APPENDIX F
PROGRAMMATIC CULTURAL AND PALEONTOLOGICAL RESOURCES ASSESSMENT

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Programmatic Cultural and Paleontological Resources Assessment

City of Del Mar Capital Improvement Program Streamlining Project

Del Mar, California

December 2025

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MANAGEMENT SUMMARY

This technical report presents the results of a program-level assessment of archaeological, tribal cultural, historical architectural (built environment), and paleontological resources for the proposed City of Del Mar (City) Capital Improvement Program (CIP) Streamlining Project (project). The study was conducted to support compliance with the California Environmental Quality Act (CEQA), the City's CEQA Supplemental Regulations, and where applicable federal and state historic preservation laws. The assessment is programmatic in nature, providing a framework for evaluating and mitigating potential impacts to cultural and paleontological resources across a 10-year planning horizon for a diverse suite of infrastructure projects. The study included comprehensive literature and records searches, GIS-based sensitivity modeling, and regulatory review. No new field survey was conducted.

The report was prepared between May and October 2025. Key data collection activities included a South Coastal Information Center (SCIC) records search, a Sacred Lands File search by the Native American Heritage Commission, and a paleontological records search by the San Diego Natural History Museum.

The City's CIP encompasses approximately 2.2 square miles (1,408 acres) in San Diego County, including urbanized corridors, coastal bluffs, lagoon margins, and open space. Most CIP projects are located within the previously disturbed public rights-of-way, but some may extend into areas of moderate to high archaeological and paleontological sensitivity, especially near the San Dieguito River, lagoon, and coastal bluffs.

The SCIC records search identified 67 previous cultural resource studies and 37 recorded cultural resources within the project area, including prehistoric archaeological sites, historic-period archaeological sites, and built environment resources. Several resources are considered significant at the local or state level, while many have been evaluated as not eligible for the National Register of Historic Places or California Register of Historical Resources. The Sacred Lands File search was negative, but the City has initiated Assembly Bill (AB) 52 and Senate Bill (SB) 18 consultation with local tribes. No tribal cultural resources have been formally identified to date, but the area is recognized as sensitive by Kumeyaay tribal representatives. The paleontological records search documented two fossil localities within the City and over 600 additional localities within 5 miles, primarily from the Eocene Delmar Formation, Torrey Sandstone, and Pleistocene Bay Point and Lindavista Formations. These units are considered to have high paleontological sensitivity.

GIS-based models identified high archaeological sensitivity along the San Dieguito River and Lagoon margins, coastal bluffs, and undeveloped open space, and high paleontological sensitivity in areas underlain by fossil-bearing geologic units. Most urbanized areas have low sensitivity due to prior disturbance.

Most CIP projects are located in previously disturbed areas, limiting the potential for impacts to intact resources. However, projects near the lagoon, river, or coastal bluffs, or in open space may encounter significant archaeological or paleontological resources. Direct impacts could include ground disturbance, destruction, or alteration of sites or fossils. Indirect impacts may include increased erosion or exposure of sensitive areas.

This programmatic assessment did not include new field surveys due to the broad scope and early planning stage of the CIP. The analysis relied on existing records, GIS modeling, and prior studies. Site-specific investigations will be required for individual projects in sensitive areas.

This report recommends a tiered mitigation strategy that aligns with CEQA requirements and established best practices. The preferred approach is to avoid and preserve known significant resources in place whenever possible. In areas identified as having moderate to high archaeological or paleontological sensitivity, monitoring should be conducted during any ground-disturbing activities. If avoidance is not feasible and resources are discovered, data recovery excavations should be implemented. The strategy also calls for ongoing tribal consultation and monitoring in culturally sensitive locations. For areas assessed as having low sensitivity, standard discovery protocols are considered sufficient. Additionally, worker training and public education initiatives are suggested, as appropriate, to support resource protection efforts.

This report and supporting documentation will be filed with the City, the SCIC, and other relevant agencies. Confidential site location information will be restricted in accordance with state and federal law.

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1.0 INTRODUCTION

The City of Del Mar (City) is undertaking a comprehensive Programmatic Environmental Impact Report (PEIR) to evaluate the potential environmental effects associated with implementation of its Capital Improvement Program (CIP) Streamlining Project (project). The CIP encompasses a range of infrastructure and facility projects designed to maintain and enhance the City's public services, utilities, and community assets. The purpose of this technical report is to provide a program-level overview of archaeological, tribal cultural, historical architecture, and paleontological resources that could be affected by implementation of the proposed project. This technical report also identifies steps to avoid, minimize, and reduce potential impacts to sensitive resources.

1.1 Background and Purpose

The City's CIP is a strategic planning and budgeting tool for addressing the City's current and future capital infrastructure and facility needs and is revised over time in noticed public meetings of the City Council in consideration of City Council goals and priorities and funding availability. The CIP outlines plans for capital projects, major maintenance, refurbishments, and substantial equipment purchases. Every year, the City undertakes multiple CIP projects involving work on City properties, within City rights-of-way, and within public easements. The project components analyzed in this report include the typical construction and operation protocols for various types of individual CIP projects. The CIP projects covered under this report have been divided into seven categories: undergrounding program, water infrastructure, wastewater infrastructure, storm water infrastructure, street improvements, facilities, and open space. Most CIP projects are located within developed or highly disturbed areas, such as public rights-of-way, and are not anticipated to occur within previously undeveloped open space areas.

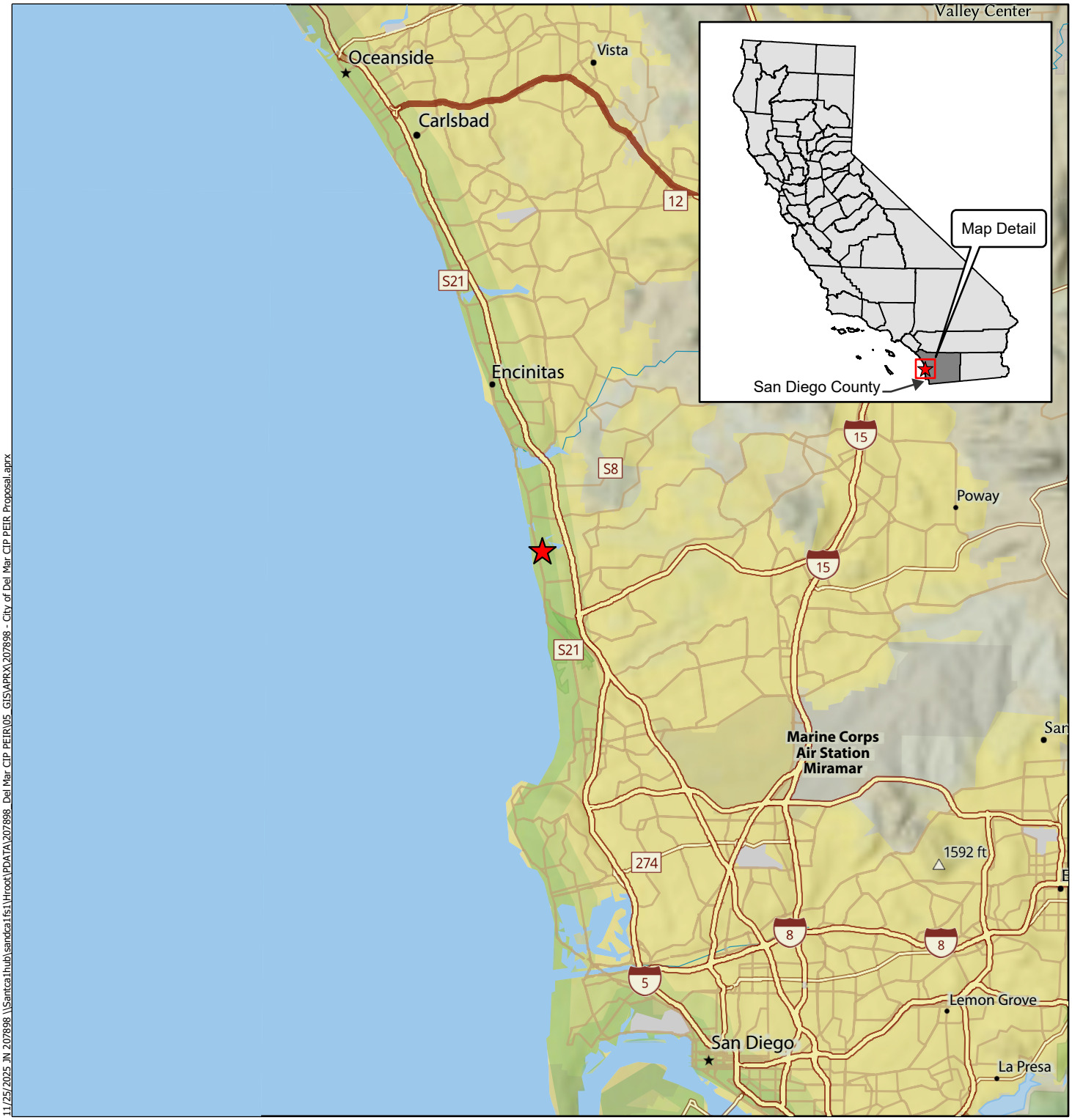
The purpose of this programmatic cultural and paleontological resources assessment is to support the PEIR by summarizing the existing conditions of archaeological, tribal cultural, historical architecture, and paleontological resources within the City, with a focus on significant resources, as defined by California Environmental Quality Act (CEQA). The report synthesizes existing data, literature, and the results of desktop analyses to identify cultural and paleontological constraints and inform the development of mitigation strategies in the PEIR. These strategies are intended to streamline future environmental review and permitting for individual CIP projects, ensuring compliance with the California Environmental Quality Act (CEQA) and other applicable regulations, while protecting the City's significant cultural and paleontological resources.

1.2 Scope of Analysis and Methods

1.2.1 Project Location

Implementation of the CIP would occur within the majority of the City of Del Mar in northwestern San Diego County, California (**Figure 1**). The project site is mapped within Sections 2, 11, 13, 14, and 23, Township 14 South, Range 4 West, of the US Geological Survey (USGS) Del Mar, California, 7.5-minute topographic quadrangle map (**Figure 2**). The City is a coastal community situated along the Pacific Ocean, approximately 20 miles north of downtown San Diego. The project site encompasses approximately 2.2 square miles (1,408 acres) and is bordered by the cities of Solana Beach to the north and San Diego to the south and east, with the Pacific Ocean forming its western boundary (**Figure 3**). The project site is

characterized by a mix of developed urban land uses, including residential neighborhoods, commercial districts, public facilities, parks, and transportation corridors. Notable features within the City include the Del Mar Fairgrounds, Powerhouse Park, Seagrove Park, and segments of the San Dieguito River and Lagoon, which provide important ecological and recreational resources.



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★ Project Location

CITY OF DEL MAR CIP STREAMLINING PROJECT
PROGRAMMATIC CULTURAL & PALEONTOLOGICAL RESOURCES ASSESSMENT

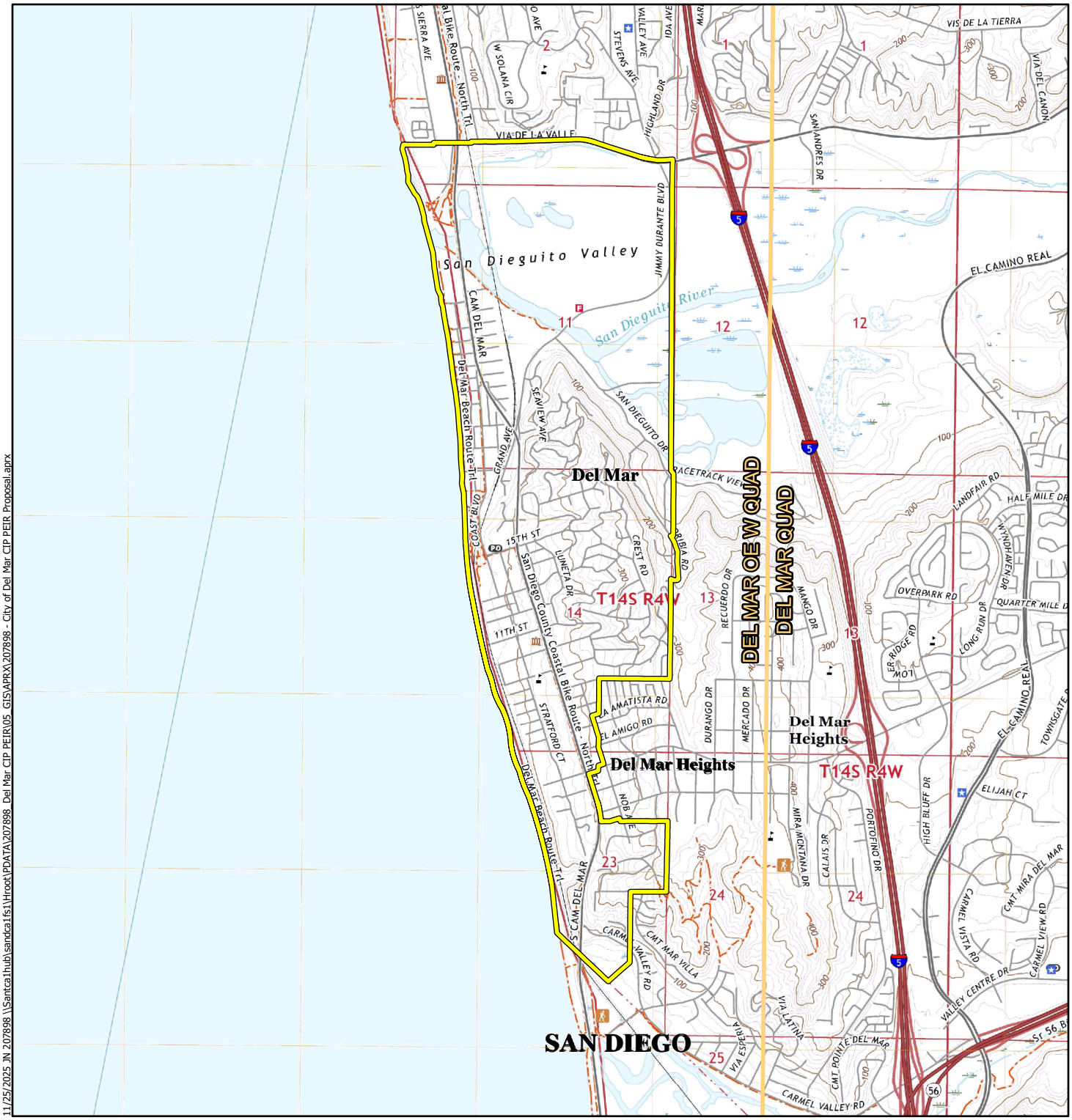
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0 2.5 5 Miles

Source: Esri, ArcGIS Online, USGS, San Diego County

Regional Vicinity

Figure 1



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Project Site

CITY OF DEL MAR CIP STREAMLINING PROJECT
PROGRAMMATIC CULTURAL & PALEONTOLOGICAL RESOURCES ASSESSMENT

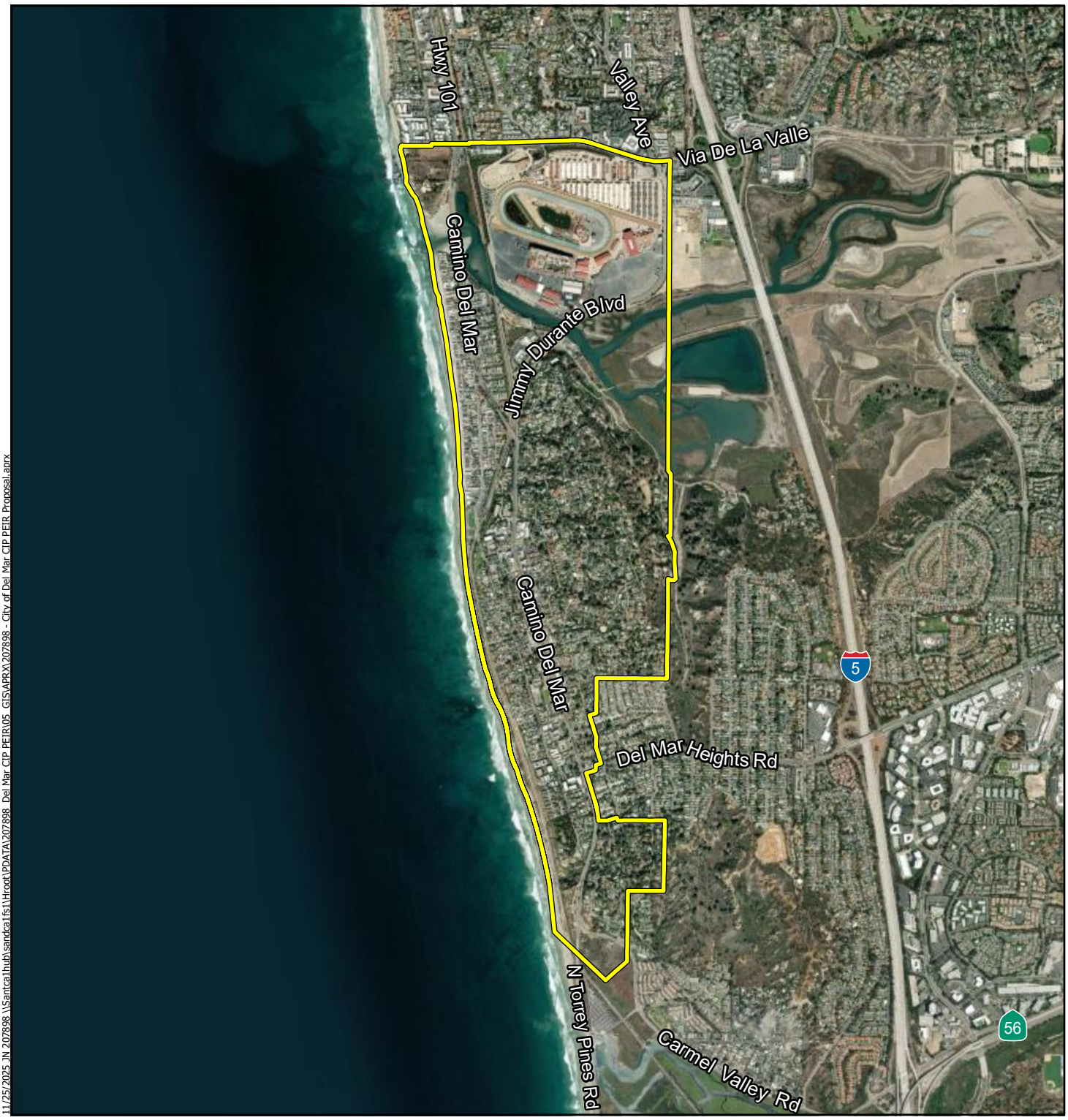
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0 0.25 0.5 Miles

Project Location

Source: California Coastal Commission, USGS 7.5-Minute topographic quadrangle maps: *Del Mar OE W and Del Mar, California (2021)*

Figure 2



11/25/2025 JN 207898 \\Santca1hub\sandca1fs1\Hrook\PDATA\207898 Del Mar CIP PEIR\05 GIS\APRX\207898 - City of Del Mar CIP PEIR Proposal.aprx

Legend

Project Site

CITY OF DEL MAR CIP STREAMLINING PROJECT
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0 0.25 0.5 Miles

Source: Esri, ArcGIS Online, City of Del Mar, San Diego County

Project Study Area

Figure 3

1.2.2 Project Description

The project includes a variety of public infrastructure and facility improvements planned to occur throughout the City. The following summaries describe the general activities associated with each CIP category.

Undergrounding Program

Typical undergrounding projects involve the removal of unsightly existing utility poles and overhead cable lines for electricity and telecommunications, replacing them with underground lines. Construction generally would include trenching, installation of utility lines and conduit in trenches, backfilling trenches, resurfacing pavement, replacement of vegetation that is disturbed during construction, installation of utility structures, and the removal of utility poles and associated equipment. Other construction activities may include retaining walls to support the installation of aboveground utility structures. The majority of construction activities would occur within public rights-of-way or along existing roadways. Installation of underground utility lines would also occur outside public rights-of-way at locations where overhead services currently exist in order to maintain service connections to existing residences and businesses. Similarly, most utility poles are located in or immediately adjacent to public rights-of-way. However, in certain instances, poles may be located outside public rights-of-way, for which work crews would need to traverse existing vegetation to access and remove poles.

