

Appendix C

Cultural Resources Study

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January 10, 2025

01705.00006.001

Christina Olson, P.E.
Engineering Services Manager
Vista Irrigation District
1391 Engineer Street
Vista, CA 92081

Subject: Cultural Resources Study for the AB Pipeline Replacement Project

Dear Ms. Olson:

HELIX Environmental Planning, Inc. (HELIX) was contracted to conduct a cultural resources study for the Vista Irrigation District's (District) AB Pipeline Replacement Project, located in the City of Vista (City), in San Diego County, California. HELIX performed background research, including a record search and archival study; contacted the Native American Heritage Commission (NAHC) for a Sacred Lands File search; conducted tribal outreach; and conducted a field survey. Based on our research, the project will not affect historical resources, as defined by the California Environmental Quality Act (CEQA).

PROJECT LOCATION AND DESCRIPTION

The project site is in the City of San Marcos, in northern San Diego County (Figure 1, *Regional Location*). The project site is located west of Interstate 15 and south of State Route 78, within Sections 33 and 34 of Township 11 South, Range 3 West on the San Marcos U.S. Geological Survey (USGS) 7.5-minute topographic quadrangle (Figure 2, *USGS Topography*). The project is located immediately east of Esplendido Avenue and west of Las Posas Road (Figure 3, *Aerial Photograph*). The project proposes to replace the District's existing 14-inch diameter, 1700-ft-long AB pipeline.

The project consists of the replacement of an existing District water pipeline within one of three alternative alignments:

Existing Alignment - replacement of the existing AB pipeline within its current alignment or immediately adjacent within a 20-foot-wide existing District utility easement for the AB pipeline.

SE10 Alternative Alignment - abandon current 1,528-LF AB pipeline and construct a new 1,644-LF pipeline north of the Existing Alignment along the northern boundary of the parcel. The SE10 Alternative Alignment would occur partially within a previously recorded, but not utilized District 20-foot-wide utility easement and partially within the San Diego County Water Authority aqueduct easement.

Road Alternative Alignment - abandon current AB pipeline and construct a new pipeline immediately north and outside of any VID existing utility easements. This alignment would include the recording of a new 20-foot-wide utility easement.

REGULATIONS

The CEQA, Public Resources Code (PRC) 21084.1, and California Code of Regulations (CCR) Title 14 Section 15064.5, address determining the significance of impacts on archaeological and historic resources and discuss significant cultural resources as “historical resources,” which are defined as:

- resource(s) listed or determined eligible by the State Historical Resources Commission for listing in the CRHR (14 CCR Section 15064.5[a][1])
- resource(s) either listed in the National Register of Historic Places (NRHP) or a “local register of historical resources” or identified as significant in a historical resource survey meeting the requirements of Section 5024.1(g) of the PRC, unless “the preponderance of evidence demonstrates that it is not historically or culturally significant” (14 CCR Section 15064.5[a][2])
- resources determined by the Lead Agency to meet the criteria for listing on the CRHR (14 CCR Section 15064.5[a][3])

For listing in the California Register Historical Resources (CRHR), a historical resource must be significant at the local, state, or national level under one or more of the following four criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;
2. It is associated with the lives of persons important to local, California, or national history;
3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values;
4. It has yielded or has the potential to yield information important to the prehistory or history of the local area, California, or the nation.

Under 14 CCR Section 15064.5(a)(4), a resource may also be considered a “historical resource” for CEQA at the discretion of the lead agency.

Significant resources must retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. Resource integrity, which is the authenticity of a historical resource’s physical identity evidenced by the survival of characteristics that existed during the resource’s period of significance, is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association. In an archaeological deposit, integrity is assessed with reference to the preservation of material constituents and their culturally and historically meaningful spatial relationships. A resource must also be judged with reference to the particular CRHR/NRHP criteria under which it is proposed for eligibility.

METHODS

HELIX obtained a record search of the project area and a one-mile radius from the South Coastal Information Center (SCIC) on April 17, 2024. The records search included a review of previously

conducted cultural resources studies and previously recorded cultural resources from the project alignments and search radius. HELIX also referenced an in-house cultural resources assessment report that included the eastern 182 feet of the project alignment (Wilson 2017); this report was not on record at the SCIC.

Various additional archival sources were consulted by HELIX, including historic topographic maps and aerial imagery. These include aerials from 1938, 1947, 1953, 1964, 1978, 1982, 1988, 1993, and 2005 (NETR Online 2024, and several historic USGS topographic maps, including the 1893 Escondido (1:62,500) and the 1948, 1968, 1983, and 1996 San Marcos (1:24,000) topographic maps. The purpose of this research was to identify historic structures and land use in the area, as well as changes in the landscape over time that may have affected archaeological visibility or the integrity of cultural resources.

