanside, San Diego County, California (Figure 1). The project proposes residential development of approximately 300 to 400 units with associated amenities and comprises 5.86-acres. The project falls on Section 22 Township 11 South, Range 4 West in San Luis Rey U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

As part of the cultural resources study prepared for the proposed project, Dudek contacted the Native American Heritage Commission (NAHC) conducted a Sacred Lands file (SLF) search and a list of Native American individuals and/or tribal organizations who may have knowledge of cultural resources in or near the proposed project area. The NAHC emailed a response on February 13, 2024, which stated that the SLF search identified the presence of Native American cultural resources in the immediate project area.

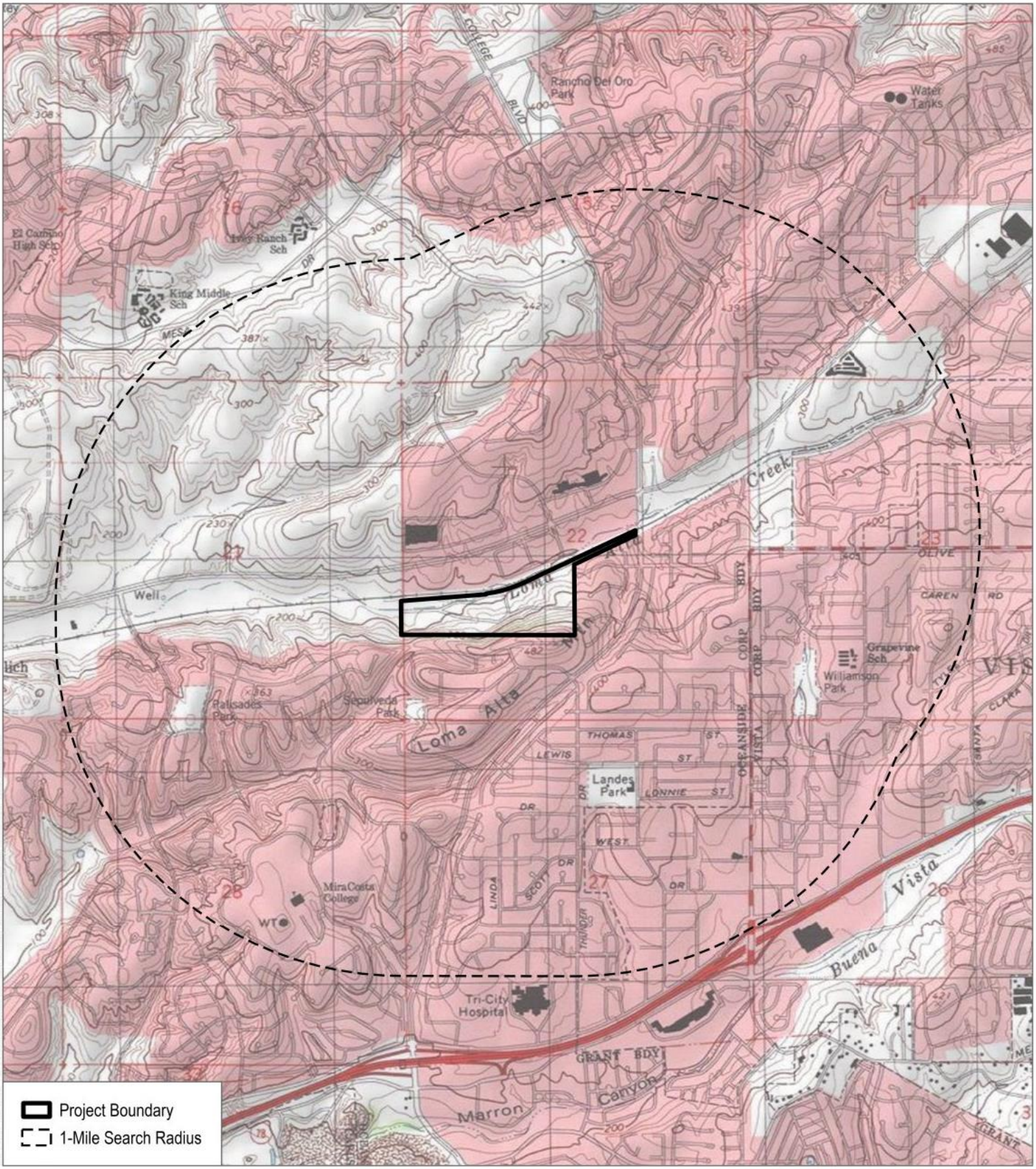
Please note that this letter does not constitute Assembly Bill (AB) 52 notification or initiation of consultation. Tribes that wish to be notified of projects for the purposes of consultation must contact the lead agency, The City of Oceanside (City), in writing (pursuant to Public Resources Code Section 21080.3.1 (b)).