Typical construction equipment for utility undergrounding would include backhoes, skid steer loaders, and dump trucks for excavation activities; milling machines, sweepers, asphalt pavers, roller compactors, and dump trucks for asphalt resurfacing; and concrete mixer trucks, dump trucks, and hand tools for concrete resurfacing. Hand digging with an arborist on standby is planned for trenching within 20 feet of protected tree species where work near the tree is unavoidable.

Construction activities associated with utility undergrounding would occur at an average rate of approximately 100 linear feet (LF) per day, with a maximum rate per day of 400 LF. The maximum length of individual CIP utility undergrounding projects would be up to 32,000 linear feet (LF), but would be an average length of approximately 15,000 LF. Average trench widths for these projects would be approximately 2 feet, with a maximum trench width of approximately 3 feet. Average trench depth would be approximately 3 feet, and maximum trench depth would be no greater than 10 feet.

Pole removals are typically performed using a digger derrick truck or bucket truck when accessible from the street. Pole removals in sensitive areas are to be completed via hand; crews would walk in to hand-cut the pole at ground level, fell the pole, cut to manageable pieces, and haul out with a small rubber-tired tractor-trailer or wheelbarrow or use a “boom truck” when close enough to the City right-of-way. Alternately, in rare cases, the utility company may choose to hand-cut the pole at ground level and helicopter the pole out of hard-to-access areas.

After construction, ongoing activities would include regular inspection and, as necessary, maintenance activities, similar to existing underground utility lines maintained by the utility agencies.

Water

Water infrastructure CIP projects include improvements, repairs, and rehabilitation of existing and future potable and recycled water pipelines, valves, pressure reducing stations, pressure relief stations, water

pumping stations, water meters, backflow preventers, and fire hydrants. Construction activities generally involve trenching, backfilling, and resurfacing within public rights-of-way or along existing roadways. In situ pipeline repairs and interior lining may be performed without excavation. Water reservoir improvements would generally involve mechanical and electrical improvements. Typical construction equipment would include backhoes, skid steer loaders, small excavators, dump trucks, paving machines, and hand tools. Construction activities associated with water pipelines would occur at an average rate of approximately 200 LF per day, with a maximum rate per day of 400 LF. The maximum length of individual CIP water infrastructure projects would be up to 5,000 LF, but would be an average length of approximately 1,000 LF. Average trench widths for these projects would be approximately 2.5 feet, with a maximum trench width of approximately 4.5 feet. Average trench depth would be approximately 4 feet, and maximum trench depth would be no greater than 10 feet.

After construction, ongoing activities would include regular inspection and, as necessary, maintenance activities, similar to existing water infrastructure maintained by the City.

Wastewater

Wastewater CIP projects include improvements, repairs, and rehabilitation of existing or future sewer gravity and force main pipelines, pump stations, manholes, and cleanouts. Construction activities would include trenching, backfilling, and resurfacing primarily within public rights-of-way or along existing roadways. Sewer pump station improvements and rehabilitation would generally include mechanical and electrical improvements. Typical construction equipment for wastewater infrastructure would be the same as the typical CIP water infrastructure construction equipment. Construction activities associated with sewer pipelines would occur at an average rate of approximately 200 LF per day, with a maximum rate per day of 400 LF, similar to water pipelines. The maximum length of individual CIP wastewater infrastructure projects would be up to 6,000 LF, but would be an average length of approximately 1,250 LF. Average trench widths for these projects would be approximately 2.5 feet, with a maximum trench width of approximately 3.5 feet. Average trench depth would be approximately 8 feet, and maximum trench depth would be no greater than 15 feet.

After construction, ongoing activities would include regular inspection and, as necessary, maintenance activities, similar to existing wastewater infrastructure maintained by the City.

Storm Water

Storm water CIP projects address both short-term and long-term infrastructure needs, including emergency repairs and improvements to storm drains and compliance with water quality permits. Projects likely would include improvements, repairs, and rehabilitation of existing or future storm water pipelines, culverts, manholes, cleanouts, inlets, outlets, catch basins, headwalls, open channels, cobble/hardscape open swales, infiltration pits, and low-flow diverters. Construction activities generally would involve trenching, excavation, backfilling, and resurfacing, mostly within public rights-of-way or along existing roadways. Typical construction equipment for storm water infrastructure would be the same as the typical water and wastewater infrastructure construction equipment. Construction activities associated with storm water pipelines and culverts would occur at an average rate of approximately 50 LF per day, with a maximum rate per day of 100 LF. The maximum length of individual CIP storm water infrastructure projects would be up to 1,000 LF, but would be an average length of approximately 200 LF. Average trench widths for these projects would be approximately 3 feet, with a maximum trench width of approximately 4 feet.

Average trench depth would be approximately 3 feet, and maximum trench depth would be no greater than 10 feet.

After construction, ongoing activities would include regular inspection and, as necessary, maintenance activities, similar to existing storm water infrastructure maintained by the City.

Streets

Streets CIP projects would generally include annual pavement rehabilitation and Americans with Disabilities Act (ADA) upgrades. Construction activities would generally include excavation, backfill, pavement resurfacing, and repair/placement of curb and gutter, sidewalks, ADA-compliant ramps, and retaining walls. Bridge work would likely involve structural or surface maintenance; bridge replacement would require excavation and installation of new structures. Construction equipment would typically include backhoes, skid steer loaders, dump trucks, asphalt pavers, roller compactors, concrete mixer trucks, and hand tools. Construction activities associated with roadway construction/improvements would occur at an average rate of approximately 500 LF per day, with a maximum rate per day of 2,000 LF. The maximum length of individual CIP roadway projects would be up to 7,500 LF, but would be an average length of approximately 2,500 LF. Additionally, activities associated with curb and gutter construction/improvements would occur at an average rate of approximately 250 LF per day, with a maximum rate per day of 500 LF. The maximum length of individual CIP curb and gutter projects would be up to 3,000 LF, but would be an average length of approximately 500 LF.

After construction, ongoing activities would include regular inspection and, as necessary, maintenance activities, similar to existing roadway infrastructure maintained by the City.

Facilities

Facilities CIP projects relate to various short-term and long-term facility needs related to public safety operations. Improvements and repairs of existing public facilities would generally include minor exterior façade repairs and minor interior improvements, such as painting; new carpeting; replacement of/repairs to plumbing, electrical, and heating, ventilation, and air conditioning (HVAC) units; security/fire system repairs; and roof repairs. Additionally, CIP facilities projects would include the installation of hardscape features (e.g., benches, drinking fountains, streetlights, traffic lights) on City property and public rights-of-way. Construction equipment for these types of CIP facilities projects would generally be limited to hand tools. Small generators and compressors may also be used.

Construction activities associated with the possible future relocation of the fire station and the Public Works building from the floodway may include reconstruction of the buildings to minimize potential impacts associated with flooding. This would be accomplished by either: (1) reconstruction at the existing location through recontouring of the project site or by other means to elevate the new building foundations above the flood elevation; and/or (2) reconstruction at a new location outside the flood zone. Typical construction equipment for these CIP facilities projects would likely include bulldozers, excavators, backhoes, skid steer loaders, concrete mixer trucks, asphalt pavers, roller compactors, sweepers, and dump trucks.

Maintenance of bridges primarily includes concrete repairs to spalling in pier walls, columns, side rails, and sidewalks. Standard maintenance activities associated with bridges would be in compliance with

typical best management practices (BMPs) to ensure no inadvertent direct or indirect impacts to jurisdictional waters or other environmentally sensitive areas.

After construction of the CIP facilities projects, ongoing maintenance activities similar to existing conditions would continue.

Open Space

Open space CIP projects address maintenance needs for the City's existing and future open space amenities, including City parks, trail connections, the beach, and lifeguard facilities. Construction related to improvements and repairs of existing and future public open space facilities would generally include excavation, backfill, and resurfacing activities and the installation of irrigation and landscaping for outdoor improvements. Minor exterior façade repairs associated with lifeguard building improvements would generally include exterior painting, security/fire system repairs, roof repairs, and minor interior improvements such as painting, new carpeting, and replacement of/repairs to plumbing, electrical, and HVAC units. The majority of such construction activities would occur on City property or within public rights-of-way or along existing roadways. Typical construction equipment for CIP open space projects would likely include hand tools for minor improvements, and backhoes, skid steer loaders, concrete mixer trucks, asphalt pavers, roller compactors, sweepers, and dump trucks for major improvements.

After construction of the CIP open space projects, ongoing maintenance activities similar to existing conditions would continue.

1.3 Purpose and Need for Study

The purpose of this study is to evaluate the potential for the City's CIP to impact cultural and paleontological resources within the City limits. As required under CEQA, public agencies must identify and mitigate significant environmental impacts associated with discretionary projects, including those affecting historical, archaeological, tribal cultural, and paleontological resources.

This technical report supports the PEIR by providing a program-level assessment of resource sensitivity across the seven CIP project categories. It identifies areas where ground-disturbing activities may intersect with known or potential cultural and paleontological resources and outlines mitigation strategies to ensure compliance with CEQA Guidelines Section 15064.5 and Section 15126.4(b), Public Resources Code (PRC) Section 21083.2 and Section 21084.2, and AB 52 tribal consultation requirements.

The need for this study arises from the City's responsibility to protect significant cultural heritage and scientific resources while implementing infrastructure improvements. By proactively identifying sensitive areas and establishing a tiered mitigation framework, the City can ensure that CIP projects proceed in a manner that respects and preserves Del Mar's unique cultural and paleontological legacy.

1.4 Lead Agency and Regulatory Context

The City is the lead agency for environmental review under CEQA for its CIP. This Phase I cultural and paleontological resources assessment has been prepared to identify potential historical, archaeological, tribal cultural, and paleontological resources within the project area and to evaluate potential impacts in accordance with CEQA Guidelines Section 15064.5 and Section 15126.4(b). The report is intended to support the PEIR and ensure compliance with applicable state regulations. If any CIP projects receive

federal funding or require federal permits, additional review under the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (NHPA) may be required. See Chapter 2, Regulatory Framework, for further detail.

1.5 Personnel and Qualifications

This report was prepared by a qualified team of cultural and paleontological resource professionals who meet the Secretary of the Interior's Professional Qualification Standards for archaeology and history, and the Society of Vertebrate Paleontology (SVP) standards for paleontology.

James T. Daniels, PhD, RPA, served as the Principal Archaeological Investigator and lead author for the report. Susan Wood, PhD, served as the Senior Architectural Historian, providing oversight for the historic context and built environment impacts assessment and mitigation recommendations. Peter Kloess, PhD, served as the Senior Paleontological Investigator, meeting SVP qualifications for professional paleontological work and overseeing paleontological sensitivity analysis and mitigation recommendations.

Additional support was provided by Rachel Garcia, MA, Associate Archaeologist, Molly Soffietti, MA, Architectural Historian, and Tara Kloess, Associate Paleontologist, who contributed to background research, technical review, and report development.

No field survey was conducted for this programmatic assessment. The report was prepared between May and October 2025 to support the PEIR for the City's CIP.

1.6 Report Organization

This report provides a structured outline for the Program-Level Cultural Resources Technical Report. Chapter 2 provides the cultural and paleontological regulatory framework. Chapter 3 discusses the environmental and cultural setting (including paleontological, archaeological, tribal cultural and historic context). Chapter 4 provides the methods and results of cultural and paleontological resource identification. Chapter 5 analyzes the potential impacts to archaeological, paleontological, and built environment resources. Chapter 6 includes recommended mitigation measures for CIP projects. Chapter 7 presents examples of how to apply the impact assessment strategies and how to select the best mitigation strategy for archaeological, paleontological, and built environment resources for four representative projects. Chapter 8 provides a summary and conclusion for the report. Example language and tables are included to illustrate how to incorporate project-specific information (such as the representative projects) and mitigation strategies. The goal is to ensure clarity, consistency with CEQA and City requirements, and to serve as a template for future use.

2.0 REGULATORY FRAMEWORK

2.1 Federal Regulations

2.1.1 National Historic Preservation Act (NHPA, 1966)

The NHPA (Public Law 89-665; 54 United States Code [U.S.C.] 300101 et seq.) is the cornerstone of federal historic preservation law. Section 106 of the NHPA requires federal agencies to consider the effects of any federal undertaking on "historic properties," which are cultural resources listed in or eligible for the National Register of Historic Places (NRHP). The agency must consult with the State Historic Preservation Officer (SHPO) and other stakeholders, including Native American tribes, following procedures in 36 Code of Federal Regulations Part 800 (Advisory Council on Historic Preservation [ACHP] 2004). In practice, if any Del Mar CIP projects receive federal funding, federal permits, or other federal approvals (a "federal nexus"), the Section 106 review process must be completed. This involves inventory and evaluation of cultural resources within the project's Area of Potential Effects, assessment of project effects on any NRHP-eligible properties, and development of measures to avoid, minimize, or mitigate adverse effects (ACHP 2004). Federal undertakings that adversely affect historic properties cannot proceed until Section 106 consultation is resolved, typically via a Memorandum of Agreement outlining mitigation commitments.

2.1.2 National Environmental Policy Act (NEPA, 1969)

NEPA [42 U.S.C. 4321–4347] requires federal agencies to assess environmental impacts of federal actions, which include impacts on cultural and historic resources, as part of an Environmental Assessment (EA) or Environmental Impact Statement (EIS). Under NEPA, cultural resources are considered in the "affected environment," and any significant impacts to historic properties (usually those protected by the NHPA) must be disclosed and mitigated if possible. NEPA's process dovetails with the NHPA—compliance with Section 106 is typically integrated into NEPA documents (CEQ and ACHP 2013). For the Del Mar CIP, NEPA would apply only if a project is a federal action (for example, if an infrastructure project triggers a federal permit, uses federal funds, or is on federal land). In such cases, the City (or the relevant federal agency) would prepare the appropriate NEPA documentation analyzing cultural resource impacts, in addition to conducting Section 106 review.

In addition, NEPA directs federal agencies to use all practicable means to "preserve important historic, cultural, and natural aspects of our national heritage" (Section 101[b][4]). Consideration of paleontological resources may be required under NEPA when a project is proposed for development on federal land, or land under federal jurisdiction.

2.1.3 Archaeological Resources Protection Act (ARPA, 1979)

ARPA [16 U.S.C. 470aa–470mm] protects archaeological sites and artifacts on federal lands and Indian lands. It requires permits for any excavation or removal of archaeological resources on those lands and imposes penalties for unauthorized artifact removal or site damage. ARPA would be applicable if any CIP project occurs on federally owned land (unlikely within Del Mar City limits) or affects an archaeological site of Native American significance on tribal lands. While most Del Mar projects are on City or private property, ARPA is noted here for completeness in case of any federal land involvement.

2.1.4 Native American Graves Protection and Repatriation Act (NAGPRA, 1990)

NAGPRA [25 U.S.C. 3001 et seq.] provides a process for museums or federal agencies to return Native American human remains and cultural items to descendant communities, and it protects such remains and items discovered on federal or tribal land. If a Del Mar project on federal land were to inadvertently discover Native American human remains or funerary objects, NAGPRA would mandate notification of tribes and repatriation of remains. While Del Mar's CIP projects are not on federal or tribal land, NAGPRA's provisions reflect the sensitivity and legal protection accorded to Native American burials at the federal level. (Separate state laws outlined below protect human remains on non-federal lands.)

2.1.5 Secretary of the Interior's Standards

The Secretary of the Interior (SOI) is responsible for establishing standards for advising federal agencies on the preservation of historic properties that are eligible for or listed in the NRHP. These standards consist of four general types of treatments: preservation, rehabilitation, restoration, and reconstruction. Of the four, the Standards for Rehabilitation (36 Code of Federal Regulations 68.3[b]) is the most likely appropriate treatment for the projects in the PEIR. Rehabilitation is defined as "the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical cultural, or architectural values" (Grimmer 2017: 2). The Standards for Rehabilitation thus acknowledge that a building may retain its historic character even with alterations. Under CEQA Guidelines Section 15064.5(b)(3), "[g]enerally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings, shall be considered as mitigated to a less than a significant impact on the historical resource."

Below are the ten Standards for Rehabilitation:

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.

2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.

3. Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.

4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.

5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.

6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.

7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

8. Archaeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.

9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.

10. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

2.1.6 Paleontological Resources Preservation Act (PRPA, 2009)

The Paleontological Resources Preservation, Omnibus Public Lands Act (Public Law 111-011, Title VI, Subtitle D) of 2009 (PRPA) directs the Secretaries of the US Department of the Interior and US Department of Agriculture (USDA) to manage and protect paleontological resources on federal land controlled or administered by these departments using "scientific principles and expertise." The PRPA codifies existing policies of the Bureau of Land Management, National Park Service, US Forest Service, Bureau of Reclamation, and US Fish and Wildlife Service, and provides the following:

- definitions of "paleontological resources" and "casual collecting";
- criteria for the issuance of resource-use permits; and
- requirements for the collection of paleontological resources and their curation in approved repositories; and penalties (criminal and civil) for the illegal removal, sale, purchase, transport, theft and/or vandalism of fossils from federal lands.

2.1.7 Antiquities Act (1906)

The Antiquities Act of 1906 (16 US Code 431-433) states, in part:

> *That any person who shall appropriate, excavate, injure or destroy any historic or prehistoric ruin or monument, or any object of antiquity, situated on lands owned or controlled by the Government of the United States, without the permission of the Secretary of the Department of the Government having jurisdiction over the lands on which said antiquities are situated, shall upon conviction, be fined in a sum of not more than five hundred dollars or be imprisoned for a period of not more than ninety days, or shall suffer both fine and imprisonment, in the discretion of the court.*

The Antiquities Act was enacted to help protect any historic or prehistoric ruin or monument, or any "object of antiquity" situated on lands owned or controlled by the government of the United States. According to the Antiquities Act, fossil resources are considered to be objects of antiquity. The Antiquities Act has been used to designate national monuments based on the presence of fossil resources at those sites, like those at the Grand Staircase-Escalante National Monument, the Petrified Forest National Park, and others.

2.2 State of California Regulations

2.2.1 California Environmental Quality Act (CEQA, 1970)

CEQA (PRC §21000 et seq.) is California's principal environmental law, requiring state and local agencies to identify and mitigate significant environmental impacts of their actions. In Del Mar, the City is the CEQA lead agency for its CIP projects. Under CEQA, historic and archaeological resources are considered "environmental resources" that require analysis. CEQA defines a "historical resource" broadly to include: (1) resources listed in or determined eligible for the California Register of Historical Resources (CRHR); (2) resources listed in a local register or deemed significant in a historical survey; and (3) any resource that a lead agency finds significant, based on substantial evidence, against CRHR criteria (14 California Code of Regulations [CCR] §15064.5[a]). A project that causes a "substantial adverse change" in the significance of a historical resource—essentially demolition, destruction, relocation, or alteration that impairs the resource's significance—is considered to have a significant impact under CEQA (PRC §21084.1; CEQA Guidelines §15064.5[b]). CEQA requires that significant impacts to historical resources be avoided or mitigated to the extent feasible. Archaeological sites can be treated as historical resources if they are CRHR-eligible. If an archaeological site is not eligible for the CRHR (i.e., not a historical resource), it may still be a "unique archaeological resource" under CEQA (PRC §21083.2). CEQA provides separate mitigation provisions for unique archaeological resources, which generally require reasonable efforts to preserve them in place or, if avoidance is infeasible, data recovery excavations (PRC §21083.2).

In addition, paleontological resources are afforded protection pursuant to CEQA requirements. Appendix G, Part V of the CEQA Guidelines explains significant impacts on paleontological resources. It details that a project would result in a significant impact if it disturbs or destroys unique paleontological resources or a unique geologic feature. Additionally, PRC Section 5097.5 specifies that any unauthorized removal of paleontological remains is a misdemeanor. Penalties for this removal or damage of paleontological resources are set forth in California Penal Code Section 622.5.