HELIX contacted the NAHC for a Sacred Lands File search on April 15, 2024. The NAHC responded on May 2, 2024, with a list of tribal representatives. HELIX mailed tribal outreach letters to the recommended representatives on May 31, 2024.

A field survey was conducted by HELIX archaeologist Mary Villalobos and Luiseño Native American Monitor Aleshanee Ventura from Saving Sacred Sites (representing the San Luis Rey Band of Mission Indians) on July 20, 2024. The proposed alignments and a 100-foot buffer were walked in parallel transects spaced five meters apart, where the terrain allowed to identify surface artifacts and features.

RESULTS

Records Search

The records search results indicated a total of 62 cultural resources studies have been completed within one mile of the project area, 13 of which overlap the project area (Table 1, *Previous Studies within One-Half Mile of the Project Area*). The overlapping studies include four cultural resources survey studies, two draft Environmental Impact Reports, two cultural resources reviews and reconnaissance studies, two cultural resources evaluations, one site visit, and one archaeological constraints analysis. Five of these studies included field work. No information was available on one overlapping study. Records search results can be found in Attachment B (confidential, bound separately).

One of the overlapping studies, the AB Line Replacement Project and Meyer's Siphon Replacement Project (Pignuolo 2015), followed the current project alignment. This study consisted of a records search and a field check, both of which were negative for cultural resources. This study recommended that the full AB Pipeline alignment be surveyed for cultural resources before construction, as the "potential for resources in those areas exists" (Pignuolo 2015).

Table 1
PREVIOUS STUDIES WITHIN ONE MILE OF THE PROJECT AREA

Report No. (SD-)	Report Title	Author, Date
SD-00224	Archaeological Survey of the San Marcos General College Community Plan Area San Marcos, California.	Carrico, 1977
SD-00591	Archaeological Resources Survey of the Santalina Hills Property	Cheever, 1988
SD-00692	Archaeological Survey for the Proposed Sycamore Avenue-Robelini Drive Buena Creek Road, Vista, California	Fink, 1973
SD-00696	Archaeological Survey for the Proposed Widening of South Santa Fe Avenue, Vista, California	Fink, 1974
SD-00710	Cultural Resource Significance Testing at SDI-8813 The Palomar Heights Project City of San Marcos, California	Cheever, 1989
SD-01031	Archaeological Report for Business/Industrial, Richmar, Lake San Marcos and Barham/Discovery Community Plan, San Marcos, California	Gallegos, 1983
SD-1046*	Unknown	Unknown
SD-01354	Archaeological Sensitivity Study of the Twin Oaks Valley, San Diego County, California.	San Diego Archaeological Center, 1975
SD-01678*	A Cultural Resource Survey of the Baldwin Park Property	Wade & Hector, 1988
SD-02043*	Draft Environmental Impact Report San Marco Flood Control Channel San Marcos Creek/Las Posas Reach SCH #88061505	Michael Brandman Associates, Inc., 1989
SD-02091*	Draft Environmental Impact Report San Marcos Highlands Specific Plan	ERC, 1990
SD-02399	Cultural Resources Assessment for 6+ Acres in San Marcos, CA	TMI, 1989
SD-02424	Archaeological Survey, Testing, and Evaluation Program for the North County square II Project	Clevenger et al., 1992
SD-02548	Revised Archaeological Survey, Testing, and Evaluation Program for the North County Square II Project, City of Vista, San Diego County, California	Clevenger et al., 1992
SD-02916	Cultural Resources Assessment of AT&T's Proposed San Bernardino to San Diego Fiber Optic Cable, San Bernardino, Riverside and San Diego Counties, California	Peak & Associates, Inc., 1990
SD-03075	Historic Property Survey Report for the State Route 78 Corridor Enhancement Project II-SD-78, P.M. 5.3-9.8, 965100, City of Vista, California	Carrico et al., 1995
SD-03374	A Positive Archaeological Survey Report for the Sycamore Avenue Interchange Project 11-SD-78 PM 8.7/9.8 11221-184970 Vista, California	Glenn, 1993
SD-04108	Cultural Resource Survey of the Palomar Heights Projects, San Marcos, California	Pigniolo, 1990
SD-05342*	Cultural Resources Literature Review and Reconnaissance for the San Marcos Highlands	Brown, 2001
SD-05797	Archaeological Sensitivity Study of the Twin Oaks Valley, San Diego County, CA	SDCAS, 1975
SD-06162	A Positive Archaeological Survey Report for the Sycamore Avenue Interchange Project	Glenn, 1993
SD-07114*	San Marcos Survey Introduction to Archaeological Surveying	McCorkle-Apple, 1976