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

Respectfully,

Makayla Murillo, B.A.
Archaeologist
DUDEK
Phone: (760) 846-5874
Email: mmurillo@dudek.com

Attachments: *Figure 1. Records Search Map*



SOURCE: USGS 7.5-Minute Topo Series 1:24,000

San Luis Rey Quadrangle - Township 11S Range 4W Section 22

DUDEK

0 500 1,000 Feet 0 260 520 Meters

Records Search

Trolley Place

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

February 14, 2024 15953

Ms. Alexis Wallick, Assistant THPO
Pala Band of Mission Indians
PMB 50, 35008 Pala Temecula Road
Pala, CA 92059

Subject: Information Request for the Trolley Place Project, Oceanside, San Diego County, California

Dear Ms. Wallick,

The Trolley Place Project (project) is located south of Oceanside Boulevard and the Sprinter/rail line and west of Olive Drive in the City of Oceanside, San Diego County, California (Figure 1). The project proposes residential development of approximately 300 to 400 units with associated amenities and comprises 5.86-acres. The project falls on Section 22 Township 11 South, Range 4 West in San Luis Rey U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

As part of the cultural resources study prepared for the proposed project, Dudek contacted the Native American Heritage Commission (NAHC) conducted a Sacred Lands file (SLF) search and a list of Native American individuals and/or tribal organizations who may have knowledge of cultural resources in or near the proposed project area. The NAHC emailed a response on February 13, 2024, which stated that the SLF search identified the presence of Native American cultural resources in the immediate project area.

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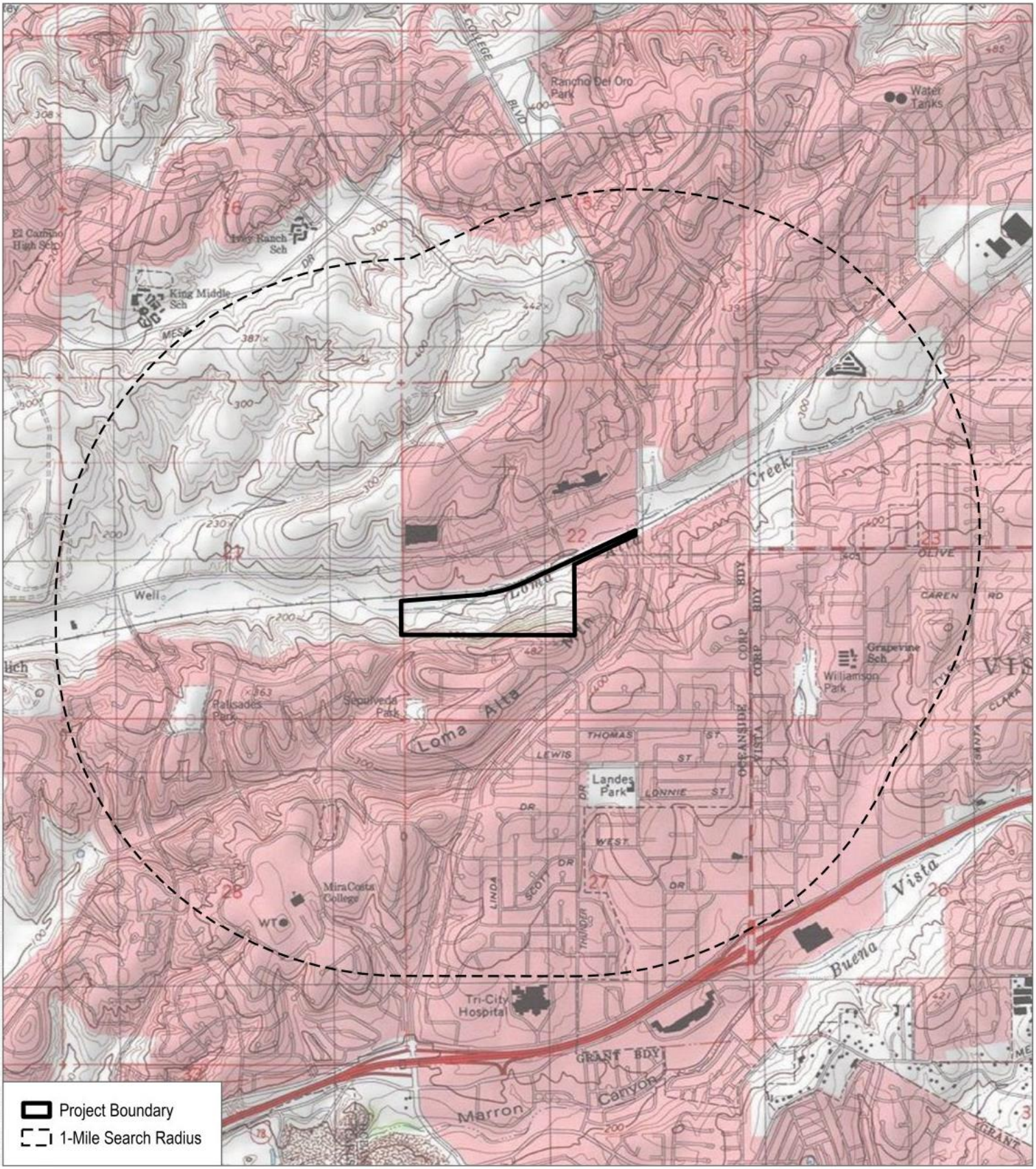