2.2.2 California Register of Historical Resources (CRHR)

The CRHR is a statewide program (established by PRC §5024.1 in 1992) that lists resources significant at the local, state, or national level. CRHR eligibility criteria are modeled on the NRHP criteria for significance, encompassing resources associated with important historical events or persons, embodying distinctive characteristics or artistic values, or yielding important scientific information (California Office of Historic Preservation 1995). Under CEQA, any resource that is listed in or eligible for listing in the CRHR is automatically considered a "historical resource" (PRC §21084.1). Thus, evaluation of Del Mar-area properties or sites against CRHR criteria is a key step in determining whether they are protected under CEQA. In practice, a cultural resources technical study for a Del Mar project will include significance evaluations for any identified cultural materials (buildings, structures, districts, archaeological sites, or objects) to determine if they meet CRHR criteria. If they do, CEQA requires impacts on those resources to be analyzed and mitigated. California Historical Landmarks and points of historical interest (designations for very high significance resources) are also treated as historical resources under CEQA. The CRHR provides a baseline for identifying what cultural resources are significant in the project's context.

Age Threshold for Historical Resources

There is no prescribed age limit for listing in the CRHR, although CRHR guidelines state that "sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource" (California Office of Historic Preservation 2001:3). While the NRHP and CRHR generally apply a 50-year threshold to allow for scholarly evaluation of significance, CEQA practitioners often use 45 years as a screening guideline. This proactive approach accounts for project timelines, ensuring resources that may reach 50 years during development are considered early. The 45-year threshold is a best practice—not a statutory requirement—and reflects CEQA's flexibility to evaluate any resource with potential historical significance based on substantial evidence, regardless of age.

2.2.3 California Public Resources Code §5097 and Health & Safety Codes §§7050.5, 7051, and 7054 (Protection of Human Remains)

California law establishes strict requirements for the protection of human remains discovered during ground-disturbing activities, including CIP projects. If human remains are encountered during any CIP excavation, Health and Safety Code Section 7050.5 requires that work stop immediately in the vicinity of the find and that the County coroner be notified. If the coroner determines the remains are Native American, the coroner must notify the Native American Heritage Commission (NAHC) within 24 hours, which then designates a Most Likely Descendant (MLD) tribe (California Health & Safety Code §7050.5; California PRC §5097.98). The lead agency and project proponent must consult with the MLD regarding treatment of the remains, which typically involves leaving remains in place or reburial in a manner consistent with Native American customs. Removal or scientific study is avoided unless expressly approved by the MLD (California PRC §5097.98).

Additional protections under Health and Safety Codes Sections 7051 and 7054 prohibit unlawful removal, mutilation, or disturbance of human remains without lawful authority and impose criminal penalties for violations. These requirements apply to all projects in Del Mar, on both public and private lands, and supersede any other construction priorities upon discovery. The City's standard contractual procedures will reflect these laws by including a "halt work" condition and immediate consultation protocols with the County coroner, NAHC, and designated MLD (California Health & Safety Code §§7050.5, 7051, 7054; California PRC §5097.98).

California PRC Section 5097.5 defines and details the unauthorized disturbance or removal of archaeological, paleontological, or historical resources located on public lands, which is considered a misdemeanor violation:

> *A person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands.*

2.2.4 California Coastal Act (1976) and Local Coastal Program

All of Del Mar lies within California's Coastal Zone, meaning that the California Coastal Act and the City's certified Local Coastal Program (LCP) apply to development projects. The Coastal Act includes a specific policy for cultural resources: Section 30244, which states that "where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required." This policy is mirrored in the City's LCP Land Use Plan, which has been certified by the California Coastal Commission. The LCP requires that any project within the Coastal Zone (which includes essentially the entire City) assess potential impacts to archaeological resources and implement mitigation if impacts are expected. In practice, compliance with CEQA (described above) usually ensures compliance with Coastal Act Section 30244, since CEQA already mandates studies and mitigation for archaeological sites. However, as a condition of Coastal Development Permit approval, the City may impose additional measures specifically to protect cultural resources consistent with the LCP. For example, Del Mar may require on-site archaeological monitoring during grading in areas of high sensitivity (as identified in the City's records or prior studies) as a Coastal Permit condition. Projects in certain overlay zones near the San Dieguito River or coastline might also have LCP policies requiring cultural resource surveys before development. Thus, all CIP projects that need Coastal Development Permits must be reviewed for consistency with these cultural resource protections in the LCP. Notably, the Coastal Act policy covers paleontological resources as well, so fossil-bearing geologic formations disturbed by projects would also require mitigation (addressed further under Paleontological regulations in a separate section if needed).

2.2.5 Assembly Bill 52 (2014)

AB 52 amended CEQA to create a new category of environmental resource ("tribal cultural resources") and to require consultation with California Native American tribes during CEQA review. Tribal cultural resources are defined in PRC Section 21074 as sites, features, places, cultural landscapes, or objects with cultural value to a California Native American tribe, that are either: (1) listed or determined eligible for the CRHR (or a local historic register); or (2) a resource that the lead agency, at a tribe's request, chooses to treat as significant (§21074[a]).

In practice, AB 52 elevates the consideration of Native American resources by ensuring tribes can have input on what resources are significant, beyond just formally recognized historic sites (Government Code §65352.4). Under AB 52, Del Mar (as lead agency) must notify tribes that have requested notice of projects at the start of CEQA environmental review (within 14 days of determining that a CEQA document is required). If a tribe requests consultation within 30 days, the City must consult in good faith with that tribe (PRC §21080.3.1).

Consultation covers potential project impacts to tribal cultural resources, and if impacts are identified, the parties discuss feasible mitigation measures, project alternatives, or modifications that would avoid or lessen impacts (PRC §21080.3.2). The consultation ends when both parties agree on mitigation or if either party, after reasonable effort, concludes that agreement cannot be reached. Any mitigation measures resulting from consultation must be recommended for inclusion in the CEQA document (PRC §21082.3).

For Del Mar's CIP PEIR, AB 52 consultation is a crucial step. The City contacted local tribes (typically Kumeyaay/Diegueño and Luiseño groups with ancestral ties to the area) early in the EIR process. Common outcomes of AB 52 consultation for infrastructure projects include: monitoring agreements (having Native

American monitors on-site during grading in sensitive areas), avoidance of certain areas, redesign of project elements to protect resources, or cultural sensitivity training for construction crews.

AB 52 makes clear that significant impacts to tribal cultural resources should be treated as significant environmental impacts under CEQA, requiring mitigation similar to other cultural resources. Notably, AB 52 does not replace the process for inadvertent discovery of human remains (which involves the NAHC and MLDs, as described above), but it adds a proactive, early consultation to address tribal concerns.

The City will document its AB 52 compliance in the PEIR's consultation section, including any written correspondence with tribes and agreed-upon mitigation.

2.2.6 Other State Laws and Codes

Additional California laws provide context and procedures for cultural resources, though they may be indirectly relevant to Del Mar's CIP. The Native American Historic Resource Protection Act (PRC §§5097.9–5097.991) prohibits public agencies from causing damage to Native American sanctified cemeteries, places of worship, or sacred shrines on public property, except upon a clear public interest showing. This underscores that the City, as a public agency, must avoid harming any known Native American sacred sites on City-owned lands. The NAHC maintains a Sacred Lands File of such sites; a Sacred Lands File search is typically conducted early in project planning.

The California Native American Graves Protection and Repatriation Act (Cal NAGPRA, Health & Safety Code §8010 et seq.) largely mirrors the federal NAGPRA for remains and artifacts under control of state agencies or museums. While not likely triggered by CIP projects, it reflects California's commitment to returning ancestral remains to tribes.

In summary, at the state level, CEQA remains the primary driver for cultural resource protection in Del Mar's projects, supported by the CRHR criteria for significance. CEQA's recent amendments also integrate tribal cultural resources into this framework. The Coastal Act's mandate for mitigating archaeological impacts adds an additional layer for projects in the Coastal Zone, which includes virtually all CIP work in Del Mar. Together, state law and local policy set forth clear processes for consultation and mitigation whenever historical, archaeological, or tribal cultural resources could be affected (City of Del Mar Community Plan; PRC §§5097.9–5097.991; Health & Safety Code §8010 et seq.).

2.3 Local Regulations

2.3.1 City of Del Mark Historic Preservation Overlay Zone

The City established the Historic Preservation Overlay Zone (HP-OZ) (City of Del Mar Municipal Code Chapter 30.58) to safeguard the architectural and historic integrity of properties deemed historically significant within the City limits (City of Del Mar, n.d.-a). Its objectives are twofold:

- To ensure the long-term preservation of designated historic landmark properties for current and future generations.
- To provide architectural control and allow for flexible permitted uses that support the economic viability of historic structures, beyond what is allowed in the underlying zoning provisions.

Boundaries: Properties included in the Historic Preservation Overlay Zone are designated by ordinance and depicted on the official City zoning map. Boundary modifications are subject to City ordinance.

Allowable Uses: Uses permitted within the Historic Preservation Overlay Zone generally align with those allowed by the underlying zone, subject to its regulations. However, the City Council may, after a public hearing, authorize alternative uses for designated historic landmark properties, imposing conditions and restrictions as deemed appropriate. If no specific alternative use or conditions are designated, the underlying zone's criteria apply.

Design Review: Any construction, demolition, relocation, conversion, alteration, or enlargement of buildings or lots within the Historic Preservation Overlay Zone requires approval from the Design Review Board. Key requirements include the following:

- All changes to designated historic landmarks must respect the architectural style, scale, landscaping, and features that led to their historic designation.
- Restoration should use forms, materials, textures, colors, and landscaping typical of the landmark's historical period. Where necessary, alternative building regulations from the California Historical Building Code may be applied.
- Demolition or significant reduction of historic landmarks is only permitted if no viable alternatives exist, and such alternatives must be fully addressed in an EIR under CEQA.

Special Regulations: The City Council, following Planning Commission review and public hearings, may designate any property within City limits as a historic landmark if it contains artifacts of archaeological or paleontological importance or structures of historic significance. Historic significance is defined as:

- Unique architectural style representing a period of California or Del Mar history
- Listing on state or federal registers of historic places
- Association with specific historic events
- Representation of the historic character of a City area

3.0 ENVIRONMENTAL SETTING

This section establishes the context of the project area, including geological setting, paleontological context, natural setting, and cultural context. It provides background information that helps predict and interpret the presence or absence of cultural and paleontological resources.

3.1 Natural Environment

The City is situated on the Southern California coast at the mouth of the San Dieguito River in San Diego County. The Del Mar coastal plain experiences a Mediterranean, semiarid steppe climate with most precipitation occurring in winter (December–April). Annual rainfall generally ranges from approximately 8 to 16 inches (Bowman 1973; Hines 1991:4). This coastal bluff and lagoon environment has been a magnet for human occupation for thousands of years, offering rich marine, estuarine, and terrestrial resources (fish, shellfish, game, freshwater, and diverse plant foods). Before significant changes occurred, the Del Mar area was likely home to six native plant communities: coastal sage scrub, riparian woodland, oak woodland, native grassland, freshwater marsh, and salt marsh. Coastal sage scrub covered many hillsides, ridges, and canyon slopes, with native grasslands like *Stipa*, *Elymus*, *Poa*, and *Muhlenbergia* interspersed throughout. The coastal bluffs were likely composed of a mixture of scrub and grassland species (Beauchamp 1986; Munz 1974).

During the past two centuries, patterns of development and land use have significantly transformed these ecological communities. Currently, many regions are dominated by non-native annual grasses and forbs—such as *Bromus* spp., *Avena* spp., foxtail barley (*Hordeum murinum*), and mustards (*Brassica* spp.)—while developed areas are often landscaped with lawns, non-native tree species, and ornamental plants (Beauchamp 1986; Munz 1974).

Historically, the region supported a diverse assemblage of fauna, including grizzly bear (*Ursus horribilis*), black bear (*Ursus americanus*), mountain lion (*Felis concolor*), bobcat (*Lynx rufus*), mule deer (*Odocoileus hemionus*), coyote (*Canis latrans*), gray fox (*Urocyon cinereoargenteus*), badger (*Taxidea taxus*), ringtail (*Bassariscus astutus*), raccoon (*Procyon lotor*), and striped skunk (*Mephitis mephitis*) (Burt and Grossenheider 1976). Small mammal populations were commonly composed of black-tailed jackrabbit (*Lepus californicus*), brush rabbit (*Sylvilagus bachmani*), desert cottontail (*Sylvilagus audubonii*), California ground squirrel (*Spermophilus beecheyi*), and Botta's pocket gopher (*Thomomys bottae*), as well as various species of mice and rats (Burt and Grossenheider 1976). Raptors such as the red-tailed hawk (*Buteo jamaicensis*) and golden eagle (*Aquila chrysaetos*) were also documented in the area (Peterson 1961). The herpetofaunal community included numerous lizard and snake species, in addition to the western pond turtle (*Clemmys marmorata*) (Stebbins 1966).

As post-glacial sea levels rose, the shoreline progressively shifted landward, resulting in the inundation of valley floors and, in certain cases, the formation of narrow, steep-walled bays (Inman 1983; Orme 1993; Masters 1994; Kern 1995; Waters 1996a, 1996b). The rapid sea level rise observed during the late Pleistocene and early Holocene further displaced the shoreline eastward and flooded valleys, thereby creating pronounced and confined bay structures (Inman 1983). With the deceleration of marine transgression between approximately 6,000 and 3,000 years ago, complex, low-energy coastal environments began to emerge within these submerged stream valleys. This developmental sequence facilitated the transformation of bays into estuaries and lagoons, exemplified by formations such as Los

Peñasquitos Lagoon and San Dieguito Lagoon, which evolved into highly productive estuaries that supported ongoing or recurrent human activity from the early Holocene onward. Concurrently, rocky shorelines diminished while sandy beaches became increasingly prevalent (Perillo 1995). Over the past 3,000 years, the sea level rose an additional 3 to 6 feet (1 to 2 meters), contributing to continued estuarine aggradation; some systems eventually filled with sediment and transitioned into freshwater alluvial environments. During this period, extensive sandy beaches developed, initially in the northern region near Dana Point, subsequently extending southward toward La Jolla, and ultimately giving rise to the expansive Oceanside littoral cell (Inman 1983).

The abundance of resources in this area led to the development of a dense archaeological record. Even where no surface traces remain (due to urban development or natural erosion), buried cultural deposits can exist. To understand the archaeological resources in Del Mar, it is important to review the region's prehistoric cultural chronology and the evidence of past peoples' activities in this locale.

3.2 Paleontological Setting

3.2.1 Geology

California is divided into 11 geomorphic provinces, each defined by unique geologic and geomorphic characteristics. The City is located within the Peninsular Ranges geomorphic province, distinguished by northwest-trending mountain ranges and valleys following the branching San Andreas fault. This geomorphic province also includes physiographic features such as the Los Angeles Basin, the southern members of the Channel Islands, and the continental shelf (California Geological Survey 2002). The Peninsular Ranges province crosses several counties, as well as Baja California. The Pacific Ocean borders it to the west, the Transverse Ranges geomorphic province to the north, and the Colorado Desert geomorphic province to the east. The City sits along the western edge of the Peninsular Ranges Geomorphic province, where crystalline basement rocks of the Jurassic- to Cretaceous-age Santiago Peak Volcanics and the Cretaceous-age Peninsular Ranges Batholith are nonconformably overlain by a "layer cake" sequence of sedimentary strata of late Cretaceous, Eocene, Oligocene, Miocene, Pliocene, and/or Pleistocene age including the local La Jolla Group (Kennedy and Peterson 1975; Kennedy and Moore 1971). Kennedy and Moore (1971) divided the Eocene portion of this sequence into the early middle Eocene-age La Jolla Group and the late middle Eocene-age Poway Group, which together include nine geologic units or formations. The overlying sedimentary strata are representative of a series of intertonguing marine and terrestrial geologic units that accumulated over a period of approximately 10 million years (50 to 40 million years ago) (Howell and Link 1979). A large river system occupied the eastern portion of the San Diego embayment, and, to the west, these alluvial and fluvial paleoenvironments mixed with nearshore marine paleoenvironments in a river-dominated, braid delta. Farther west are paralic, continental shelf, slope, and submarine canyon paleoenvironments. The City sits along the northern edge of this Eocene depositional basin and is directly underlain by strata from the La Jolla Group. Where the San Dieguito River and its tributary meet the ocean, it cuts through younger quaternary alluvium present along the shoreline and exposes several of the middle Eocene-age La Jolla Group members within the north and central parts of the City. The State of California Department of Water Resources (1967) estimated that the sediment thickness of the floodplain varies from 100 to 150 feet.

The project is depicted on the Kennedy and Tan (2008) geologic map of the San Diego 30' x 60' quadrangle, California, California Geological Survey Regional Geologic Map at a scale of 1:100,000. According to this

geologic map, the City is underlain by eight sedimentary geologic units ranging in age from the middle Eocene to Holocene; these are described further below, starting with the youngest.

Artificial fill (af) (late Holocene). This unit consists of modern trash, sediment, and rock that have been displaced and deposited by humans to the given area. These sediments are Late Holocene in age and lack natural deposition. This unit is assigned no paleontological sensitivity unless the underlying native sediments below the fill layer are reached.

Marine beach deposits (Qmb) (late Holocene). This unit consists of unconsolidated beach deposits composed of fine- and medium-grained sand. Because of their young geologic age, these deposits are unlikely to be old enough to produce fossilized material (less than 4,200 years old). Such deposits are typically assigned a low paleontological potential based on their relatively young geologic age and lack of recorded fossil collection localities; however, these deposits may be underlain in the subsurface by a unit assigned a high paleontological potential (e.g., the Delmar Formation or Torrey Sandstone; see below). This unit has been assigned a low paleontological sensitivity at the surface and high paleontological sensitivity at depth.

Paralic estuarine deposits (Qpe) (late Holocene). This unit consists of unconsolidated estuarine deposits, and is composed mostly of fine-grained sand and clay. Similar to the marine beach deposits, such deposits are typically assigned a low paleontological potential based on their relatively young geologic age and lack of recorded fossil collection localities; however, these deposits may be underlain in the subsurface by a unit assigned a high paleontological potential. This unit has been assigned a low paleontological sensitivity at the surface and high paleontological sensitivity at depth.

Young alluvial flood-plain deposits (Qya) (Holocene and late Pleistocene). This unit consists of poorly consolidated, poorly sorted, permeable floodplain deposits of sandy, silty, or clay-bearing alluvium. Young alluvial deposits occur along the floors of modern drainages and underlie much of the northern portion of the project area. The upper portion of these deposits dates to less than 11,700 years old. Deposits from the middle to early Holocene (older than about 5,000 radiocarbon years) are considered scientifically important or significant (Society of Vertebrate Paleontology 2010). Holocene-age deposits may overlie older alluvium of Pleistocene age at unknown but potentially shallow depths. Evidence of scientifically significant fossils are known from the older, late Pleistocene (11,700–126,000 years ago) sediments within this geologic unit elsewhere throughout Southern California (Miller 1971; Reynolds and Reynolds 1991; Bell et al. 2004; Springer et al. 2009) though few localities have been recovered from these alluvial deposits near the City. This unit has been assigned a moderate paleontological sensitivity at all depths due to the few previously recorded fossil localities near the City.

Old paralic deposits, Units 2–4 and 6 (Bay Point Formation) (Qop) (late to middle Pleistocene). This unit consists of poorly sorted, moderately permeable, reddish-brown, interfingered strandline, beach, estuarine, and colluvial deposits composed of siltstone, sandstone, and conglomerate. Unit 6 has been dated to the late Pleistocene (approximately 120,000 years old), while deposits from Units 2–4 date to the middle Pleistocene (approximately 413,000 to 220,000 years old). These deposits rest on the now emergent wave-cut abrasion platforms preserved by regional uplift. Old paralic deposits, Units 2–4 and 6 underlie most of the western and southern portions of the project APE at the surface, as mapped by Kennedy and Tan (2008). More specifically, deposits from Unit 6 rest on the Nestor terrace of Kern and Rockwell (1992), These deposits are broadly equivalent to the nearshore marine and nonmarine deposits of the Bay Point Formation of Kennedy and Peterson (1975).

Old paralic deposits are paleontologically productive and have produced a vast assemblage of diverse vertebrate, invertebrate, and plant fossils including trace fossils, flowering plants, foraminifera, marine invertebrates (e.g., corals, polychaete worms, bryozoans, clams, mussels, scallops, oysters, pen shells, jingle shells, chitons, tusk shells, snails, bubble snails, sea urchins, heart urchins, sand dollars, crabs, ghost shrimp, mantis shrimp, barnacles, and ostracods), marine vertebrates (e.g., rays and bony fish), and terrestrial vertebrates (e.g., amphibians, lizards, birds, rodents, rabbits, giant ground sloth, horse, camel, and bison). Sediments from this unit are assigned a high paleontological sensitivity at all depths due to their age and abundant marine invertebrate, marine vertebrate, plant, and terrestrial vertebrate fossil specimens.