Report No. (SD-)	Report Title	Author, Date
SD-07274	Historic Property Survey Report for the State Route 78 Corridor Enhancement Project 11-SD-78, P.M. 5.3-9.8, 965100 City of Vista, California	Carrico, 1995
SD-08456	Historic Property Survey Report-Negative Findings First Supplemental	Rosen, 2003
SD-08546	First Supplemental Historic Property Survey Report: South Santa Fe Avenue Reconstruction Project	Dolan, 2003
SD-08769	Archaeological Survey for the Proposed Sycamore Avenue-Robelini Drive Buena Creek Road Vista, California Project IM 1290	Fink, 1973
SD-08865	Historic Property Survey Report South Santa Fe Avenue Improvement Study in Vista and San Marcos, California	Snyder & Rosen, 1999
SD-09546	Cultural Resource Test Report for Oceanside-Escondido Rail Project Oceanside, California	Guerrero et al., 2001
SD-09579	Cultural Resource Survey and Test Report for the San Marcos School District San Marcos, California	Guerrero et al., 2004
SD-09600	Cultural Resources Survey for Smilax Road Extension Project, San Diego County, California	Cook, 2005
SD-09652	Cultural Resource Assessment/Evaluation for Cingular Wireless Site SD613-01, San Diego, California	Kyle, 2001
SD-09808	An Archeological Field Report on Buena Creek Ranch	Polan, 1978
SD-10262	Cultural Resource Records Search and Site Visit Results for Cricket Telecommunications Facility Candidate San-201b (Borden Water Tank), West Bordon Road, San Marcos, San Diego County, California	Bonner & Aislin-Kay, 2006
SD-10432	Cultural Resources Sensitivity Analysis for the Carryover Storage and San Vicente Dam Raise Project (CSP) Alternatives Analysis	Hector, 2006
SD-10551	Cultural Resources Final Report of Monitoring and Findings for the Qwest Network Construction Project, State of California	Arrington, 2006
SD-10622*	Cultural Resources Analysis for T-Mobile Site # Sd06937a: 2141 Esplendido Avenue, Vista, Ca 92083	Losee, 2007
SD-11453	Historic Resource Survey, a Project of the City of Vista, California	Robbins-Wade & Giletti, 2007
SD-11524	A Cultural Resources Evaluation for the Vista and Buena Sanitation District 2007 Sewer Master Plan Update	Rosenberg et al., 2007
SD-11784	Cultural Resources Inventory, Olson Property, Vista, San Diego County, California	Murray & Robbins-Wade, 2005
SD-11873	Cultural Resources Records Search and Site Visit Results For AT&T Wireless Facility Candidate NS-327-01 (Haisha Property), Located at 1992 South Santa Fe Avenue, Vista, San Diego County, California	Bonner et al., 2008
SD-12039	Cultural Resources Monitoring Report for the North County Transit District (NCTD) Sprinter Rail Project Oceanside to Escondido, California	Guerrero & Gallegos, 2007
SD-12162	Negative Cultural Resources Survey Report for Moore Boundary Adjustment	Kwiatkowski, 2009
SD-12418	Results of the Mitigation Monitoring and Data Recovery Program for the San Marcos Unified School District Elementary School #2 Project	Clowery-Moreno & Smith, 2008