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Trolley Place

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T 800.450.1818 F 760.632.0164

February 14, 2024 15953

Ms. Laurie Gonzalez, Tribal Council/Culture Committee
Rincon Band of Mission Indians
One Governement Center Lane
Valley Center, CA 92082

Subject: Information Request for the Trolley Place Project, Oceanside, San Diego County, California

Dear Ms. Gonzalez,

The Trolley Place Project (project) is located south of Oceanside Boulevard and the Sprinter/rail line and west of Olive Drive in the City of Oceanside, San Diego County, California (Figure 1). The project proposes residential development of approximately 300 to 400 units with associated amenities and comprises 5.86-acres. The project falls on Section 22 Township 11 South, Range 4 West in San Luis Rey U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

As part of the cultural resources study prepared for the proposed project, Dudek contacted the Native American Heritage Commission (NAHC) conducted a Sacred Lands file (SLF) search and a list of Native American individuals and/or tribal organizations who may have knowledge of cultural resources in or near the proposed project area. The NAHC emailed a response on February 13, 2024, which stated that the SLF search identified the presence of Native American cultural resources in the immediate project area.

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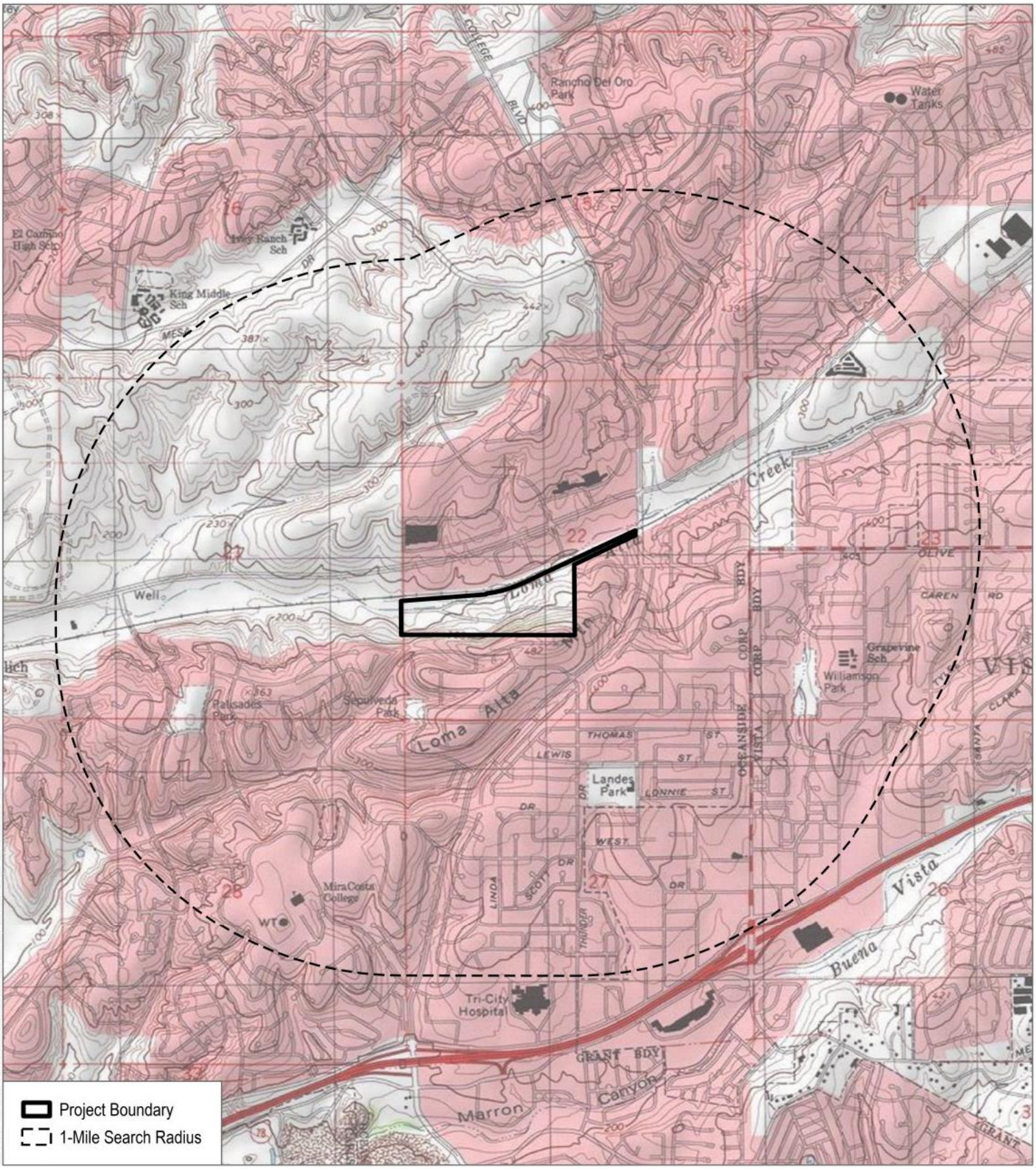

SOURCE: USGS 7.5-Minute Topo Series 1:24,000

San Luis Rey Quadrangle - Township 11S Range 4W Section 22

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Trolley Place

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

February 14, 2024 15953

Mr. Joesph Linton, Council/Culture Committee Member
Rincon Band of Mission Indians
One Governement Center Lane
Valley Center, CA 92082

Subject: Information Request for the Trolley Place Project, Oceanside, San Diego County, California

Dear Mr. Linton,

The Trolley Place Project (project) is located south of Oceanside Boulevard and the Sprinter/rail line and west of Olive Drive in the City of Oceanside, San Diego County, California (Figure 1). The project proposes residential development of approximately 300 to 400 units with associated amenities and comprises 5.86-acres. The project falls on Section 22 Township 11 South, Range 4 West in San Luis Rey U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