Very old paralic deposits (Lindavista Formation) (Qvop) (middle to early Pleistocene). The very old paralic deposits consist of poorly sorted, moderately permeable, reddish-brown, interfingered marine and/or non-marine strandline, beach, estuarine and colluvial deposits composed of siltstone, sandstone, and conglomerate sediments (Kennedy and Peterson 1975). The deposits rest directly on an elevated marine abrasion platform (sea floor) that was eroded directly into older Eocene-age geologic units. More specifically, these deposits rest on the Tierra Santa Terrace platform (approximately 930,000 years old) and the Linda Vista Terrace platform (approximately 855,000 years old) of Kern and Rockwell (1992), and are broadly equivalent to Quaternary very old paralic deposits, Units 8 and 9, respectively, of Kennedy and Tan (2008).

Very old paralic deposits have produced trace fossils in the form of borings and burrows, as well as internal molds of clams. Outside the City in San Diego County, in the neighborhoods of Tierrasanta and Mira Mesa, this unit has produced remains of nearshore marine invertebrates (e.g., clams, scallops, snails, barnacles, and sand dollars), as well as sparse remains of marine vertebrates (e.g., sharks and baleen whales). This unit has been assigned a moderate paleontological sensitivity at all depths due to the paucity of previously recovered, scientifically important invertebrate or vertebrate fossil specimens near the City.

Torrey Sandstone (Tt) (middle Eocene). This unit consists of white to light-brown, medium- to coarse-grained, moderately well-indurated, massive and broadly cross-bedded, arkosic sandstone deposited in a nearshore marine environment. The middle Eocene-age (approximately 49 to 48 million years old) Torrey Sandstone underlies much of the central and southeastern portion of the City and likely underlies the Bay Point Formation and Lindavista Formation in the subsurface within the City. This unit is known as the Torrey Sand Member of Hanna (1926) and was named for exposures at Torrey Pines State Park. It is now considered a formation of the La Jolla Group (Kennedy and Moore 1971). In some places this unit is indistinguishable from the Friars Formation (Tf), which is described as nonmarine and lagoonal sandstone and claystone (Kennedy and Moore 1971).

The Torrey Sandstone is rich in vertebrate fossils, including terrestrial mammals and marine invertebrates. Known localities have produced trace fossil burrows, as well as fossil impressions and remains of a diverse flora of vascular plants, marine invertebrates (e.g., corals, polychaete worms, brachiopod, clams, oysters, tusk shells, snails, sea urchins, an insect, barnacles, crabs, and shrimp), marine vertebrates (e.g., sharks and bony fishes), and terrestrial vertebrates (e.g., lizard, bird, and rodents). This unit has been assigned a high paleontological sensitivity at all depth on the basis of the numerous previously collected vertebrate, invertebrate, and plant fossil specimens (SVP 2010).

Delmar Formation (Td) (middle Eocene) – The Delmar Formation is a dusky-yellowish-green, sandy, claystone interbedded with medium gray, coarse-grained sandstone. This unit is the Delmar Sand Member

of Hanna (1926) and was named for exposures in the sea cliffs at Del Mar. It is now considered a formation of the La Jolla Group (Kennedy and Moore 1971). The middle Eocene-age (approximately 50 to 49 million years old) lagoonal and estuarine deposits of the Delmar Formation are exposed at the surface along the western edge and part of the central portion of the City and underlies the Torrey Sandstone elsewhere within the project area.

The Delmar Formation has produced fossil specimens including trace fossils (e.g., borings and burrows) and fossil remains of plants, marine invertebrates (e.g., bryozoans, snails, clams, mussels, oysters, crabs, barnacles, ostracods, and sea urchins), marine vertebrates (e.g., sharks, rays, and bony fishes), and terrestrial vertebrates (e.g., lizard, turtle, crocodile, rodent, stem perissodactyl, and tillodont).This unit has been assigned a high paleontological sensitivity at all depths due to its age (middle Eocene) and known fossil specimens.

3.2.2 Soils

Soils across the City vary depending on elevation and distance from the shoreline and rivers. In the northern half of the City, much of the soils are dominated by silty and sandy loams, such as the Corralitos Series and Huerhuero Series (NRCS n.d.), from the deposition of sediments along the San Dieguito River. In the southern and eastern portions of the City, covering approximately 30 percent of the entire study area, Marina series soils depict a higher gradient and more seasonal runoff-dependent depositional environment further away from fluvial channeling. Along the western margin of the City, Coastal Beaches, Tidal Flats, and Terrace Escarpments can be found associated with the intermixing of the ocean with runoff and fluvial channels. Throughout the City, much of the land has already been developed, and so pockets of Made Land make up almost 20 percent of the whole area. These and several other minor soil types are described below (**Table 1**).

TABLE 1: SOILS WITHIN THE CITY OF DEL MAR

Soil Name	Soil Description	Percent of City
Carlsbad Urban Land Complex (USDA 2009a)	This series consists of brown, pale brown, and very pale brown slightly acid gravelly loamy sand A horizons, pale brown and light brown, slightly and strongly acid heavy loamy sand C horizons underlain by weakly cemented duripans at a depth of 38 inches.	2.9%
Coastal Beaches (NRCS, n.d.)	Coastal beaches comprise the land directly exposed to wave action along a shoreline and contain loose, granular, coarse-textured sedimentary soil composed mostly of mineral particles (commonly quartz) and shell fragments. Other components include silt and clay in protected bays or dune bases and may be rich in carbonate from shell, coral and other organic sources. Heavy minerals such as ilmenite, magnetite, and garnet are often present in trace amounts based on the source rock for the mineral component.	3.7%
Corralitos loamy sand (USDA 1993)	This series consists of deep, somewhat excessively drained soils that formed in recent sandy alluvium derived from acid sandstone and related rocks. Corralitos soils are on alluvial fans and in small valleys and have slopes of 0 to 15 percent. The mean annual precipitation is about 20 inches and mean annual air temperature is about 14.5 degrees Celsius.	3.7%
Huerhuero Complex (USDA 2020)	The Huerhuero series consists of very deep, moderately well drained soils that formed in alluvium derived from material weathering from sandstone and other sedimentary rocks. Huerhuero soils are on old alluvial fans and marine terraces and have slopes of 0 to 30 percent. The mean annual precipitation is about 305 millimeters and the mean annual air temperature is about 17 degrees Celsius.	12.2%

TABLE 1, CONTINUED

Soil Name	Soil Description	Percent of City
Made Land (NRCS, n.d.)	Sediment and other materials brought to its current location by human activity such as construction. Generally called artificial fill, it has a highly variable thickness, geological makeup depending on the original source.	19.5%
Marina Series loamy and coarse sand (USDA 2024)	The Marina series consists of very deep, somewhat excessively drained soils formed in old eolian deposits. Marina soils are on fluviomarine terraces, marine terraces, and coastal plains and have slopes of 0 to 30 percent. The mean annual precipitation is about 400 mm and the mean annual air temperature is about 17 degrees Celsius.	30.1%
Terrace Escarpments (NRCS, n.d.)	Terrace escarpments are the remnants of alluvial plains or escarpments which have highly variable profiles, are generally xerorthenic, and have very high runoff erosion and low drainage.	7.5%
Tidal Flats (Britannica n.d.)	These deposits are made of moderately saline sediments at or near sea level that are commonly flooded by tidal action. Sediment types generally consist of mud and silt accumulated during tidal flooding periods that are rich in dissolved nutrients, plankton and organic debris. The varying influence of fresh and saline water also causes high variability in temperature, salinity, and acidity of sediments.	8.0%
Tujunga Sand (USDA 2017)	The Tujunga series consists of very deep, somewhat excessively drained soils that formed in alluvium from granitic sources. Tujunga soil is on alluvial fans and floodplains, including urban areas. Slopes range from 0 to 12 percent. The mean annual precipitation is about 450 mm and the mean annual temperature is about 18 degrees Celsius.	12.4%

3.2.3 Hydrology and Topography

The City is situated partially on an inland coastal terrace and partially on a delta bordered by a low-lying beach to the north. It is adjacent to the floodplain of the San Dieguito River. The coastal terrace has a seaward margin with vertical to near-vertical cliffs, and along its central and southern shoreline, beaches are generally eroding at a rate faster than new sediment can refill from river flooding, which has led to several large-scale erosion control projects across Del Mar over the last half a century (Kuhn and Shepard 1984). The City has an average elevation of 110 feet.

The San Dieguito River, which runs through the City, is one of the largest rivers in San Diego County. Major floods have occurred historically, the most recent in March 1938. At present, two water-storage dams, Lake Hodges and Lake Sutherland, are located on the river. Little usable beach sand or other sedimentary material reaches the coast today; instead, it is deposited behind the dams (Kuhn and Shepard 1984).

3.3 Precontact and Archaeological Context

Over the past century, archaeologists have refined several chronological frameworks to interpret the cultural history of coastal San Diego and, by extension, Del Mar. Early models, such as those by Malcolm Rogers, introduced a sequence of material cultures—San Dieguito (Paleoindian), La Jolla (Archaic), and Yuman (Late Prehistoric)—distinguished by their artifact assemblages and subsistence strategies (Rogers 1945). Later, Wallace expanded these ideas into broader regional horizons, emphasizing developments such as seed grinding and shellfish collecting during the Archaic period, and the appearance of new technologies and traits in the Late Prehistoric era (Wallace 1955). Subsequent scholars contributed further refinements, debating whether changes in the archaeological record represented population replacement or cultural continuity. The current consensus synthesizes these perspectives, recognizing three main

periods—Paleoindian, Archaic, and Late Prehistoric—while incorporating older terminology for specific site types and local traditions (Moratto 1984; Sutton and Gardner 2010; Warren 1968; Bull 1987).

This developed framework allows for nuanced interpretation of Del Mar's archaeological record and supports an understanding of how local adaptations and outside influences shaped the region's precontact history. The following section applies this chronological structure to examine the earliest human occupation in Del Mar, beginning with the Paleoindian period and tracing cultural developments through subsequent eras.

3.3.1 Paleoindian Period (ca. 12,000–8,500 years BP)

The antiquity of human occupation in the New World has been the subject of considerable interest and debate for more than a century. At present, the most widely accepted model is that humans first entered portions of the western hemisphere lying to the south of Alaska between about 13,000 and 12,000 BC, either along the Pacific coastline or through an ice-free corridor between the retreating Cordilleran and Laurentide segments of the continental glacier in Canada, or along both routes. While there is no generally accepted evidence of human occupation in coastal southern California prior to about 11,000 BC, ages estimated at 48,000 years and even earlier sometimes have been reported (e.g., Bada et al. 1974; Carter 1980). However, intensive interest and a long history of research into the early occupation of North America has begun to reveal sites with widely accepted evidence dating prior to 13,000 BC, such as Cooper's Ferry, ID (Davis et al. 2019) and White Sands, NM (Bustos et al. 2018).

Paleocoastal occupation in the Del Mar area dates to the terminal Pleistocene and early Holocene (circa 12,000–8500 years BP or 10,050–6,550 BC). During this period, sea levels were lower and the coastline in Del Mar would have been several kilometers farther west than today, meaning some early coastal sites may now lie submerged offshore (Erlandson et al. 2007). The first inhabitants likely arrived in Southern California by the late Pleistocene, potentially via a Pacific coast migration route known as the "kelp highway" (Erlandson et al. 2007). However, direct evidence of humans before circa 10,000 BP in the San Diego coastal zone is sparse and often controversial.

Regional claims regarding Early Man discoveries often reference the crude nature of lithic assemblages or their Pleistocene geological contexts (Carter 1957, 1980; Minshall 1976, 1989; Reeves et al. 1986). In the 1970s and early 1980s, the amino acid racemization technique was used to estimate Pleistocene ages for certain coastal southern California sites (Bada et al. 1974), but later accelerator mass spectrometry (AMS) radiocarbon dating did not support these findings (Taylor et al. 1985). One notable case is the discovery in 1929 of a human skeleton from a sea cliff north of Del Mar, known as "Del Mar Man." Initial estimates using amino acid racemization suggested an age of about 48,000 years, much older than other recognized New World remains, though these results were controversial. Subsequent analyses with improved methods indicate a mid-Holocene age (Stafford and Tyson 1989), leading most researchers to assign the remains to the early Holocene, approximately 9,000 years BP. The individual was buried in a flexed position, a practice seen in later prehistoric burials, which may point to cultural continuity (Rogers 1974; Stafford and Tyson 1989).

The currently accepted chronology places initial occupation of coastal San Diego by at least 10,000–9,500 BP, after the Ice Age glacial retreat (Moratto 1984; Warren et al. 2008). By this time, small bands of hunter-gatherers were present around Del Mar and the San Dieguito River valley. Environmental reconstructions suggest a cooler, wetter climate than today, with productive wetlands (ancestral lagoons) at places like the

San Dieguito and Peñasquitos estuaries attracting game and providing plant foods. These first inhabitants were highly mobile and exploited a range of resources, but their archaeological signature is dominated by flaked stone tool assemblages rather than shellfish or seed-processing remains. This pattern corresponds to what Malcolm J. Rogers defined as the San Dieguito Complex, San Diego's Paleoindian cultural pattern (Rogers 1945).

San Dieguito sites typically lack the shell middens and milling stones that appear in later periods; instead, they contain an abundance of large stone scrapers, heavy choppers, bifacial knives, and lanceolate or stemmed projectile points, with a near-absence of bone or shell refuse. Rogers and later Warren (1967) interpreted this toolkit as evidence of a hunting-oriented economy focused on now-extinct Pleistocene megafauna or other game. Indeed, Paleoindian groups in the Del Mar region probably hunted deer, pronghorn, and small game in the uplands and river valleys, supplemented by gathering wild plants; their camps were likely short-term encampments that left few organic remains (Warren 1967; Byrd and Reddy 2002). Notably, early sites in the area yield almost no fishing gear or shell, implying limited use of marine foods during this initial period, in contrast to the intensive shellfish collecting that developed later (Byrd 1998).

Despite the emphasis on hunting tools, there is no clear evidence that Del Mar's Paleoindian inhabitants were strictly big-game specialists. Recent analyses suggest their subsistence was generalized, and the absence of milling tools in Paleoindian assemblages could be a functional difference rather than indicating a wholly separate culture. In other words, so-called "San Dieguito" sites may represent activity-specific loci (e.g., quarry sites or seasonal hunting camps) of the same people who also used coastal resources at base camps that have since eroded or been obscured (Bull 1987; Gallegos 1987). This hypothesis has been a matter of debate: Rogers and others saw San Dieguito as an entirely distinct cultural tradition preceding the Archaic La Jolla Complex, whereas researchers like Bull and Gallegos argue the distinction might be one of site function and taphonomy, not different populations. For example, heavy scrapers and large blades could have been used for processing plant bulbs or agave in inland areas, tasks that leave little midden evidence, while the same group's coastal shellfish-gathering camps (with abundant shell and milling stones) might appear in the archaeological record as "La Jolla" sites a bit later (Hale 2001; Kaldenberg 1982). Nonetheless, by around 9000 BP, a recognizable shift occurs in the archaeological record of coastal San Diego County. Sites begin to include shell midden debris and milling implements, marking the onset of the Archaic (Encinitas tradition) in this region.

The Paleoindian San Dieguito pattern thus represents the tail end of the Pleistocene adaptation—small bands ranging over large territories, camping on terraces and hills above water sources, and practicing a broad-spectrum foraging economy with an emphasis on terrestrial game. Archaeologically, this period is evidenced by a few find spots and site components in the Del Mar vicinity. These include the CW Harris Site (CA-SDI-149), which is located inland along the San Dieguito River valley and is the type-site for the San Dieguito Complex. The site contains stratified deposits dating to approximately 10,000–8,500 BP. Its assemblage of large bifaces, scrapers, and gravers, with minimal shell or milling tools, suggests a hunting-oriented economy (Rogers 1966; Warren 1967).The "Del Mar Man" skeleton, discovered in 1929 eroding from a sea cliff north of Del Mar, was initially misdated to 48,000 BP but later corrected to around 9,000 BP using modern radiocarbon methods (Stafford and Tyson 1989; Bada 1985). This burial, in a flexed position, aligns with later mortuary traditions and supports cultural continuity from the Paleoindian into the Archaic period. Additional isolated Paleoindian artifacts—such as fluted points and crescentic bifaces—found in lagoon and terrace settings further affirm the presence of early foragers in the region (Erlandson et al. 2007; Moss and Erlandson 2013; Beck and Jones 2010). These finds, though not from

intact sites, serve as horizon markers and suggest that Paleoindian groups exploited a range of habitats, including marshes and uplands.

Each illustrates a different facet of the Paleoindian presence: stone tool technology and subsistence activities on one hand, and mortuary practice and physical anthropology on the other. Together, they confirm that people were present in the Del Mar area by approximately 10,000 years ago, living in an environment of marshes, grassy plains, and oak woodlands that existed where suburban tracts and lagoons are found today. Importantly, the Paleoindian period here shows both continuity and change—cultural continuity in the sense that some early tool types (large bifaces, crescents, etc.) persist into the early Archaic, and change in the eventual addition of new tools and subsistence focus that define the Archaic La Jolla pattern. Modern archaeologists generally view the Del Mar area's prehistory as a continuous sequence beginning with these terminal Pleistocene foragers, who gradually transitioned (by circa 7500–6000 BP) into more sedentary coastal peoples without any wholesale population replacement (Scheib et al. 2018; Warren et al. 2008). In summary, the Paleoindian (San Dieguito) period in Coastal San Diego—as exemplified around Del Mar—is characterized by a low-density, highly mobile occupation focused on hunting and general foraging, leaving behind a material record of flaked-stone tools but few permanent sites. Our understanding of this phase comes from a handful of key sites and finds, which are outlined below.

3.3.2 Archaic Period (Millingstone/La Jolla Complex, circa 8,500–1,300 BP)

The Archaic in coastal San Diego (ca. 7500–1300 BP) was a long-lived era of broad-spectrum foraging marked by shellfish gathering, seed processing, and relatively stable cultural continuity. Archaeologists often label this Archaic pattern the Encinitas Tradition (after Warren 1968), corresponding in this region to the La Jolla Complex along the coast and the coeval Pauma Complex inland. During this period, people exploited rich coastal lagoons and estuaries—leaving extensive shell middens of marine mollusks (especially clams, mussels, oyster, Donax)—and also made heavy use of land plants and small game, as evidenced by abundant stone grinding tools (manos and basin metates for seeds) and hunting implements in their sites (Wallace 1955; Gallegos 1992). Flexed inhumation burials in shell middens are another hallmark of the Encinitas/La Jolla pattern (Moriarty 1966). Artifact assemblages show a reliance on cobble stone tools (choppers, scrapers), large projectile points, and few if any pottery or small arrow points, consistent with a pre-bow and arrow technology (Moratto 1984; Rogers 1945). These traits define a long span of cultural adaptation once termed the "Milling Stone Horizon," emphasizing seed-grinding tools (Wallace 1955) and now often called the Encinitas Tradition in this region (Warren 1968). Importantly, this Archaic pattern is seen by most modern researchers as an in situ development from earlier Paleoindian times, rather than a wholly new population (Warren et al. 2008).