Report No. (SD-)	Report Title	Author, Date
SD-12553	Cultural Resources Records Search and Site Visit Results for Verizon Wireless Candidate Palomar College, 1387 West Borden Road, San Marcos, San Diego County, California	Bonner & Williams, 2008
SD-12605*	Cultural Resource Records Search Results and Site Visit for AT&T Mobility, LLC Candidate NS0328 (Spitzfaden Residence), 2141 Esplendido Avenue, Vista, San Diego County, California	Bonner & Williams, 2009
SD-12655	Historic and Archaeological Resources Survey, Vista Flume Study, Vista, San Marcos, and Escondido San Diego County, California	Robbins-Wade et al., 2009
SD-13314*	AT&T Site NS0328 Sptizfaden LTE Optimal 2141 Esplendido Avenue Vista, San Diego County, California 92084	Loftus, 2011
SD-14140*	Archaeological Records Search and Literature Review, Vallecitos Water District Master Plan Update San Diego County, California	Robbins-Wade, 2003
SD-15461*	Archaeological Constraints Analysis for the AB Line Replacement Project and Meyer's Siphon Replacement Project, Vista, California	Pigniolo, 2015
SD-15740	Cultural Resource Records Search and Site Visit Results for Verizon Wireless Candidate 'Smilax', 2638 South Santa Fe Avenue, San Marcos, San Diego County, California. EBI Project No. 61140935	Williams & Wills, 2015
SD-15794	Cultural Resource Assessment Class Iii Inventory, Verizon Wireless Services, Blue Bird Canyon Facility, City of Vista, County of San Diego, California	Fulton & Tibbet, 2014
SD-16048	Cultural Resources Survey Palomar College - Light Standard B / Ensite #17334 (182412) 1387 West Borden Road San Marcos, San Diego County, California 92069 Ne1/4 Sw1/4 S3 T 12s R3w	Perez, 2014
SD-16439	Cultural Resource Survey and Rock Feature Test Program for Sugarbush Residential Project County of San Diego, California GPA 05-010/TM 5295rp17/SD 02-055/R04-008/SP 03-003/S04-015/Log No. 02-08-047	Kyle, 2009
SD-17165*	Cultural Resources Survey Letter Report for the Pipeline 4 Portion of the Construction Monitoring for the Pipeline 3 Desalination Relining and Pipeline 4 Vert Modifications Project	Comeau, 2013
SD-17185*	Cultural Resources Study for the Murai Subdivision Environmental Impact Report Project, San Marcos, San Diego County, California	Castells, 2017
SD-17753	Phase I Investigation for the Wilson Prop. (17a) - Collocation Tower Project, Vista, San Diego County, California	Noble, 2018
SD-17811	Negative Cultural Resources Survey Report for the Lone Oak Lane Project, San Diego County, California Pds2016-Tpm-21244	Pham & Hale, 2017
SD-17813	Historic-Period Building Evaluation 425 Smilax Road Assessor's Parcel Number 217-191-02 San Marcos-Vista Area, San Diego County, California	Tang & Jacquemain, 2019
SD-18211	Cultural Resources Sue Diligence Study for the Smilax Project, Unincorporated San Diego County, California	Campbell-King & Power, 2018
SD-19591	Cultural Resources Memorandum for the Proposed Smilax-Mimosa Sewer Improvements Project, County of San Diego, California	Samudio-Gurrola & Abdo, 2022
SD-19944	Cultural Resources Survey for the Santa Fe Flores Project, San Marcos, California	Yerka & Zepeda-Herman, 2022

*within the project area

The records search results also indicated that 18 cultural resources have been previously recorded within the one-mile radius surrounding the project alignment, none of which had been recorded within the project area (Table 2, *Cultural Resources Recorded within One Mile of the Project Area*). As illustrated in the table below, these include 15 historic resources consisting of five single-family residences around Mission Road to the west, five industrial or commercial buildings, one property housing both a single-family residence and an industrial building, two earthen dams, the Vista Irrigation District Bench Flumes, and Old Highway 395. Prehistoric resources consist of one bedrock milling slick and one isolated lithic flake. The remaining resource within the search radius is unknown because the SCIC does not have the record on file.

Table 2
CULTURAL RESOURCES RECORDED WITHIN ONE MILE OF THE PROJECT AREA

Resource Number (P-37-)	Resource Number (CA-SDI-)	Age and Resources Present	Description	Recorder, Date
000817	817	Prehistoric feature	Bedrock Milling Feature – one slick	True, 1961
003357	3357	unknown	Unknown – not on file at the SCIC	Unknown
18186	N/A	Historic building	Single-family residence	P.S. Preservation Services, 1999
18187	N/A	Historic building	Commercial building	P.S. Preservation Services, 1999
18188	N/A	Historic building	Commercial building	P.S. Preservation Services, 1999
18189	N/A	Historic building	Industrial building	P.S. Preservation Services, 1999
18192	N/A	Historic building	Industrial building and single-family property	P.S. Preservation Services, 1999
18198	N/A	Historic building	Commercial building	P.S. Preservation Services, 1999
18199	N/A	Historic building	Commercial building	P.S. Preservation Services, 1999
18200	N/A	Historic building	Single-family residence	P.S. Preservation Services, 1999
18201	N/A	Historic building	Single-family residence	P.S. Preservation Services, 1999
18202	N/A	Historic building	Single-family residence	P.S. Preservation Services, 1999