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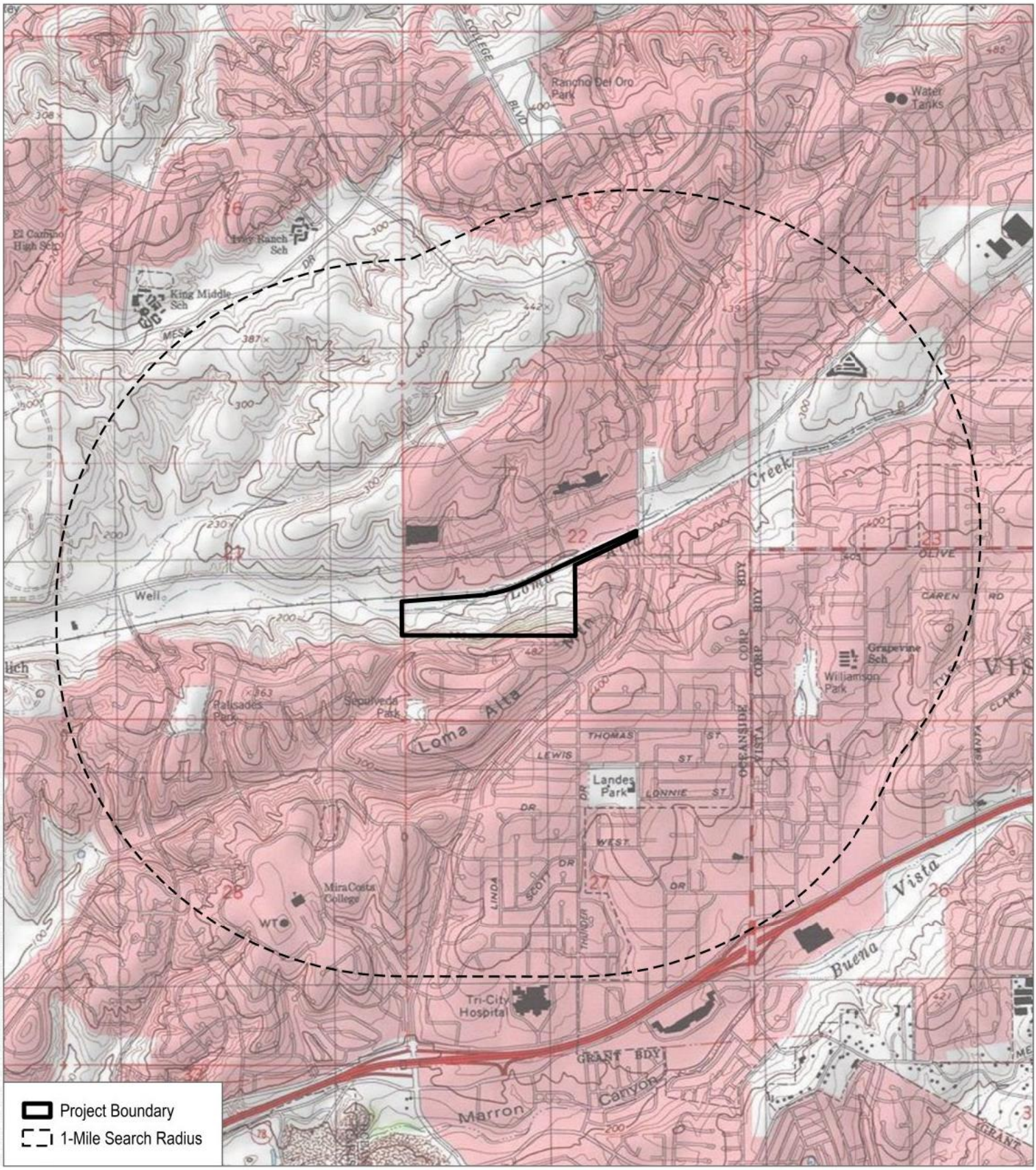

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MAIN OFFICE
605 THIRD STREET
ENCINITAS, CALIFORNIA 92024
T 800.450.1818 F 760.632.0164

February 14, 2024 15953

Ms. Denise Turner Walsh, Attorney General
Rincon Band of Mission Indians
One Governement Center Lane
Valley Center, CA 92082

Subject: Information Request for the Trolley Place Project, Oceanside, San Diego County, California

Dear Ms. Walsh,

The Trolley Place Project (project) is located south of Oceanside Boulevard and the Sprinter/rail line and west of Olive Drive in the City of Oceanside, San Diego County, California (Figure 1). The project proposes residential development of approximately 300 to 400 units with associated amenities and comprises 5.86-acres. The project falls on Section 22 Township 11 South, Range 4 West in San Luis Rey U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