As mentioned previously, early archaeologists devised various chronological schemes that have since converged. Malcolm Rogers originally defined the La Jolla Archaic period to date to circa 7500–3000/1300 BP (Rogers 1945). Later, William Wallace's (1955) Southern California sequence relabeled the Archaic as part of a widespread "Milling Stone Horizon" (6000–3000 BC) characterized by seed-grinding and coastal gathering. In San Diego, James Moriarty subdivided the Archaic (La Jolla Complex) into Phases I, II, III based on artifact changes and burial practices (Moriarty 1966). Phase I (circa 7500–5000 BP) saw the first intensive shell midden sites with mostly undifferentiated toolkits and exclusively flexed burials; Phase II (5000–3000 BP) showed larger, more complex sites, possible cemetery areas with more consistent northward burial orientation and inclusion of milling equipment in graves, and continued absence of the bow/arrow; and Phase III (3000–1300 BP) exhibited some influence from outside (e.g., possible adoption

of mortar and pestle for acorns, slight changes in artifact styles) and may represent a transitional Late Archaic prior to the introduction of bow and pottery (Moriarty 1966; Byrd 1998). In the inland areas, Delbert True identified the contemporary Pauma Complex to describe Archaic-period sites without shell near the interior valleys (True 1970). Pauma sites closely resembled coastal La Jolla assemblages (dominated by manos, metates, and cobble tools), but lacked fish and shellfish remains due to their location. True initially hypothesized minor distinctions (e.g., more leaf-shaped bifaces and occasional "Porter" projectile points inland), and suggested Pauma might reflect an inland adaptation or perhaps an influx of people from the desert around mid-Holocene times (True 1966; True 1970). Warren (1968) later subsumed both La Jolla and Pauma under the broad Encinitas Tradition, arguing they were local environmental variants of one long span of cultural continuity rather than separate cultural units—an interpretation now widely accepted.

In the 1960s, Claude Warren's research was pivotal in reframing the Archaic as a time of cultural stability and in-place development. He noted that the Southern California Archaic showed many consistent traits (e.g., shell middens, milling tools, flexed burials) across millennia and across coastal/inland locales, which he termed the Encinitas Tradition (Warren 1968). This contrasted with Rogers's earlier view of population replacement. Warren (1968) proposed that the same basic population had persisted since early Holocene times, adapting locally to environmental shifts. For example, as San Diego's marshes silted up around 5000–3000 BP, sites suggest some subsistence shifts (a decline in shellfish reliance at certain lagoons) but no evidence of a new culture arriving (Gallegos 1987; Masters and Gallegos 1997). Continuity is also seen in lithic technology: heavy use of locally available quartzite and metavolcanic cobbles continued throughout the Archaic, with no sudden changes in tool types until the bow and arrow appears (ca. 1300–800 BP) (Warren et al. 1998). Researchers Bull and Gallegos further argued that even the supposed earlier "San Dieguito" toolkit (big scrapers, large points, etc.) might actually represent a specialized activity facies of the same Encinitas/La Jolla peoples; in their view, sites without shell and grinding tools—once thought to be a separate San Dieguito culture—could have been special-use procurement camps of Archaic people, not evidence of a different population (Bull 1987; Gallegos 1987). While not all scholars fully accept that extreme unity (Warren 1987), the consensus today strongly favors in situ cultural development for the Archaic of the Coastal San Diego and Del Mar region, with any changes largely due to evolving local practices or limited diffusion of new ideas rather than wholesale population replacement (Warren et al. 2008, 344; Sutton and Gardner 2010).

The Archaic period in the South Coastal San Diego area was remarkably long, and archaeologists have noted gradual shifts in settlement and subsistence within it. Early in the Archaic (e.g., La Jolla Phase I), as sea level rise stabilized, groups established semi-sedentary villages near productive estuaries such as San Elijo and Batiquitos Lagoons. These early Archaic camps feature abundant shellfish remains and fishing gear, indicating a heavy maritime focus augmented by plant gathering and hunting of small game (Byrd 1998; Noah 1998). For instance, large deposits of Donax clam, scallop, and mussel shell are found in early Archaic middens at San Elijo and adjacent coastal sites, along with bone fishhooks, shell gorges, and projectile points for spearing fish and game (Byrd 2018; Moriarty 1966). Terrestrial resources were also important; stone tools for processing yucca, agave, and seeds are ubiquitous, and skeletal remains show wear patterns consistent with a mixed maritime-terrestrial diet (Sutton and Gardner 2010).

Mid-Holocene climate and environmental changes between roughly 5000–3000 BP led to some adaptive adjustments. Several coastal lagoons (e.g., Los Peñasquitos Lagoon, Batiquitos Lagoon) became more marshy or even closed, reducing shellfish productivity (Gallegos 1987; Masters and Gallegos 1997). In response, Archaic groups appear to have intensified use of upland resources as evidenced by increased

frequencies of mortars and pestles in the later Archaic, suggesting greater reliance on hard seeds or acorns by around 4000–3000 BP (True 1970; Glassow 1996). Sites of this age in inland north San Diego County (Pauma complex sites) show abundant bedrock milling features for acorn processing, likely corresponding to the establishment of oak woodland resource use as a significant subsistence element (True 1970; Christenson 1990). Nevertheless, coastal foraging did not disappear: at San Diego Bay and the San Dieguito River mouth, for example, shell midden sites continued to be occupied right through the Late Holocene, indicating that where estuaries remained open (as San Diego Bay did), Archaic people kept a marine-focused economy well into the Late Period (Gallegos and Kyle 1988; Byrd 1998). In essence, Archaic people became more diversified over time—initially clustering at lagoons and bay shores, then gradually broadening their settlement to include river valley villages and seasonal inland camps when conditions required, all while maintaining core cultural traditions.

During the Archaic period in the Del Mar coastal region, ancestral Kumeyaay (Encinitas tradition) communities thrived for millennia by exploiting coastal lagoons, bays, and inland foothills in a flexible seasonal round. They left dense shell middens at places like Los Peñasquitos and San Elijo Lagoons representing large base camps of a maritime/terrestrial mixed economy (Byrd 1998). Despite some shifts—e.g., adjusting to lagoon silting by focusing more on plant foods—these groups show strong cultural continuity. The names given by archaeologists have varied ("La Jolla," "Encinitas," "Millingstone"), but all denote this long, relatively unbroken tradition of shellfish collecting, seed grinding, and flexed-burial ceremonialism. There is little evidence for abrupt population replacements in the Archaic archaeological record of this area (Warren 1968; Bull 1987). Instead, the archaeological record demonstrates gradual changes consistent with innovation and outside influence grafted onto a persistent local tradition. By the end of the Archaic (circa AD 500–800), the people of coastal San Diego had adopted important new subsistence tools (the bow and pottery) and possibly absorbed new ethnic groups, yet their fundamental way of life—a diversified foraging strategy in coastal-inland ecotones—remained basically intact (Gallegos 1992: 33; Sutton and Gardner 2010).

In summary, the Archaic Encinitas tradition of the Del Mar area represents a remarkably long-lived cultural adaptation with continuity in technology, settlement, and subsistence, onto which the traits of the Late Prehistoric were later superimposed rather than wholesale replaced (Warren 1968; Warren et al. 2008). This perspective harmonizes earlier models: Rogers's San Dieguito–La Jolla sequence is now seen as an early and late facet of one continuum, and Wallace's broad "Milling Stone" horizon is validated by the enduring nature of the Archaic lifeway, even as refinements (True's Pauma inland complex, Moriarty's phases) add detail about internal developments. The result is a synthesized chronology in which "La Jolla/Encinitas" (Archaic) is understood as a prolonged period of cultural stability and gradual change, bridging the Paleoindian past and Late Prehistoric future in the Del Mar region (Moratto 1984; Sutton and Gardner 2010).

3.3.3 Late Prehistoric Period (ca. 1300 BP–AD 1769)

The Late Prehistoric period in coastal San Diego corresponds to the emergence of the Cuyamaca Complex or Yuman tradition, associated with ancestral Kumeyaay (Diegueño) peoples (True 1970: 15-17; Rogers 1945: 180). Several major innovations mark this period in the Del Mar region. Pottery appears consisting of brown, lightly fired ceramic ware used for cooking and storage alongside continued stone vessel use. Projectile points become predominantly small "Desert Side-notched" and triangular Cottonwood types, signifying full adoption of the bow and arrow in place of the atlatl (spear-thrower) (Yohe 1992: 158; Warren et al. 2008: 85). Notably, cremation of the dead replaces inhumation; human remains were commonly

burned and buried as ash and bone fragments, often with funerary offerings, a sharp break from earlier interment practices (True 1970: 32; Warren 1964: 17). Archaeologists interpret these changes as evidence of incoming Yuman-speaking populations from the lower Colorado River region who blended with or displaced earlier groups (Meighan 1954). By the Late Prehistoric, settlements became somewhat more permanent and shifted slightly inland—for example, coastal villages relocated to reliable freshwater sources and acorn-yielding oak groves just a few miles from the shore (McDonald and Eighmey 2008: 117-118). Archaeologically, Late Prehistoric sites around Del Mar (e.g., villages near today's San Dieguito and Peñasquitos Lagoons) show evidence of acorn processing (bedrock mortars and abundant pestles), increased hunting of deer and rabbits, more trade goods (e.g., obsidian arrowheads from distant regions), and shell bead production. By the time of European contact (AD 1769), the Del Mar area was part of the territory of the Kumeyaay people, who had established semi-sedentary village sites along the San Dieguito River and Lagoon—the culmination of the cultural developments traced above.

Late Prehistoric material culture in the Del Mar region reveals both continuity from the Archaic and the infusion of new technologies. Manos and metates continued in use for pulverizing foods like acorns, but were now joined by mortars and pestles (stone bowl mortars and cylindrical pestles) as acorn flour became a dietary staple after AD 800 (True 1970: 43; Glassow 1996: 25). The appearance of these deep grinding tools marks a significant innovation in food processing, as acorns require pounding, leaching, and cooking to make them edible. Pottery technology, entirely absent in earlier periods, was adopted around the same time. Kumeyaay potters made simple brownware coil-built ollas and cooking jars—the region's first durable ceramic containers (Griset 1996: 85-86). Shards of this pottery are found at Late Prehistoric sites along the San Dieguito and San Diego Rivers, often soot-blackened from use in hearths (Griset 1996: 71).

Another key change was in the weaponry: archery equipment replaced the atlatl. Small, finely flaked arrow points (typically Desert Side-notched and Cottonwood Triangular types) occur in large numbers in Late Prehistoric sites (Yohe 1992: 67; Warren et al. 2008: 85). These diminutive points, often made of obsidian or local volcanic rock, are the tips of arrows propelled by bows, an advantage in hunting accuracy and lethality that likely contributed to increased efficiency in taking game. The presence of obsidian arrow points at Del Mar sites also reflects long-distance exchange, as obsidian was procured from eastern California or Arizona and traded into coastal San Diego (Carrico 1997; Warren et al. 2008). Shell and bone working expanded in this period. Kumeyaay craftworkers manufactured Olivella shell beads in large quantities for ornament and exchange. Late Prehistoric coastal sites often contain debris from shell bead production, such as roughouts and marine shell detritus (McDonald and Eighmey 2008). They also carved bone tools like awls (for basketry and leatherworking) and lateral fishhooks from shell or bone that improved fishing capabilities (Rogers 1945; Moriarty 1968). Artifacts of ritual significance in the Late Prehistoric include zoomorphic carvings and pictographs or painted rock art that suggests the development of a richer symbolic material culture by the protohistoric period (Hedges 1975). In sum, Late Prehistoric material culture shows an accumulation of new tool types geared towards an increasingly sedentary, resource-intensifying way of life—the culmination of a long cultural evolution in the region.

Subsistence in the Late Prehistoric times saw the introduction of new cultigens and practices. The Kumeyaay ancestors of this period maintained the rich coastal-inland seasonal round but with greater emphasis on acorn harvesting and small game hunting. Acorns from coast live oak and other oaks became a calorie staple after about AD 800, once pottery and granular milling tools made intensive processing feasible (Glassow 1996; True 1970: 41). Each fall, extended family groups would collect acorns in quantity, transport them to base camps, and then process them by shelling, pounding, water-leaching (to remove tannins), and cooking the acorn meal into a mush or bread (Luomala 1978). This labor- and technology-

intensive use of acorns—"one of the hallmarks of the Late Prehistoric period"—provided a reliable, storable food source that could sustain larger populations through droughts (Christenson 1990: 73).

Alongside acorn exploitation, Late Prehistoric Kumeyaay subsistence continued to incorporate coastal resources. Shellfish gathering and fishing remained important in coastal villages (though some lagoon shellfish beds had declined by then due to siltation). Indeed, Spanish observers in 1769 noted native people near Del Mar "living on fish and mollusks collected from the shore" (Fages 1937: 33). However, compared to earlier periods, many Late Prehistoric villages were situated slightly inland, which correlates with faunal data showing increased take of terrestrial game. Artifacts and animal bones indicate that deer hunting took on greater significance, facilitated by the bow and arrow, which allowed stealthier and more effective kills of larger game (Koerper et al. 2002; Laylander 2011). Rabbit drives and the use of snares or nets to capture jackrabbits and cottontails also intensified, providing both meat and pelts (Christenson 1990). The presence of more obsidian points and other exotics in this period implies participation in inter-village trade networks, which likely buffered food shortages by moving surpluses of fish, shellfish, or acorns between coastal and inland groups (Carrico 1997).

Ethnohistoric accounts confirm that Late Prehistoric Kumeyaay near the San Dieguito River practiced a transhumant pattern, moving seasonally: spending winters near the coast for marine foraging and moving inland to higher elevations in autumn for acorn harvest (Luomala 1978). By maximizing diverse ecological zones, they enjoyed a balanced diet—acorn mush and seed gruels for carbohydrates, fish, shellfish, and game for protein, and fruits and greens (Hedges 1986; Shipek 1991). In summary, the Late Prehistoric subsistence strategy in the Del Mar area was one of intensification and diversification. Kumeyaay foragers became master resource managers, exploiting nearly every edible resource available—from shoals of migratory fish and acres of estuarine shellfish, to vast caches of acorns in mountain oak groves—thereby ensuring food security in the face of environmental uncertainties (Bean and Shipek 1978). This resilient economic base impressed the first Europeans with its efficiency and abundance, and it sustained the native populace up to the historic disruption of Spanish colonization.

3.3.4 Ethnohistoric Period (Spanish Contact era, 1769–ca. 1850)

European contact in the Del Mar area began in 1769 with the Portolá expedition—the first Spanish land expedition through San Diego County. Although Portolá's journal does not mention a camp at Del Mar, the route likely crossed the San Dieguito River inland of the lagoon. That same year, Mission San Diego de Alcalá was founded, followed by Mission San Luis Rey in 1798. These missions initiated profound changes as Kumeyaay communities were drawn into mission life; some individuals who frequented Del Mar were likely baptized and relocated to Mission San Diego in the late 1700s, while others resisted or fled to remote areas.

By the mission period (1770s–1830s), traditional Kumeyaay lifeways in coastal zones were severely disrupted. By about 1820, few—if any—native families remained permanently at places like San Dieguito Lagoon, as missionization and introduced diseases caused dramatic population declines (Shipek 1982). Nevertheless, cultural practices did not vanish overnight; some Kumeyaay continued clandestine use of ancestral lands or maintained seasonal camps beyond Spanish oversight. Resistance was significant, exemplified by the 1775 pan-Kumeyaay rebellion that destroyed Mission San Diego (Shipek 1991). During this era, Del Mar's coastal lands likely saw only transient use by displaced Kumeyaay or mission neophytes tending livestock. Archaeologically, the period is sometimes indicated by glass trade beads, metal tools, or European ceramics in otherwise native contexts. To date, no site in Del Mar has been conclusively

identified as an ethnohistoric ranchería, consistent with historical accounts of indigenous displacement and integration into ranch labor by the 1830s.

Ethnographic records and oral traditions provide insight into Kumeyaay lifeways before and during early historic times. The Kumeyaay (Tipai-Ipai or Diegueño) are Yuman-speaking people whose territory includes present-day San Diego and western Baja California (Luomala 1978; Shipek 1982). Social organization centered on autonomous bands or clans, each with a hereditary leader (kwaaypaay) and ceremonial specialists (kuseyaay). Villages typically consisted of seasonal or semi-permanent clusters of willow-framed thatched huts (e'waa).

In coastal and lowland areas, Kumeyaay followed a seasonal round strategy. During cooler months, many groups moved toward the coast and river valleys, exploiting resources such as shellfish, fish, waterfowl, and plant greens. In summer and early fall, they traveled inland to harvest acorns—a staple requiring labor-intensive processing—and gathered pinyon nuts, agave, yucca, chia seeds, and berries, and hunted game (Hoffman 1986; Luomala 1978). While some coastal villages may have been occupied year-round, Del Mar was likely used seasonally by bands whose main villages were inland along the San Dieguito River or higher ground to the east.

Kumeyaay spiritual life was deeply tied to the landscape. Oral traditions recount the creation of specific landforms, and rituals often centered on natural features. Places in Del Mar—such as distinctive rock formations, the lagoon, or coastal sage scrub habitats—may have held cultural significance. Plants like white sage and jimsonweed were used ceremonially, and locations where these grew well might have been revisited for ritual harvesting. Songs and stories in Kumeyaay oral literature map onto real geography; one legend speaks of a giant who lived on the coast and threw rocks into the sea, forming offshore islands. Although no specific Kumeyaay lore about Del Mar is recorded, modern tribal representatives emphasize that the entire coastal area is part of their heritage landscape.

Today, Kumeyaay descendants belong to several federally recognized tribes in San Diego County, including San Pasqual, Jamul, Sycuan, Barona, Viejas, and Campo. Although Del Mar lies outside reservation boundaries, it remains within ancestral lands considered culturally important. Cultural resource management in Del Mar often involves collaboration with Kumeyaay monitors to protect inadvertent discoveries. City policies (CEQA Supplemental Regulations; City of Del Mar 2020) and state law (PRC §5097.98) ensure tribal input in the treatment of cultural materials. While no specific sacred site in Del Mar is documented in the NAHC Sacred Lands File, the area is treated as culturally sensitive out of respect for tribal perspectives. The Kumeyaay legacy in Del Mar is not confined to archaeology—it is a living heritage that underscores the need for careful planning and mitigation to avoid impacts to sites or resources integral to that heritage.

3.4 Historic Period Context (1769–Present)

The post-contact historical development of Del Mar, California, reflects a layered and dynamic transformation of the coastal landscape from Indigenous stewardship to Spanish colonial frontier, Mexican ranching territory, and ultimately American resort and residential enclave. This synthesis traces the evolution of Del Mar through distinct historical phases—Spanish Colonial (1769–1821), Mexican Rancho (1821–1848), Early American Settlement (1849–1910), Early Twentieth Century Development (1910–1945), Post World War II Development (1946–1980), and Contemporary Del Mar (1981–2025). Drawing

on both primary and secondary archival sources, this context emphasizes the cultural, political, and economic forces that shaped Del Mar's identity and built environment.

3.4.1 Spanish Colonial Period (1769–1821)

The Spanish occupied the area now known as San Diego County between 1769 and 1820 (RECON Environmental, Inc. 2020:7). In 1769, Father Junipero Serra established the first California mission, Mission San Diego de Alcalá, and Governor Don Gaspar de Portolá proclaimed California part of New Spain. This was the founding of Presidio San Diego, the first permanent European settlement on the Pacific Coast. Presidio San Diego was the operations center for expeditions into California to establish missions and presidios for the Spanish crown (Landmark Review Project 1978). Missions served as population centers and early towns in colonial California. Cattle freely roamed and grazed impacting traditional Native American subsistence agriculture (RECON Environmental, Inc. 2020:7). By 1819, 90 soldiers were stationed at the Presidio of San Diego where 450 Spanish and 5,200 Native Americans resided (Landmark Review Project 1978).

3.4.2 Mexican Rancho Period (1821–1848)

Mexico gained independence from Spain in 1821 and took control of California. Missions remained in operation under Mexican rule (AECOM 2017:17). By 1830, 120 soldiers were stationed at the Presidio of San Diego protecting 520 Mexican citizens and 5,200 "Christian Indians"; the force declined to 27 soldiers in 1835 (Landmark Review Project 1978).

From 1834 to 1936, the missions in California were secularized. Previous religious land holdings were made available to private citizens for purchase. This change in land rights spurred the creation of the Rancho Era (AECOM 2017:17-18). Ranchos often were gifted to retired soldiers and as political favors (Christenson and Sweet 2008:85).