Resource Number (P-37-)	Resource Number (CA-SDI-)	Age and Resources Present	Description	Recorder, Date
18203	N/A	Historic building	Single-family residence	P.S. Preservation Services, 1999
30889	N/A	Historic feature	Vista Irrigation District Bench Flumes	Piek & DeCarlo, 2015; Van Wormer, 2009
033557	N/A	Historic road	Old Highway 395	ASM Affiliates, 2021; Stringer-Bowsher, 2018; Foglia & Keckeisen, 2017; Chasteene, 2017; ASM Affiliates, 2015; Tift, 2013
036868	N/A	Historic structure	Earthen dam	Piek, 2016
036869	N/A	Historic structure	Earthen dam	Piek, 2016
036870	N/A	Prehistoric isolate	Lithic flake	Piek, 2016

San Marcos Highlands Project

In 2017, HELIX conducted a cultural resources due diligence assessment for the San Marcos Highlands Project (Wilson 2017), which is located directly east of the County of San Diego and City of San Marcos-owned parcels. The eastern 182 feet of the current project alignments enters into this study area. This study included a records search at the SCIC, a Sacred Lands File search, a review of previous environmental studies, and a site visit. The study relied upon the field survey results from a previous technical study (Castells and Stringer-Bowsher 2014) to supplement the site visit results. Neither study identified cultural resources within the current project alignment; however, both noted dense vegetation that obscured ground visibility and potentially unknown cultural resources (Wilson 2017 and Castells and Stringer-Bowsher 2014).

Other Archival Research

The earliest available topographic map – the 1893 Escondido (1:62,500) USGS map – depicts the area containing the project as an undeveloped, hilly region with the Southern California Railroad located to the south of the project. While few structures are located within the general area, the townships of Twin Oaks, Buena, and San Marcos are recorded on the map to the east, west, and south of the project, respectively. The 1948 San Marcos (1:24,000) map shows these townships in greater detail and includes references to State Route (SR-) 78 to the south and several trails within and surrounding the project site. These trails are visible on the 1968 San Marcos map as light-use roads, including one that appears to be in alignment with the modern Las Posas Road. Esplendido Avenue is shown as a paved road with a cul-

de-sac at its northern terminus, just north of the SE10 Alternative Alignment. Two structures are indicated around the cul-de-sac. An aqueduct service road is also shown running south of Blue Bird Canyon Road. Both subsequent maps – the 1983 and 1996 San Marcos maps – show the development of the area surrounding the project. New neighborhoods are mapped to the west and the southeast of the project site, and new structures are visible to the northeast. A total of five structures (residences) are shown around the Esplendido Avenue cul-de-sac by 1983, and by 1996 the two dirt driveways currently leading north and south of the cul-de-sac are present. The southern of these terminates at a house that forms the northern perimeter of the SE10 Alternative Alignment. No structures were mapped within the project alignments in any of the topographic maps.

The earliest aerial photograph of the region, from 1938, shows the area containing the project as consisting of undeveloped hills (NETR Online 2024). A few trails are present nearby, and the fledgling community of Buena is visible to the west. The 1949 aerial photograph shows Esplendido Avenue as a widened dirt road, and what appears to be a smaller dirt trail or road following the existing alignment. In the 1953 aerial photograph, Esplendido Avenue appears to have been paved and extended into the northern cul-de-sac; a second road or trail is present along the SE10 Alternative Alignment. This latter road follows the boundary line between publicly owned land to the south and the private properties to the north. In the 1964 and 1967 aerials, clearing is evident north and east of the project, one portion of which touches the northwestern end of the SE10 Alternative Alignment. The entire SE10 Alternative Alignment and the northern quarter of the Existing and Road Alignment Alternatives appear to have been cleared by the 1981 aerial photograph. By the time the 1993 aerial photograph was taken, the majority of the houses in the area had been built, and a large swath of land to the east of the project had been graded, likely for the access road visible in the 2005 aerial photograph (NETR Online 2024).

Sacred Lands File Search

The NAHC was contacted in April 2024 for a Sacred Lands File search. They responded on May 2, 2024, with negative results. HELIX contacted the recommended representatives on May 31, 2024. To date, two responses have been received, one from the San Pasqual Band of Mission Indians (San Pasqual) and one from the Rincon Band of Luiseño Indians (Rincon). Native American Correspondence is located in Attachment C (confidential, bound separately).

Angelina Gutierrez from San Pasqual responded on June 26, 2024, stating that the project area is within their Traditional Use Area (TUA) and requesting Assembly Bill (AB) 52 government-to-government consultation, if applicable. Ms. Gutierrez also requested to review any cultural resource reports generated for this project and offered to provide Native American monitoring for the project.