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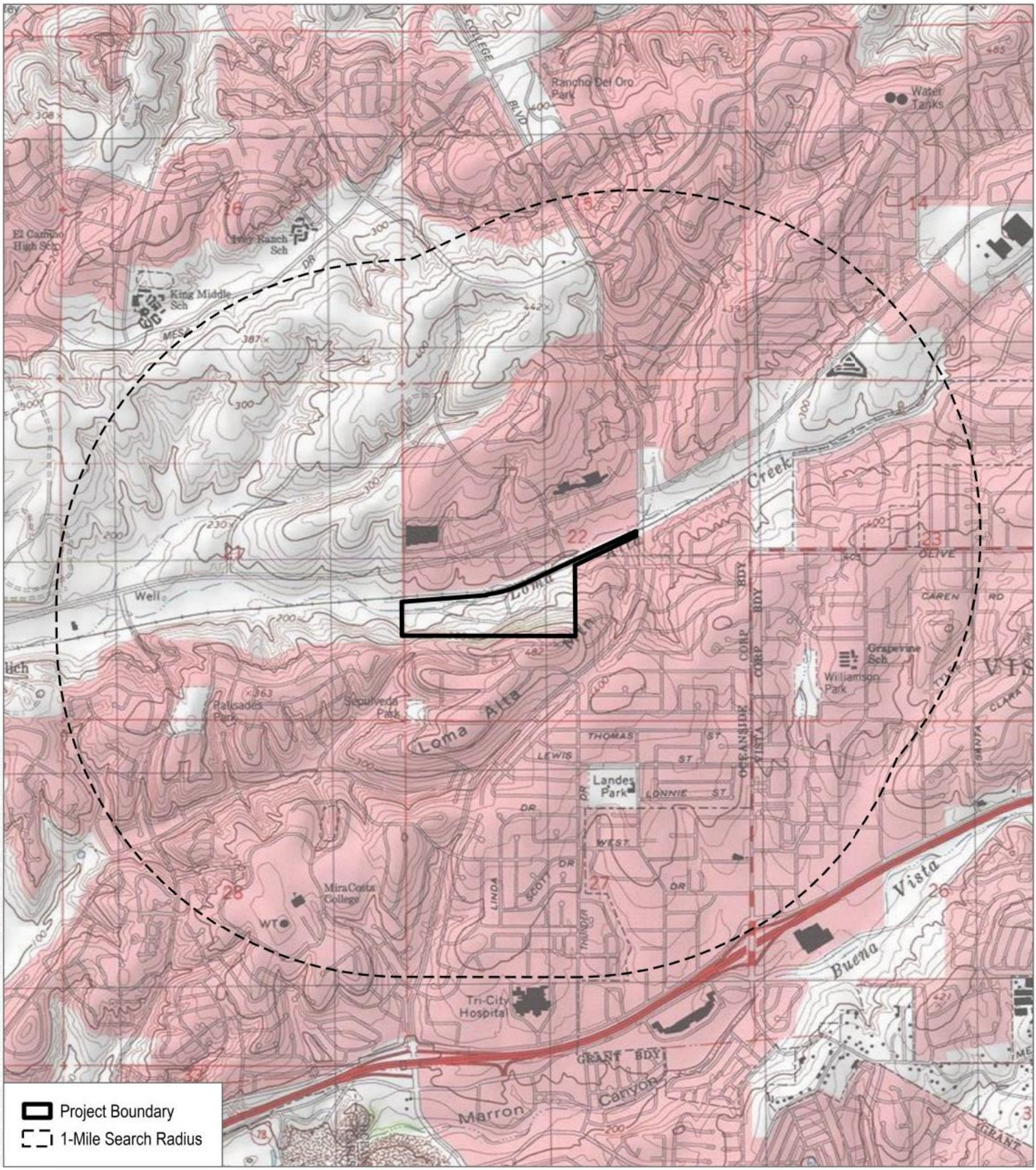

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San Luis Rey Quadrangle - Township 11S Range 4W Section 22

DUDEK

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Records Search

Trolley Place

Rincon Band of Luiseño Indians
CULTURAL RESOURCES DEPARTMENT

One Government Center Lane | Valley Center | CA 92082
(760) 749-1092 | Fax: (760) 749-8901 | rincon-nsn.gov

March 6, 2024

Sent via email: mmurillo@dudek.com

Re: Trolley place Project, City of Oceanside, California

Dear Ms. Murillo,

This letter is written on behalf of the Rincon Band of Luiseño Indians ("Rincon Band" or "Tribe"), a federally recognized Indian tribe and sovereign government. We have received your notification regarding the above referenced project and we thank you for the opportunity to consult on the project. The identified location is within the Traditional Use Area of the Luiseño people and within the Tribe's specific Area of Historic Interest (AHI). As such, the Rincon Band is traditionally and culturally affiliated to the project area.

After review of the provided documents and our internal information, the Rincon Band has specific concerns that the project may impact tangible Tribal Cultural Resources. The project site is culturally sensitive, with many resources and known gathering areas. At this time the Rincon Band would like to consult directly with the lead agency, to review any potential impacts in this project site.

If you have additional questions or concerns, please do not hesitate to contact our office at your convenience at (760) 749 1092 ext. 320 or via electronic mail at slinton@rincon-nsn.gov. Thank you for the opportunity to protect and preserve our cultural assets.

Sincerely,

Shuuluk Linton
Tribal Historic Preservation Coordinator
Cultural Resources Department

Bo Mazzetti, Chairman | Vacant, Vice Chair | Laurie E. Gonzalez, Council Member | John Constantino, Council Member | Joseph Linton, Council Member