Del Mar was part of Rancho San Dieguito, an 8,824.71-acre parcel that was granted to Don Juan Maria Osuna circa 1840 by Governor Juan Alvarado (Del Mar Union School District, n.d.-a; Christenson and Sweet 2008:85; Del Castillo 2007:33). Osuna's father, Juan Ismerio Osuna, had been part of the 1769 expedition that founded Presidio San Diego and Mission San Diego de Alcalá. Juan Maria Osuna served as the first mayor of San Diego when the development reached pueblo status in 1835 (Christenson and Sweet 2008:85). Provisional ownership of Rancho San Dieguito included Juan Maria Canedo in 1828 and the Silvas family in 1831 (Christenson and Sweet 2008:85). Osuna was settled in the area in 1928. Native American mission neophytes complained that Osuna had seized all of the best land in the area by 1839 (Christenson and Sweet 2008:85). During this period, Native Americans who had worked for the mission worked for ranchos (AECOM 2017:17). The predominant industry in the area was cattle ranching. Transportation routes were developed to aid in the trade of hides and tallow (AECOM 2017:19).

3.4.3 Early American Settlement (1849–1910)

The Treaty of Guadalupe Hidalgo was signed in 1848 ceding 55 percent of Mexico's territory to the United States at the conclusion of the Mexican American War, including California (RECON Environmental, Inc. 2020:7; National Archives, n.d.-a). Mexican land rights on what was now American soil were called into question. Many rancho owners were unable to substantiate their land claims to the State Lands Commission. This resulted in the seizing of ranchos that were then made available for American settlement (AECOM 2017:19).

The period of the sale of rancho land coincided with three major events: the 1848 California Gold Rush, the conclusion of the Civil War in 1865, and the passage of the 1862 Homestead Act. Gold was discovered in California in 1948 on the South Fork of the American River. Between 1849 and 1954, an estimated 140,000 emigrants came to California in search of gold (National Park Service, n.d.). The Civil War sparked a period of mass migration within and to the United States (Library of Congress, n.d.). The Homestead Act of 1862 allowed Americans to claim 160 acres of surveyed public land for a nominal fee in return for living on and improving their plot (National Archives, n.d.-b). The Homestead Act was a legislative expression of Manifest Destiny, the concept that Americans were preordained to expand westward and occupy land (Office of the Historian, n.d.). The occurrence of these three events facilitated the development of California by Americans.

The population of San Diego was 500 in 1850 and 731 by 1860. The population underwent a 214 percent increase between 1860 and 1870, growing to 2,300 (Moffatt 1996:54). San Diego was a rural community between 1870 and 1930. Residents constructed scattered farmsteads and shared a school, church, post office, and general store (RECON Environmental, Inc. 2020:7). Typical agriculture included orchards, dairies, ranching, and dry farming—farming without external irrigation (AECOM 2017:19; Oregon State University 2014).

The California Southern/Southern Pacific Railroad began operating in 1882, passing through present-day Del Mar (ASM Affiliates, Inc. 2002:6). William S. Weed ran a ranch that housed the community post office until 1884 (City of Del Mar 1976). The area was known as “Weed” in his honor until 1885 (Del Mar Union School District n.d.-a).

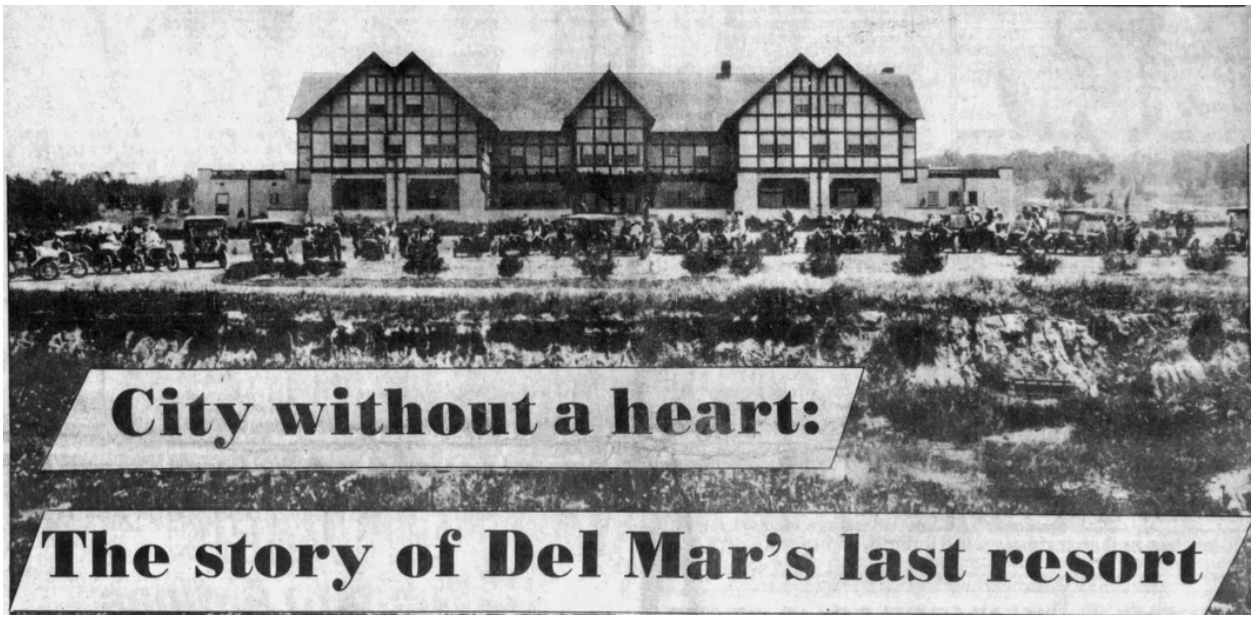
European settlement in Del Mar started in 1882 by Theodore M. Loop, an engineer and contractor on the Southern Pacific Railroad. Loop purchased land on the north side of Los Peñasquitos Lagoon and constructed a residence. He described the area as “the most attractive place on the entire coast” (AECOM 2017:20). Loop also constructed a tent city on the nearby beach. The name Del Mar comes from the poem “The Fight on Paseo Del Mar.” Loop and “Colonel” Jacob Taylor purchased 338.11 acres in present-day Del Mar from Enoch Talbert later that year for $1,000, predicting the potential for a seaside resort (AECOM 2017:20). Taylor had purchased Los Peñasquitos Ranch sight unseen in 1882 and immediately began acquiring land in the Del Mar area (Crawford 2004:4). Taylor and his brother platted Del Mar on either side of the existing California Southern Railroad line (ASM Affiliates, Inc. 2002:7). The duo hoped to attract the wealthy to the area and constructed Casa del Mar, a hotel. Attractions at the hotel included a dance pavilion, bathing pool extending to the ocean, a 110-step flight of stairs down to the beach, and a train station (City of Del Mar 1976; AECOM 2017:20). A general store was opened in Del Mar by Henry John and Mary Gottesburen in 1884 on 9th Street (Del Mar Historical Society, n.d.). Casa Del Mar burned down in 1889. Attempts to reconstruct the facility failed after the construction of a 4-foot concrete foundation (City of Del Mar 1976).

3.4.4 Early Twentieth Century Development (1910–1945)

Following the loss of Casa Del Mar in 1889, major development in the area ceased until the twentieth century. The South Coast Land Company was formed in 1905 to develop San Diego County (AECOM 2017:20; Crawford 2004:4). The group was composed of Los Angeles millionaires Wiliam G. Kerckhoff, Henry W. Keller, Henry E. Huntington, Charles A. Canfield, and Ed Fletcher. Fletcher later developed the water system in San Diego County (ASM Affiliates, Inc. 2002:7). Their plans included damming the San Luis Rey and San Dieguito Rivers to create hydroelectric power and provide water to coastal San Diego, to foster

agricultural and residential development, and to build an electric railway between Santa Ana and San Diego, an approximately 90-mile distance, as part of the Southern Pacific Railway System (ASM Affiliates, Inc. 2002:8). To institute these plans, an electric railroad line was planned and designed between Del Mar and San Diego; however, the plans were abandoned when the Southern Pacific Railway was purchased by Pacific Electric in 1909 (ASM Affiliates, Inc. 2002:8). By 1907, the group had acquired "all of Del Mar, South Oceanside, a portion of Oceanside located on the coast, all of Carlsbad, on the water front [sic], and Leucadia" (*Weekly Times-Advocate* 1907). The 1904 *Southern California Sheet No. 2, CA* map depicts Del Mar, labeled as Delmar, with few roads. The majority of development is located directly east of the shore with a small rectilinear grid present (US Geological Survey 1904).

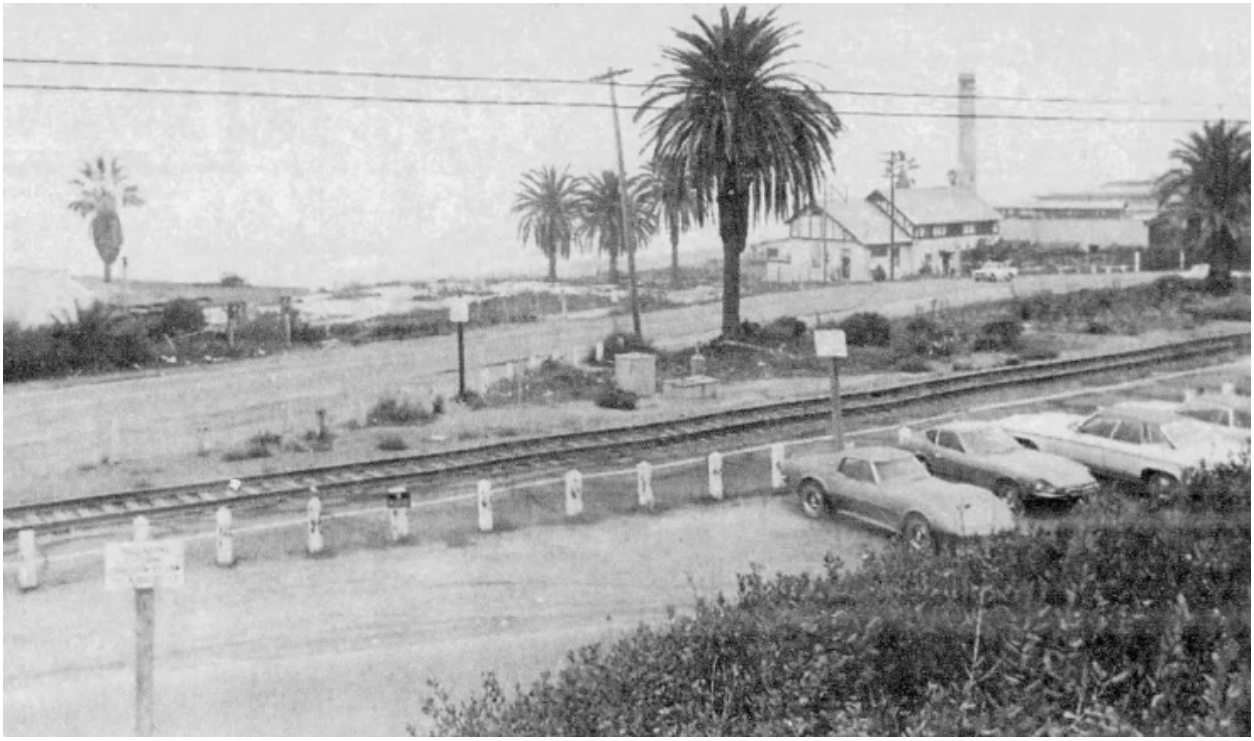
The Stratford Inn opened in 1909 and was constructed by the South Coast Land Company (see Photograph 1) (AECOM 2017:20). The hotel was designed by Los Angeles architect John C. Austin and was located at the corner of 15th Street and Grand Avenue (Del Mar Historical Society, n.d.). Austin was notable for his work on the Shrine Auditorium, Griffith Park Planetarium, and Los Angeles City Hall. The hotel attracted wealthy and famous individuals and included amenities such as a golf course, a plunge (a saltwater bath house), a pier, and a powerhouse (City of Del Mar 1976). The estimated cost of construction was $75,000 (*Citizen* 1988). Upon opening, rooms with a bathroom cost $4 per night; rooms without a bathroom cost $1 per night (*North County Blade-Citizen* 1989). The *San Diego Sun* described the inn as "more than a hotel; it's an institution" and having an "Elizabethan type of architecture" (*The San Diego Sun* 1922). In 1925, it was reported that William Randolph Hearst and an accompanying party of 14 stayed at the inn, and an addition to double guest capacity was announced (*Coast Dispatch* 1925). Two guest houses to accommodate overflow guests were planned in 1926 (*Coast Dispatch* 1926). The name of the hotel was changed to Hotel Del Mar in the same year (*Daily Times-Advocate* 1926).



PHOTOGRAPH 1: THE STRATFORD INN PICTURED ON ITS OPENING DAY IN 1909 AS FEATURED IN A 1983 ARTICLE (CITIZEN 1983)

The original powerhouse for the hotel was constructed by Del Mar Light, Water and Power, a subsidiary of Kerckhoff Company, which was owned by William G. Kerckhoff around the time of the opening of the Stratford Inn (*North County Blade-Citizen* 1992). A new powerhouse for the hotel was constructed in 1928

and is now known as the Powerhouse Community Center. The powerhouse provided hot water for the hotel, hotel pool, and laundry facilities. The system utilized a "state-of-the-art low-pressure steam-generating boiler system" with a 60-foot smokestack measuring 7 feet in diameter at its base with 2-foot-thick walls (*North County Blade-Citizen* 1992). The powerhouse was converted into a nightclub called "Roaring '20s" in 1958, which closed in 1962 (*North County Blade-Citizen* 1992; City of Del Mar, n.d.-b). The building was converted into a desalination plant by the Universal Water Corporation in 1965. The property and surrounding area were purchased by the City in 1983 to expand Seagrove Park (see Photograph 3) (*North County Blade-Citizen* 1992; City of Del Mar, n.d.-b). A community center opened in the powerplant in 2000 (City of Del Mar, n.d.-b).



PHOTOGRAPH 2: THE STRATFORD INN POWERHOUSE IN 1992 (NORTH COUNTY BLADE-CITIZEN 1992)

Charles A. Canfield, an oil magnate and founding member of the South Coast Land Company, constructed the Canfield-Wright House in Del Mar in 1910. The architect of the Canfield-Wright House, John C. Austin, utilized the Mission Revival style. Canfield was the first to drill an oil well in Los Angeles and Mexico. Canfield and his partner, Edward L. Doheny, paved the streets of Mexico City with asphalt, a biproduct of the oil production. Canfield and Henry E. Huntington were significantly involved in the development of Beverly Hills and the Beverly Hills Hotel.

Construction of the hotel set off a land boom in Del Mar (City of Del Mar 1976). Large residences were constructed following its inception (AECOM 2017:20; Del Mar Historical Society, n.d.). Property sales of over $500,000 were recorded within a few months of the completion of the Stratford Inn (City of Del Mar 1976). The South Coast Land Company oversaw the development of Del Mar. At this time, the Del Mar sewer system was created, the San Dieguito slough was filled in to create Coast Boulevard, and a golf course was developed (City of Del Mar 1976). The South Coast Land Company created roads that were meant to wind and meander. Lots were subdivided into irregular parcels to maintain individuality and emphasize views of natural scenery. Architects were encouraged to design residences in compatibility with

the style of the Stratford Inn: English Cottage and Shingled Bungalow (City of Del Mar 1976). According to the South Coast Land Company, the development was "of distinctive class … free from the noise, confusion and ugly cheap details of the average beach resort … Building restrictions will be enforced and everything will be done to make Del Mar what nature designed it to be, the most beautiful and pleasing place on the Pacific" (City of Del Mar 1976). The company created design guidelines for its development that included bans on construction other than single-family residences, bans on non-white residents, 25-foot setbacks, and limits on outbuildings. These restrictions were terminated in 1935 (City of Del Mar 1976).

The South Coast Land Company and E. W. Scripps developed a road from Del Mar to La Jolla. The road was the only path for cars between Del Mar and San Diego until the construction of Highway 101 in 1931 (City of Del Mar 1976).

Development slowed during the Great Depression until later in the 1930s. The Del Mar Civic Association was founded in 1931 (Del Mar Historical Society, n.d.). The San Dieguito Valley was considered and selected as the site of the San Diego County Fair in the early 1930s. The site of the fair was 184 acres, favored for accessibility. The project was funded by a grant from the Works Progress Administration to the 22nd Agricultural District Association, which purchased the land with a $25,000 grant from the State Department of Fairs and Expositions (City of Del Mar 1976; Del Mar Union School District, n.d.-a). The first San Diego County Fair opened in 1936, and an estimated 50,000 people attended (AECOM 2017:20). Attendance grew to 610,000 individuals in 1974 (City of Del Mar 1976).

The Del Mar Turf Club, a horse racing track, opened next to the fairgrounds in 1937. Founded by Bing Crosby, the racetrack was a popular haunt for celebrities including Lucy and Desi Arnaz, Burt Bacharach, and Pat O'Brien (AECOM 2017:20). Bing Crosby recorded the song *Where the Turf Meets the Surf* to be played at the beginning and conclusion of each day in 1938 (AECOM 2017:20). In 1937, the annual race schedule totaled 43 days with 630,000 attendees (City of Del Mar 1976). A 1938 advertisement for the track dubbed Del Mar "The Vacation Spot of the Nation" (*The San Diego Sun* 1938). It was reported that the Del Mar Turf Club added $475,000 to the San Diego County economy in 1940 (*Coast Dispatch* 1940).

The club and fairgrounds were closed during World War II, and the area was utilized for U.S. military efforts. Marines and paratroopers built living quarters on the site. A Navy air facility and landing field were built at the San Dieguito Lagoon. Between 1943 and 1944, the area was utilized for the manufacturing of B-17 "Flying Fortress" bomber parts (AECOM 2017:22). The Del Mar Turf Club Aviation Plant employed 300 workers and was the only horse track utilized as part of wartime manufacturing (*Daily Times-Advocate* 1944). Following the conclusion of the war, the use of the county fairgrounds and racetrack returned to their original purposes (AECOM 2017:22).

3.4.5 Post-World War II Development (1946–1980)

Post-World War II development of Del Mar and surrounding beach communities increased to accommodate commuters to San Diego. Between 1938 and 1958, the population of Del Mar increased from 430 to 2,800 (City of Del Mar 1976). Del Mar was incorporated as a city in 1959 following a discussion of annexation to San Diego to protect the City's autonomy (*Coast Dispatch* 1958; AECOM 2017:22). Aerial photographs depict an increase in development, particularly along Camino del Mar between 1953 and 1964 (NETR 2025: 1953, 1964). The University of California, San Diego opened in nearby La Jolla in the 1960s (AECOM 2017:22). The City of San Diego again considered the annexation of Del Mar in 1962 to bring additional water to San Diego; however, the plan failed (*Coast Dispatch* 1962).

Interstate 5 opened inland, bypassing Del Mar in 1966, following protests of a proposed route along the ocean bluffs in the City (City of Del Mar 1976). Construction of the roadway alleviated traffic along Camino del Mar, which initially negatively affected the business district, but the district stabilized in the 1970s (City of Del Mar 1976). The Stratford Inn closed in 1963 and was demolished in 1969. The Inn at Del Mar was constructed on the site (*Citizen* 1989). Seagrove Park opened in the 1980s (Del Mar Historical Society, n.d.). The population of Del Mar reached its zenith in 1980 at 5,017 residents (United States Census Bureau 1982).

3.4.6 Contemporary Del Mar (1981–2025)

The population of Del Mar was 3,954 as of 2020 with a population density of 2,302.9 individuals per square mile. The population included 1,932 households with an average household size of 2.05. The median income was $192,845 with 2.5 percent of the population living below the poverty line (United States Census Bureau, n.d.). Del Mar's Civic Center was dedicated in 2018 and designed by Miller Hull (Miller Hull, n.d.). The curvilinear, meandering streets established by the South Coast Land Company are still present east of Camino del Mar where significant residential development is located. The Del Mar Union School District includes nine schools for 3,363 kindergarten through sixth grade students (Del Mar Union School District, n.d.-b).

4.0 RESOURCE IDENTIFICATION METHODS AND RESULTS

This program-level study was conducted primarily through desktop research and spatial analysis, given that project-specific design details are not fully developed for most CIP projects.

4.1 Cultural Resources

4.1.1 South Coastal Information Center Records Search

Michael Baker International (Michael Baker) sent a records search request on August 29, 2025, to the South Coastal Information Center (SCIC) of the California Historical Resources Information System and received a response on October 1, 2025. The records search returned 67 cultural resource studies within the City of Del Mar. All identified cultural resource studies intersect the project site (**Table 2**). The records search also identified 37 previously recorded cultural resources within the City. **Table 3** provides a summary of these resources. **Confidential Appendix A** provides the results of the records search, including the DPR site record forms. Copies of the previous reports may be provided upon request.