Shuuluk Linton from Rincon responded on June 19, 2024, stating that this project is within their TUA and their specific Area of Historic Interest, and that the project area is in the vicinity of a “place name...associated with the Luiseño people”. Mr. Linton expressed specific concerns about potential project impacts and requested that a Rincon monitor be present at the cultural resources survey for this study. He also requested direct government-to-government consultation.

By the time Rincon’s response letter was received on June 19, 2024, the cultural resources survey had already been completed with a Native American monitor from Saving Sacred Sites. To accommodate Rincon’s request, HELIX Cultural Resources Project Manager, Nikki Falvey, and Staff Archaeologist, Mary

Villalobos, met with Rincon's Tribal Historic Preservation Officer, Cheryl Madrigal, at the project area on July 17, 2024 to conduct a site visit. The results of both visits are detailed below.

Field Survey

HELIX archaeologist Mary Villalobos and Luiseño Native American monitor Aleshanee Ventura from Saving Sacred Sites surveyed the project site on July 20, 2024. Two cultural resource sites were identified, both of which are shell scatters consisting of several whole and many partial oyster and clam shells. The scatters (ABP-S-001 and ABP-S-002) were located along the SE10 Alignment Alternative at the base of the private properties located upslope to the north. The context of the sites suggests that the shell and associated soil originated on the northern residential property and were pushed to their current location during housing development.

During the site visit with Rincon on July 17, 2024, Ms. Madrigal, Ms. Falvey, and Ms. Villalobos examined the shell scatters and walked the project alignments. Ms. Madrigal agreed that the scatters have been displaced from their primary context and recommended archaeological and Native American monitoring during ground-disturbing construction work but no archaeological testing.

The shell scatters (ABP-S-001 and ABP-S-002) were recorded on State Department of Parks and Recreation (DPR) 523 forms, which will be submitted to the District and the South Coastal Information Center. These are located in Attachment D (confidential, bound separately).

CONCLUSIONS AND RECOMMENDATIONS

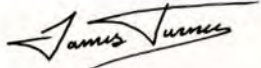
A review of the records search results indicated that no cultural resources have been previously recorded within the project area, and 2014 (Castells and Stringer-Bowsher), 2015 (Pignuolo), and 2017 (Wilson) field studies of the alignments failed to identify any cultural resources. In addition, the Sacred Lands File search provided by the NAHC was negative for the presence of Sacred Lands within the project vicinity. However, San Pasqual and Rincon both stated that the project area is culturally sensitive and requested government-to-government consultation, if applicable. Furthermore, the cultural resources survey identified two shell scatters within the SE10 Alternative Alignment. Since these were in a secondary context and, therefore, lack integrity, they do not constitute significant historical resources. Therefore, none of the project alignment alternatives would impact known historical resources. However, the presence of cultural resources further indicates the cultural sensitivity of the project area, and an archaeological and Native American monitoring program is recommended.

Archaeological and Native American monitoring is recommended for all alignment alternatives for initial ground-disturbing construction activities, including brushing/grubbing, initial grading, and utility trenching, in soil with potential for cultural materials (e.g., not modern fill or formational soils). This monitoring program would include an archaeologist and Luiseño Native American monitor to attend a pre-construction meeting and to be present during initial ground-disturbing activities. The archaeological and Native American monitors would both have the authority to temporarily halt or redirect grading, trenching, or other ground-disturbing activities in the event of a cultural resource discovery. If any significant cultural resources are identified during monitoring, the archaeological Principal Investigator, representatives from the Monitoring Tribe, and District staff would develop and implement appropriate avoidance, treatment, or mitigation measures for these resources.

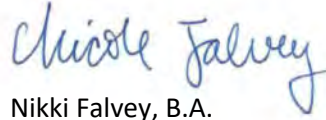
Letter to Ms. Christina Olson
January 10, 2025

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If you have any questions, please contact Nikki Falvey at NikkiF@helixepi.com or at (619) 462-1515 extension 240.



James Turner, M.A., RPA
Senior Archaeologist



Nikki Falvey, B.A.
Cultural Resources Project Manager

Attachments:

- A: Figures
- B: Records Search Results (Confidential, bound separately)
- C: Native American Correspondence (Confidential, bound separately)
- D: DPR Site Forms (Confidential, bound separately)

REFERENCES

Castells, Shelby and Sarah Stringer-Bowsher

- 2014 *Cultural Resources Study for the San Marcos Highlands Project, San Marcos, San Diego County, California*. Prepared by ASM Affiliates. Prepared for Sophia Mitchell & Associates, LLC. Submitted to City of San Marcos, California. Report on file at HELIX Environmental Planning, La Mesa.

NETR Online

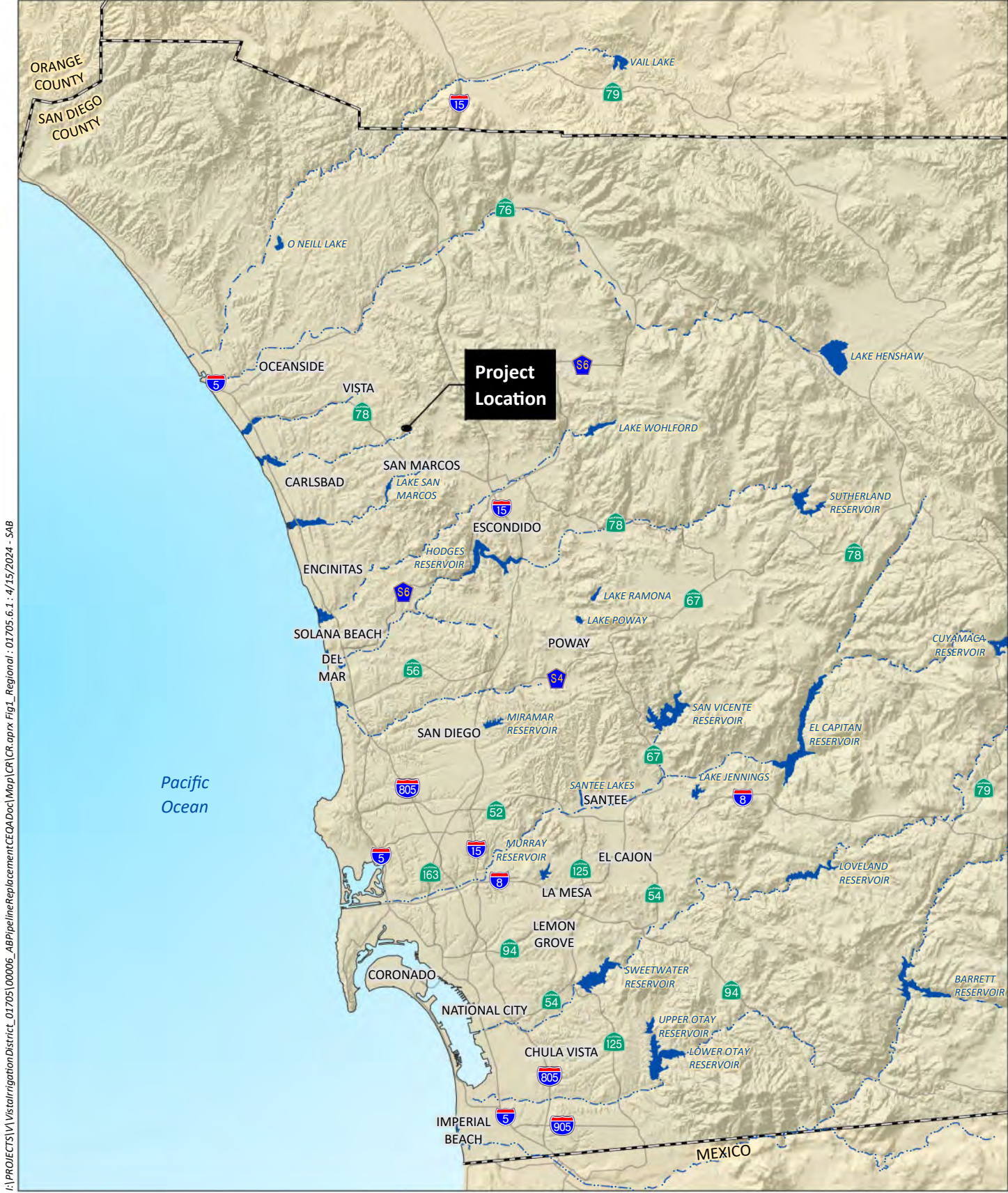
- 2024 Historic Aerials. Nationwide Environmental Title Research, LLC. Electronic document available at: <http://www.historicaerials.com>, accessed April 16, 2024.

Pigniolo, Andrew

- 2015 *Archaeological Constraints Analysis for the AB Line Replacement Project and Meyer's Siphon Replacement Project, Vista, California*. Prepared by Laguna Mountain Environmental for Infrastructure Engineering Corporation. Report on file at the South Coastal Information Center, San Diego State University.