TABLE 2: PREVIOUS STUDIES WITHIN THE PROJECT SITE

Report Number	Author	Date	Title	Publisher
SD-00182	Barter, Eloise Richards	1986	Torrey Pines State Reserves Resource Management Plan	California State Archaeologist
SD-00672	Gallegos, Dennis, Roxana Phillips, and Andrew Pigniolo	1988	A Cultural Resource Overview for the San Dieguito River Valley San Diego, California.	Westec Services, Inc.
SD-01851	Hector, Susan	1989	Cultural Resources Survey of the San Diego Commuter Rail Project	Recon
SD-02958	Caltrans	1994	Negative Archaeological Survey Report 11-SD-5, P.M. R35.2, 189161	Caltrans
SD-03139	Shultz, Richard	1995	Archaeological Resource Inventory for Nogales Drive Property Del Mar San Diego California	Affinis
SD-03549	Kirkish, Alex N. and Brian F. Smith	1997	Results of a Data Recover Program at Site SDI-7979, The Whittier-Del Mar Project at Border Avenue Del Mar, California	City of Del Mar Planning Department
SD-04177	Berryman, Judy Ph.D. and Craig Woodman, M.A.	2000	Archaeological Investigations for the San Dieguito Wetland Restoration Project EIR/EIS	Science Application International Corporation
SD-04207	Westec	1977	Archaeological/Historical Survey of the Stratford Inn Garage.	Westec
SD-04236	APEC (American Pacific Environmental Consultants, INC.)	1981	Environmental Impact Report for San Dieguito River Study Draft Conceptual Master Plan	Apec
SD-04398	Kyle, Carolyn	1995	North Torrey Pines Bridge Over Los Peñasquitos Creek	Gallegos & Associates
SD-04658	City of San Diego	2002	Proposed Mitigated Negative Declaration: Formation of Underground Utility Districts	City of San Diego

TABLE 2, CONTINUED

Report Number	Author	Date	Title	Publisher
SD-04752	Thesken, Jay	1985	Archaeological Survey and Evaluation of the Torre Sands Property	Westec
SD-04810	Rosen, Martin	1999	Historic Property Survey Report for the Seismic Retrofit of the North Torrey Pines Road Bridge	Rosen, Martin
SD-04813	Mealey, Marla	1997	Statewide Resource Management Program Project Status Report: Archaeological Site Reevaluation and Mapping at Torrey Pines State	Department of Parks and Recreation
SD-05593	Caltrans	1995	Historic Property Report: Negative Declaration for North Torrey Pines Bridge	Caltrans
SD-06440	Berryman, Judy and Craig Woodman	1999	Draft Archaeological Investigations for the San Dieguito Wetlands Restoration Project EIR/EIS	Science Application International Corp.
SD-06444	U.S. Fish & Wildlife Service and Sand Dieguito River Park Joint Authority	2000	Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the San Dieguito Wetlands Restoration Project	U.S. Fish & Wildlife
SD-06629	Rosen, Martin	1999	Historic Property Survey Report Oceanside to San Diego-Rail to Trail	Martin Rosen
SD-06638	Rosen, Martin	1995	Historic Property Survey Negative Findings North Torrey Pines Bridge	Martin Rosen
SD-06645	Rosen, Martin	1994	Negative Archaeological Survey Grand Avenue & Old Del Mar Airport	Martin Rosen
SD-06736	Wade, Sue	1997	Archaeological Survey: Stratford Court Property	Cultural Resource Management
SD-06931	City of San Diego	1999	Notice of Preparation of a Draft EIR Carmel Valley Road Enhancement Project	City of San Diego
SD-07842	Nighabhlain, Sinead	2002	Significance Evaluation of the Del Mar Bluffs Spillway (P-37-024195)	ASM Affiliates
SD-08534	Smith, Brian F.	1989	Results of an Archaeological Data Recovery Program at Sites CA-SDI-4618A, CA-SDI-4619, and CA-SDI-10915	Brian F. Smith and Associates
SD-09145	Gallegos, Dennis and Carolyn Kyle	1991	Cultural Resource Survey Report San Diego Bikeways Project San Diego, California	Gallegos and Associates
SD-09329	--	2004	EIR For the Gad and Schroeder Residences Project	PBS&J
SD-09331	Crawford, Kathleen	2004	Historical Assessment of the Residence at 351 13th Street	Kathleen Crawford/ Marie Burke Lia
SD-09361	Byrd, Brian F. and Collin O'Neill	2002	Archaeological Survey Report for the Phase I Archaeological Survey along Interstate 5 San Diego County, CA.	ASM, Inc
SD-09516	Caterino, David	2005	The Cemeteries and Gravestones of San Diego County: An Archaeological Study	David Caterino
SD-09518	Mealey, Marla	2005	Archaeological Site Condition Assessment within Torrey Pines State Reserve for Storm Damage following the 2004/2005 Rainfall Season	California State Parks
SD-10415	Fulton, Phil	2006	Cultural Resources Assessment Del Mar Fairgrounds Project Cities of Del Mar and San Diego, San Diego County, California	LSA Associates, Inc.

TABLE 2, CONTINUED

Report Number	Author	Date	Title	Publisher
SD-10433	Braciszewski, Bruce and Bob Nelson	1980	National Register of Historic Places Inventory Nomination Form for the Site of the Del Mar Man/Del Mar North Bluffs Preserve	City of Del Mar
SD-10550	May, Vonn Marie	2002b	National Register of Historic Places Registration Form for the Canfield-Wright House	Vonn Marie May, Cultural Resource Planner
SD-10610	Braciszewski, Bruce and Bob Nelson	1980	National Register of Historic Places Inventory-Nomination Form for the Del Mar North Bluffs Preserve, The Site of Del Mar Man	Park and Recreation Committee and City Manager
SD-10885	Mattingly, Scott A.	2007	Archaeological and Geospatial Investigations of Fire-Altered Rock Features at Torrey Pines State Reserve, San Diego, California	Scott A. Mattingly
SD-11623	Hector, Susan M. and Alice Brewster	2002	San Dieguito River Valley Inventory of Archaeological Resources	ASM Affiliates
SD-11819	Rosen, Martin D.	2008	First Supplemental Historic Property Survey Report for the Seismic Retrofit and Rehabilitation of the North Torrey Pines Road Bridge (Sorrento Overhead), Bridge No. 57C-0207, EA 965100-3ENVR	Caltrans
SD-12117	Zepeda-Herman, Carmen and Harry Price	2009	Results of the Archaeological Monitoring Program for the San Dieguito Wetlands Restoration Project, San Diego County, California	Recon Environmental Inc.
SD-12236	Gardner, Jill	2009	Cultural Resources Survey for the SDG&E CMP 12-Pole Replacement Project in Escondido, San Diego County, California	ASM Affiliates
SD-12273	Gross, Tomothy G.	2004	Cultural Resource Evaluation of the Riverpark Office Project, City of Del Mar, California	Affinis
SD-14049	Ni Ghabhlain, Sinead	2011	Cultural Resource Survey Update Bridge 243.0 Revetment Project, Del Mar, California	ASM Affiliates, Inc.
SD-14086	Pham, Angela N. and Sinead Ni Ghabhlain	2012	Cultural and Historical Resources Constraints Report for the San Dieguito Bridge Replacement and Second Track Project; Del Mar Tunnel Alternatives Analysis	ASM Affiliates, Inc.
SD-14092	Ni Ghabhlain, Sinead, Sarah Stinger Bowsher, and James Daniels	2009	Cultural and Historical Resource Inventory and Evaluation Report for the San Dieguito River Bridge Replacement and Second Track Project, Del Mar, San Diego County, California	ASM Affiliates, Inc.
SD-14397	Pigniolo, Andrew R.	2010	Record Search Results for the Underground Utility District Via De La Valle Project	Laguna Mountain Environmental, Inc.
SD-14891	U.S. Department of Homeland Security	2013	FEMA HSGP: 2012-SS-00123 (16267) Del Mar City Hall	United States Department of Homeland Security
SD-15278	Courtney, Michelle G. and Brian F. Smith	2014	Mitigation Monitoring Report for The North Torrey Pines Bridge Project Del Mar, California	Brian F. Smith and Associates, Inc.
SD-15568	Bonner, Wayne H. and Kathleen A. Crawford	2013	Cultural Resources Records Search and Site Visit Results for T Mobile West, LLC Candidate SD06288A (Crest Way Water Tank) 14098 Crest Way, Del Mar, San Diego County, California	Environmental Assessment Specialists, Inc

TABLE 2, CONTINUED

Report Number	Author	Date	Title	Publisher
SD-15569	Bonner, William H. and Kathleen A. Crawford	2013	Direct APE Historic Architectural Assessment for T-Mobile West, LLC Candidate SD06288A (Crest Way Water Tank) 14098 Crest Way, Del Mar, San Diego County, California	Environmental Assessment Specialists, Inc
SD-16381	Brunzell, David and Brunzell, Kara	2015	Cultural Resources Assessment of the Del Mar Grandstands Project, Del Mar, San Diego County, California (BCR Consulting Project No. TRF1517)	BCR Consulting LLC
SD-16729	Villalobos, Mary M.	2015	ETS 31031 – Cultural Resources Monitoring for Pole Replacement P61716, Del Mar, North San Diego County, California - IO 7074264	ICF International
SD-16877	Wills, Carrie D. and Bruce, Bonnie	2016	Cultural Resource Records Search and Site Visit Results for Cellco Partnership and Their Controlled Affiliates Doing Business as Verizon Wireless Candidate 'Jimmy Durante' 2260 Jimmy Durante Boulevard, Del Mar, San Diego County, California	HELIX Environmental Planning
SD-16910	Ports, Kyle	2017	Letter Report: ETS 34638.01 - Cultural Resources Monitoring Report for Install 2040-4 PE Pipe Del Mar Fairgrounds, City of Del Mar, California - IO 7074263	AECOM
SD-17006	Cheever, Dayle M.	1995	Cultural Resource Significance Testing of CA-SDI-10,940 (SDM-W-34A); Whittier Property TPM 94-1	Recon
SD-17103	Foglia, Shannon E., Theodore G. Cooley, Monica Mello, Brian Spells, Rachel Droessler, Tim Wolfe, and Earl Morales	2017	Cultural Resources Survey Report for the Proposed San Diego Gas & Electric TL674A Reconfiguration & TL666D Removal Project, San Diego County, California	AECOM
SD-17135	Cordova, Isabel	2015	Archaeological Survey for Pole Brushing Project, Various Locations, San Diego County, California (SDG&E ETS# 29109, PanGIS Project# 1401.07)	PanGIS
SD-17966	Wills, Carrie D. and Bonnie Bruce	2017	Cultural Resources Records Search for Cellco Partnership and Their Controlled Affiliates Doing Business as Verizon Wireless Candidate 'Del Mar Race Track' 2260 Jimmy Durante Boulevard, Del Mar, San Diego County, California	Helix Environmental Planning, Inc.
SD-18366	Stropes, J.R.K. and Jillian L. Hahnlen	2019	Historic Structure Assessment for the 207 13TH Street Building, Del Mar, California, APN 300-074-11	Brian F. Smith and Associates, Inc.
SD-18757	Johnston, Rob'yn	2019	Letter Report: ETS 38299.01 - Cultural Resources Monitoring Report for Replace Pole, Cable, and Switch, P95709, City of Del Mar, California - IO 7074264	AECOM
SD-18861	Meling, Juliette	2020	Archaeological Survey Report for the Torrey Pines State Natural Reserve	California Department of Parks and Recreation
SD-19219	Mengers, Douglas	2021	Cultural Resources Survey for Del Mar Bluffs Stabilization Project 5, Del Mar, San Diego County, California	PanGIS, Inc.

TABLE 2, CONTINUED

Report Number	Author	Date	Title	Publisher
SD-19220	Mengers, Douglas	2020	NRHP/CRHR Evaluation of 4 Cultural Resources for the Del Mar Bluffs Stabilization Project 5, Del Mar, San Diego County, California	PanGIS, INC.
SD-19221	Mengers, Douglas	2018	Cultural Resources Survey for Del Mar Bluffs Stabilization Project 4, Del Mar, San Diego County, California	PanGIS, INC.
SD-19222	Mengers, Douglas	2018	Supplemental Cultural Resources Survey for Del Mar Bluffs Stabilization Project 4, Del Mar, San Diego County, California	PanGIS, INC.
SD-19570	Jordan, Amy	2021	Archaeological Monitoring for the GTS Steel Main 200' 2 PE and 3 Services, Pine Needles Drive, Del Mar Project (SDG&E ETS # 48744; ASM Project # 37001.12/48744)	ASM Affiliates, Inc.
SD-19598	Yerka, Nathanial	2020	Results of Historical Resources Survey for the La Atalaya Subdivision Project, Del Mar, California	Recon Environmental, Inc.
SD-19938	Moradi, Leah	2023	Letter Report: ETS 5981501 – Cultural Resources Monitoring for TCM Z12313 Anchor and Down Guys, Solana Beach, San Diego County, California	Aecom
SD-20288	Liss, Paige	2022	Archaeological Survey Report Carpobrotus Removal in TPSNR Extension	Department of Parks and Recreation

TABLE 3: PREVIOUSLY RECORDED RESOURCES WITHIN THE PROJECT SITE

Primary Number	Trinomial Number/Site Name	Attribute Code and Site Description	Recording Events (Recorder, Organization, Year)	NRHP/CRHR Evaluation Status
--	220 27th Street	Residence	--	--
P-37-000191	CA-SDI-000191	AP15: Habitation Debris; Prehistoric habitation site with cobble hearths, shell fragments, sandstone metates, and "worked stones" observed.	Malcolm Rogers, n.d.; Foglia & Spelts, AECOM, 2016; AECOM 2019; T. Wolfe, AECOM, 2020; J. Tansey, GeoPacific, 2021	Not formally evaluated; likely eligible
P-37-000192	CA-SDI-000192	AP15: Habitation Debris; unknown prehistoric site, shell scatter, likely destroyed by development	Treganza, Gross and Bull, n.d.; Foglia & Spelts, AECOM, 2016	Not formally evaluated
P-37-004612	CA-SDI-004612	Midden/Habitation Debris, Prehistoric site, cobbles, shell midden, eroding sandstone mortar	D. Colbern, 1973; J. Woodward, 1982; M. Mealey et al., 1996; N. Brodie, 2015; D. Mengers, PanGIS, 2018/2021	Not formally evaluated
P-37-007979	CA-SDI-007979	Midden/Habitation Debris, Lithic/Ceramic Scatter; moderately developed midden, ground stone tools, shellfish, lithics, mammal bone.	D. Barboela and D. Cheever 1980; B. Smith, Brian F. Smith & Associates, 1996	Underwent Data Recovery in 1996, likely remains an eligible resource

TABLE 3, CONTINUED

Primary Number	Trinomial Number/Site Name	Attribute Code and Site Description	Recording Events (Recorder, Organization, Year)	NRHP/CRHR Evaluation Status
P-37-010149	CA-SDI-010149	Shell, ash, flaked stone, quartzite and metavolcanic flakes; site covered by slope-washed sediment	Richard Carrico & Jay Thesken, WESTEC, 1984; N. Brodie, 2014	Not formally evaluated
P-37-010940	CA-SDI-010940	Burial, habitation site, cultures included LIT I & II, trace of Y-III; midden, scarce cobble hearths, burials, shell, bone, charcoal, metate, flakes, points, knives	Malcolm Rogers, n.d., Andrew Pigniolo, WESTEC, 1988	Not formally evaluated; likely eligible
P-37-017450	1638 Coast Blvd Powerhouse Building and Smokestack; Powerhouse	Historic structure, last of Old Hotel Del Mar complex; stucco and wood timbers, concrete	John B. Bahorski, City of Del Mar, 1988)	Considered a local landmark; appears eligible for NRHP
P-37-024194	DMB Feature 1	AH16: Railroad retaining wall, culvert, or drain; concrete storm pipe and retaining wall, collapsed and broken into chunks	Ní Ghabhláin and Pallette, ASM Affiliates, 2001; D. Mengers, PanGIS, 2018/2020/2021	Not eligible (FRA/SHPO 2021)
P-37-024195	DMB Feature 2	AH16: Railroad retaining wall, culvert, or drain; historic concrete retaining wall and spillway	Ní Ghabhláin and Pallette, ASM Affiliates 2001/2002, D. Mengers, PanGIS, 2018/2021	Not eligible (FRA/SHPO 2021)
P-37-024196	DMB Feature 3	AH16: Railroad retaining wall, culvert, or drain; 20 m concrete wall	Ní Ghabhláin and Pallette, ASM Affiliates, 2001; D. Mengers, PanGIS, 2021	Not eligible (FRA/SHPO 2021)
P-37-024197	DMB Feature 4	AH16: Historic foundation and bridge remains; 1910 gazebo/footbridge, wooden pilings of an1890s swimming pool	Ní Ghabhláin and Pallette, ASM Affiliates, 2001; D. Mengers, PanGIS, 2018/2021	Not eligible (FRA/SHPO 2021)
P-37-024198	DMB Feature 5	AH16: Railroad retaining wall, culvert, or drain; retaining wall and storm drain, mostly replaced	Ní Ghabhláin and Pallette, ASM Affiliates, 2001; D. Mengers, PanGIS, 2021	Not eligible (FRA/SHPO 2021)
P-37-024199	DMB Feature 6	AH16: Railroad retaining wall, culvert, or drain; collapsed historic wall	Ní Ghabhláin and Pallette, ASM Affiliates, 2001; D. Mengers, PanGIS, 2021	Not eligible (FRA/SHPO 2021)
P-37-024200	DMB Feature 8	AH16: Railroad retaining wall, culvert, or drain; historic concrete wall	Ní Ghabhláin and Pallette, ASM Affiliates, 2001; D. Mengers, PanGIS, 2021	Not eligible (FRA/SHPO 2021)
P-37-024201	DMB Feature 9	AH16: Railroad retaining wall, culvert, or drain; historic large retaining wall with culvert	Ní Ghabhláin and Pallette, ASM Affiliates, 2001; D. Mengers, PanGIS, 2021	Not eligible (FRA/SHPO 2021)

TABLE 3, CONTINUED

Primary Number	Trinomial Number/Site Name	Attribute Code and Site Description	Recording Events (Recorder, Organization, Year)	NRHP/CRHR Evaluation Status
P-37-024249	DMB Feature 7	AH16: Railroad retaining wall, culvert, or drain; concrete wall	Ní Ghabhláin and Pallette, ASM Affiliates, 2001; D. Mengers, PanGIS, 2021	Not eligible (FRA/SHPO 2021)
P-37-026493	CA-SDI-017389	Highland accretion midden on red crag formation, platforms, hearths, fire-cracked rock, shell	Rogers 1939	Not formally evaluated; site destroyed by erosion
P-37-033925	CA-SDI-021312	AH4: Trash scatter; domestic and automotive artifacts, historic refuse: bottles, cans, hubcaps; destroyed by bridge retrofit	Charles Callahan 2011; Smith et al., Brian F. Smith & Assoc., 2014; D. Mengers, PanGIS, 2018/2021	Not eligible (FRA/SHPO 2021)
P-37-034956	San Dieguito River Railroad Bridge	HP19: Railroad Bridge; timber pile trestle	Ní Ghabhláin et al., ASM Affiliates, 2009	Recommended not eligible
P-37-035160	T-Mobile West LLC SD06288A / Crest Way Water Tank	HP11: Engineering Structure; Modern round steel water tank, c.1953, public utility	K. A. Crawford, Crawford Historic Services, 2013	Recommended not eligible
P-37-035935	Del Mar Infield Pavilion	HP42: Contemporary building, irregular plan, brick and plywood, scoreboard	K. Brunzell, 2015	Recommended not eligible
P-37-035936	Del Mar Thoroughbred Club Grandstand and Racetrack Complex	HP4: Ancillary building, vernacular Modern style, built circa 1965	K. Brunzell, 2015; M. Mello, AECOM, 2016	Recommended not eligible
P-37-036273	A-S-1 (Sewer Tank)	HP39: Sewer Tank; Concrete tank with manhole "City of Del Mar Sewage 1936—Standard Iron Works"	Dina Chatelain et al., 2014	Not formally evaluated
P-37-036281	CA-SDI-021996 A-S-3 (Historic Trash Dump)	A4: Historic Trash Dump; Refuse scatter, bottles, ceramics, metal, 1929–1954	N. Turner, California State Parks, 2014	Not formally evaluated
P-37-036412	Del Mar-P62481-7 (1601 San Dieguito Dr)	HP2: Single-family property; Raised ranch-style residence, 1965	M. Mello, AECOM, 2016.	Recommended not eligible
P-37-036413	Del Mar-P62481-8 (1604 San Dieguito Dr)	HP2: Single-family property; Eclectic ranch-style residence, 1967	M. Mello, AECOM, 2016	Recommended not eligible
P-37-036415	Del Mar-TL666(Portion of TL666 within the Del Mar Project corridor)	HP11: Engineering Structure; SDG&E electric transmission line, c.1918	Foglia & Spelts, AECOM, 2016	Recommended not eligible
P-37-036420	CA-SDI-022048 Del Mar-Z90289-1 (Concrete Lamp Post Dump)	AH4: Privies/Dumps/Trash scatters; Dump of concrete blocks and pillars	Foglia & Spelts, AECOM, 2016	Not formally evaluated
P-37-036421	Del Mar-Z90296-1 (Glass Insulator Fragment)	AH16: Other; Clear glass insulator crown fragment, isolate	Foglia & Spelts, AECOM, 2016	Not formally evaluated