Wilson, Stacie

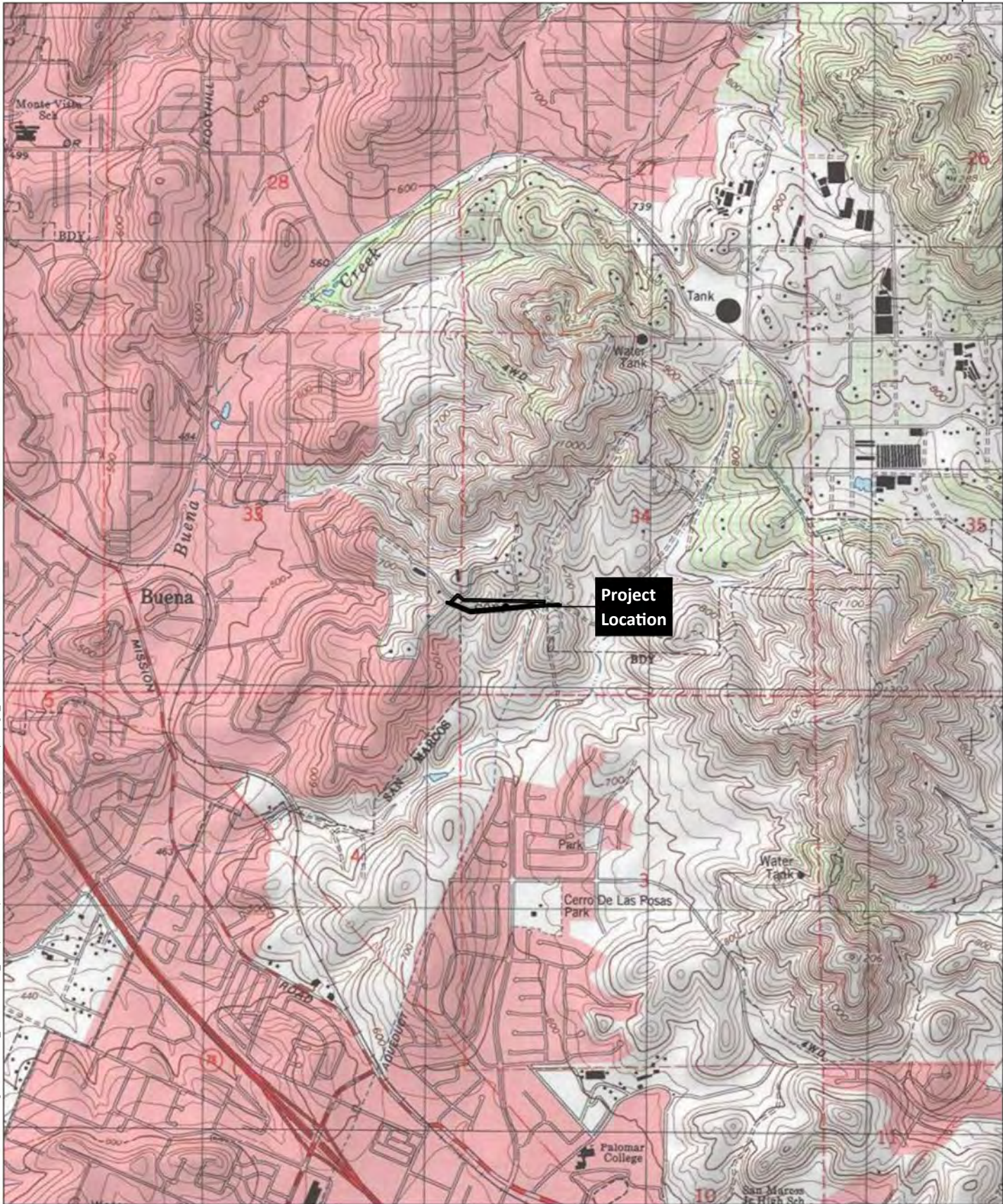
- 2017 *San Marcos Highlands Project Cultural Resources Due Diligence Assessment*. Prepared by HELIX Environmental Planning, Inc. for KB Home. Report of file at HELIX Environmental Planning, La Mesa.



I:\PROJECTS\1\ Vista Irrigation District_01705\00006_AB Pipeline Replacement CEQA Doc\Map\CR\CR aprx Fig1_Regional : 01705.6.1 : 4/15/2024 - SAB

Source: Base Map Layers (SanGIS, 2016)

I:\PROJECTS\1\ Vistalrigation District_01705\00006_AB Pipeline\Replacement CEQA\Doc\Map\CR\CR aprx Fig2_USGS_01705 6.1 : 12/20/2024 - SAB



Source: SAN MARCOS 7.5' Quad (USGS)