TABLE 3, CONTINUED

Primary Number	Trinomial Number/Site Name	Attribute Code and Site Description	Recording Events (Recorder, Organization, Year)	NRHP/CRHR Evaluation Status
P-37-036422	Del Mar-Z90297-1 (Del Mar Blue Print Co/Automotive)	HP8: Commercial Building; large rectangular corrugated metal warehouse, c.1955	Foglia et al., AECOM, 2016	Recommended not eligible
P-37-036423	Del Mar-Z90710-1 (Old Grand Avenue Bridge)	HP19: Bridge; WWII-era bridge, now overlook	Foglia & Spelts, AECOM, 2016	Recommended not eligible
P-37-036525	34638-ISO-1 (Historic Glass Bottle Isolate)	AH16: Other (Isolate); Clear glass bottle (fragmented from bobcat machine), c.1923-1982	K. Ports, AECOM, 2016	Not formally evaluated
P-37-039579	DMB5-02 (Signal Foundation)	AH2: Foundation; Concrete foundation for intermediate signal, pre-1970s	Mengers & Rolland, PanGIS, 2020	Not eligible for NRHP/CRHR (FRA/SHPO 2021)
P-37-039580	DMB5-03 (Drainage Chute)	HP20: Water conveyance system; Historic-era concrete drainage chute, c.1910	Mengers & Rolland, PanGIS, 2020	Not eligible for NRHP/CRHR (FRA/SHPO 2021)
P-37-039581	DMB5-04 (Pipe Outlet)	HP20: Water conveyance system; Historic-era iron pipe outlet, c.1910	Mengers & Rolland, PanGIS, 2020	Not eligible for NRHP/CRHR (FRA/SHPO 2021)
P-37-039582	DMB5-05 (Foundation)	AH2: Foundation; Historic-era concrete foundation, c.1910	Mengers & Rolland, PanGIS, 2020	Not eligible for NRHP/CRHR (FRA/SHPO 2021)

Precontact Archaeological Sites

CA-SDI-191 (SDM-W-37)

This site was first recorded by Malcolm Rogers as a prehistoric habitation on a sandy spit of land north of the San Dieguito River lagoon, with observations of cobble hearths, shell fragments, sandstone metates, and “worked stones” scattered on the surface. The site originally covered roughly 8 acres on a low terrace near today’s Via de la Valle and Jimmy Durante Boulevard (the area now occupied by a utility substation and parking). In Rogers’s time (ca. 1930s), it was an extensive shell midden likely dating to the Archaic (Encinitas/La Jolla) period. Later archaeologists revisited CA-SDI-191 and found it heavily disturbed. A 2016 survey noted only a sparse scatter of about 40 shell fragments (cockle, scallop, abalone) eroding from a landscaped slope at the base of the San Diego Gas & Electric (SDG&E) Del Mar Substation, with no intact deposits visible. In 2019 and 2021, monitoring of grading at the substation confirmed that most of the site’s archaeological strata had been removed or redeposited during past construction. Only a few residual marine shell pieces mixed with modern debris were observed in the fill soils, suggesting the site was largely destroyed when the substation was built in the 1950s. No features or artifacts were found in situ during recent work. In summary, CA-SDI-191 appears to have been a substantial shell midden (likely a Middle Holocene base camp) that yielded shell and groundstone indicative of a coastal Encinitas Tradition occupation, but decades of development have left it in a highly disturbed state with little to no intact deposit remaining.

CA-SDI-192 (SDM-W-56)

This was an "unknown prehistoric site" recorded by archaeologist Richard Treganza (ca. 1940s) on a narrow finger of land at the east side of the Del Mar Fairgrounds, near the margins of San Dieguito Lagoon. The original record did not describe any artifacts or features; it simply noted the location. A later visit by Gross and Bull (date unknown) likewise provided no detail other than the site's general position "east of the racetrack on a finger of land." In essence, CA-SDI-192 was known only by location, with no documented cultural materials. Modern investigations suggest that whatever deposit existed has since been obliterated. The area was graded and converted into a parking lot and access road for the fairgrounds in the mid-twentieth century, likely destroying the site. In 2016, AECOM archaeologist Ed Morales attempted to relocate CA-SDI-192 during a utility project survey; they found no in situ cultural remains. They only noted a few isolated shell fragments at a road shoulder, apparently washed downslope by rain, not part of an intact midden. No artifacts or soil discoloration were observed. Given the extensive development of the fairgrounds, it is concluded that CA-SDI-192 has been completely destroyed, with only scant secondary traces of shell indicating it ever existed. Thus, aside from its map coordinates and designation in old records, this site offers no meaningful data on Del Mar's prehistory.

CA-SDI-4612 (Torrey Pines State Beach Site #1, SDM-W-30)

Situated on the coastal bluff at the south end of Del Mar, just north of Torrey Pines State Beach, this was a small shell midden with a bedrock mortar reported in 1973 by D. Colbern. Colbern described "material eroding out of the cliff face"—specifically noting a portable sandstone mortar exposed in the sea cliff about 12 centimeters deep—and associated marine shell fragments (mussel, clam). In 1982, J. Woodward updated the record after a State Parks survey: he confirmed a coastal shell midden on a small sandstone terrace with cultural deposits about 30 centimeters thick, containing mussel shell and midden soil, though he could not relocate the previously noted mortar. By 1996, heavy erosion and construction had taken a toll. A State Parks archaeologist revisiting CA-SDI-4612 failed to find any shell or artifacts and surmised that the site had likely been destroyed during the construction of North Torrey Pines Road parking infrastructure (Mealey, Muranaka, and Heimgaertner 1997). Small-scale redeposited midden lenses might still exist in the inaccessible cliff face. In 2015, N. Brodie observed pockets of shell and some cobbles eroding from the cliff in this general vicinity and tentatively associated them with CA-SDI-4612 (Brodie 2015). However, subsequent systematic surveys for SANDAG's Del Mar Bluffs projects in 2018 and 2020 did not relocate any definable site deposit (Mengers 2018, 2021). Given these findings, CA-SDI-4612 is essentially extinct as an archaeological site—whatever midden existed has been eroded or buried by modern fill. It was likely a small Archaic shellfish processing station or camp on the bluff, but today only a few residual shell bits in the cliff hint at its presence (Colbern 1973; Mealey, Muranaka, and Heimgaertner 1997).

CA-SDI-7979 (Border Avenue Site)

Discovered in 1980 during a survey of undeveloped land in the northwest corner of Del Mar, CA-SDI-7979 was a moderately dense shell midden with lithic and ceramic scatter on a mesa top in Crest Canyon first recorded by Barbolla and Cheever in 1980. The site measured roughly 50 by 50 meters and lay about 0.5 kilometers northeast of the coast. Surface indicators included marine shell fragments (primarily Venus clam, scallop, oyster), a dark ashy soil, and artifacts such as grinding tool fragments and stone flakes. In 1995–1996, Biran F. Smith and Associates conducted a data recovery excavation at the site in advance of residential development (Kirkish and Smith 1997). Archaeologists excavated six 1×1 meter units, a trench,

and additional mechanical units, reaching a maximum depth of approximately 110 centimeters in cultural deposits. The excavations yielded a rich assemblage: over 1,500 artifacts (including quartzite and metavolcanic flake tools, choppers, scrapers, mano and metate fragments, and hammerstones), approximately 36 kilograms of marine shell, and faunal bone (small mammal and fish remains). Notably, no pottery or arrow points were found, indicating the site's primary occupation pre-dated AD 500. Radiocarbon dates on charcoal and shell placed the main midden formation in the Middle Holocene, ca. 7000–7500 years BP, corresponding to the La Jolla culture (Encinitas Tradition) period. Several discrete hearth features with charcoal and fire-cracked rock were documented, suggesting repeated campfires or roasting pits (Kirkish and Smith 1997). The lack of housepit features or cemeteries implied this was a seasonal resource-processing camp rather than a permanent village. The occupants likely collected shellfish from the nearby San Dieguito Lagoon and processed them on-site, as evidenced by dense shell dumps and groundstone for pounding or grinding shellfish and plant foods. The presence of Olivella shell beads in the midden also indicates early use of shell ornaments or trade items (Kirkish and Smith 1997). After excavation, the site was largely destroyed by construction of homes (the Whittier-Del Mar development). Today, CA-SDI-7979 survives only in the recovered collections and archives. It provided important data on early coastal subsistence (heavy reliance on estuarine shellfish, supplemented by land mammals and possibly fishing) and early Archaic technology in Del Mar (use of cobble tools, absence of bow and arrow). In summary, CA-SDI-7979 was a Middle Archaic shell midden camp whose excavation has contributed significantly to our understanding of mid-Holocene coastal adaptation in the Del Mar area.

CA-SDI-10149 (Anderson Canyon Site)

This site was a small, localized prehistoric deposit on a coastal bluff slope at the far south end of Del Mar (just south of 15th Street). Recorded in 1984 by Carrico and Theskin of WESTEC Services, it appeared as a "very concentrated lens of shellfish, ash, and flaked stone debris" exposed in an erosion gully. The cultural lens—only a few meters across—contained a dense pocket of marine shell (identified as scallop, oyster, and Venus clam), charcoal-rich soil, and a handful of lithic flakes from locally available quartzite and metavolcanic cobbles. No groundstone or pottery were noted, and no features or burials were observed. Carrico suggested the deposit might represent a single short-term camp or processing episode, perhaps the remains of a single hearth or dump of shellfish remains. The site was revisited by Brodie and Pigniolo in 2014 who noted the site's context had been altered by natural processes: slope wash had covered the lens, and a large erosional channel cut through the area. They mapped the site's location but found no visible midden or artifacts. It is likely that the remaining cultural material sits buried under colluvium or was washed downslope. Given its small size, CA-SDI-10149 is interpreted as an ephemeral Late Archaic camp or task site—perhaps a single cooking station on the bluff where a small group processed shellfish or other food, leaving behind a pocket of shell and ash. With no opportunity for extensive excavation before it was obscured, the site's data potential was limited. Nonetheless, it serves to demonstrate that even steep, rugged slopes in Del Mar were utilized at times—possibly as lookout points or places to procure particular resources (e.g., a freshwater seep or specific plant habitat)—resulting in tiny, short-lived archaeological deposits. Unfortunately, due to natural erosion and lack of in situ remains, CA-SDI-10149 contributes only minimal information beyond confirming a prehistoric presence on that hillside.

CA-SDI-10940 (SDM-W-34/34A, "Del Mar Man" site)

CA-SDI-10940, also known as SDM-W-34/34A and sometimes referred to as the "Del Mar Man" site, is a prehistoric habitation site located on a bluff along the sea cliff west of the Del Mar Race Track and Old Highway 1, within the City at the northwest point of the San Dieguito Slough. The site was originally

recorded in 1929 by Malcolm Rogers, who identified two loci: W-34, situated on an upper terrace, and W-34A, located approximately 24 feet below on a lower bench. Rogers described the site as having an extensive midden deposit, with features including cobble hearths (noted as very scarce), burials, and a variety of artifacts such as metate, flakes, projectile points, knives, hammer stones, a chopper, and a mano. Non-artifactual constituents documented at the site include shell, bone, and charcoal.

Two human burials have been documented at CA-SDI-10940. One burial was found in the bank between the two loci, with part of a femur mineralized with calcite. A second, fragmentary burial was exposed in the sea cliff of W-34A, though most of it had fallen into the sea. The burial known as "Del Mar Man" was initially dated by amino acid racemization to over 48,000 years before present (BP), but subsequent uranium-based dating revised the age to approximately 4,500–4,800 BP, placing it within the La Jolla cultural horizon.

Significance testing conducted in 1995 involved subsurface sampling, which produced positive returns including 9,228 grams of shell, 5 grams of bone, 56 pieces of debitage, five hammer stones, one chopper, and one mano fragment. The deposit was found to be nearly one meter thick and in good condition, although ongoing marine erosion poses a significant threat to the integrity of the site. The site retains a quantity, quality, and variety of artifacts and ecofacts suitable for research on prehistoric human behavior. The cultural context of CA-SDI-10940 is associated with the La Jolla tradition, characterized by shellfish gathering and simple stone tools, and the documented artifacts are consistent with both San Dieguito and La Jolla components.

CA-SDI-10940 is considered significant under CEQA criteria B, D, and E, due to its ability to address research questions, its age, and its stratigraphic integrity. The site should be protected and preserved, and any proposed development requires mitigation measures to avoid or minimize impacts. The presence of human burials makes the site highly sensitive, and Native American consultation is recommended prior to any further work. Today, only fragments of the site remain in place, and continued erosion threatens what remains. Most information about the site comes from the original site record and subsequent testing and analysis (Cheever 1995).

CA-SDI-17389 (Rogers W-46)

This site occupies a high ridge in northern Del Mar, about 90 meters above sea level at the west end of Crest Road. Malcolm Rogers recorded W-46 as a "highland accretion midden" resting on a red sandstone outcrop. Even by Rogers's survey (circa late 1930s), the site had been severely deflated by wind and rain: he noted the area was "completely denuded by erosion" with essentially no soil deposit left, only a scatter of artifacts and fire-reddened rock on the bare rock surface (Rogers 1939; Rogers, n.d.). The cultural material that could be discerned included several stone tool flakes, patches of shell, and clusters of fire-cracked rock indicating former hearths or roasting pits (Rogers 1939). No house features or middens remained; instead, Rogers described exposed sandstone "platforms" with embedded hearthstones as the only sign of the erstwhile site. Based on the artifacts, Rogers inferred that the main occupation was Late Prehistoric (Kumeyaay, ca. AD 1200–1800), essentially a "pure Diegueño II site" in his terminology. He did note a possible earlier (San Dieguito) component "trace," but the evidence for any Paleoindian use was minimal—perhaps a few older-looking flakes—and not enough to confirm a multicomponent status (Rogers, n.d.). In essence, CA-SDI-17389 appears to have been a Kumeyaay seasonal camp or lookout, strategically located on a high knoll with commanding views of the San Dieguito Valley and Pacific coast. Its occupants likely harvested resources in the uplands (such as acorns or agave) and used the site for food

processing, as suggested by the hearth remnants. The site's exposure to the elements led to the loss of its midden sediment; only artifacts trapped in crevices and the discolored rock surfaces attest to human activity. Rogers reported no cultural deposits deeper than the scoured rock and no cultural features beyond the hearths. No formal excavations have been conducted since, and the area remains open chaparral. In recent record searches, CA-SDI-17389 is noted but listed as having no remaining deposit (its record relies on Rogers's documentation). The site underscores the fact that not all archaeological sites in Del Mar are shell middens by the water; rather, some are inland, transient camps on hilltops which can be easily erased by natural forces. As of today, CA-SDI-17389 holds limited research value due to its poor integrity, but it is still of interest as part of the network of late prehistoric Kumeyaay sites across the Del Mar highlands (Rogers 1939; Rogers, n.d.).

Offshore Sites P-37-033561 and P-37-033562

These two archaeological sites are submerged just offshore of Del Mar and were identified during offshore dredging and survey programs. Each consists of a single large stone bowl artifact recovered from the seafloor, in contexts suggesting an ancient terrestrial origin (Hildebrand and York 2022). Specifically, one bowl was dredged from the San Dieguito "borrow site" about 0.5 kilometers offshore at approximately 8 meter water depth; the other was found off Solana Beach at approximately 12 meter depth (Hildebrand and York 2022). Both artifacts are finely made steatite bowls typically associated with the late Holocene La Jolla or early Kumeyaay cultures on land. Their discovery on the continental shelf indicates that parts of the coastal landscape occupied prehistorically have been inundated by post-glacial sea-level rise (Hildebrand and York 2022). Geological studies show that preserved peat and lagoon deposits of mid-Holocene age lie offshore of the San Dieguito River's mouth. The presence of these bowls confirms that intact prehistoric site components (once on dry land) now exist submerged offshore (Hildebrand and York 2022). While P-37-033561/62 themselves are isolated finds, they are significant because they demonstrate the archaeological potential of offshore landforms. In fact, these finds spurred renewed efforts to identify paleoland surfaces and to protect submerged cultural resources in the region (Hildebrand and York 2022). Future work (e.g., diver surveys or remote sensing) may locate the parent habitation sites for these artifacts on the paleo-shoreline now underwater. For cultural resource management, the documentation of sites 33-561 and 33-562 highlights that coastal development and sand dredging must consider underwater cultural heritage. The artifacts have been conserved, and further research is ongoing to more precisely date them (Hildebrand and York 2022). In summary, the offshore sites provide rare physical evidence of submerged prehistoric occupation on the Southern California coast, underscoring the need to include the offshore environment in archaeological inventories.

Historic-Period Archaeological Sites

CA-SDI-21312 (North Torrey Pines Bridge Trash Scatter)

This resource was first recorded in 2011 by Brian F. Smith and Associates as a historic trash scatter underneath the North Torrey Pines Road Bridge, just north of Del Mar. It consisted of discarded modern-historic debris (bottles, cans, hubcaps, and household trash), likely left by transients or tossed from cars (Callahan 2011). The scatter was fully collected and removed during the bridge replacement project around 2011, effectively destroying the site (Callahan 2011). In 2020, PanGIS archaeologists revisited the general area and confirmed that no trace remains within the project area; the site is considered destroyed and not eligible for the NRHP/CRHR due to lack of integrity (Mengers 2021). The California State Information Center has it on record as destroyed with no further action required (Mengers 2021).

CA-SDI-21996 (Historic Site "A-S-3")

This site is a historic-period trash dump located in Del Mar. It is a refuse scatter containing 1920s–1950s debris such as bottles, ceramics, and metal fragments, likely associated with mid-twentieth-century occupation of the area. It was recorded in 2014 by N. Turner of California State Parks (with the San Diego Archaeological Society) during a survey of the San Dieguito area (Turner 2014). The deposit was documented but not formally evaluated for significance. As a commonplace refuse dump of the 1929–1954 era with no distinguishing historical associations, it has not been proposed as NRHP/CRHR-eligible. It remains a recorded site with no eligibility determination.

CA-SDI-22048 (Historic Trash Dump "Del Mar–Z90289-1")

Also recorded as "Del Mar–Z90289-1," this is a concrete debris dump site. It consists of a pile of concrete blocks and pillars, believed to be remnants of historic streetlamp posts, located at the base of a steep slope along San Dieguito Road (Foglia et al. 2016). The chunks are partially submerged near the San Dieguito Lagoon's edge. AECOM archaeologists Shannon Foglia and Brian Spelts recorded the site in September 2016 during the SDG&E Coastal Reliability Project survey (Foglia et al. 2016). The site's attributes were logged (resource type "Privies/Dumps/Trash scatters"). It is clearly of historic origin (early-mid twentieth century) but was not evaluated as significant; rather, it was assigned a status code of 6Z, indicating it is not eligible for the NRHP/CRHR (Foglia et al. 2016). In other words, this is a minor refuse site with no further historical importance.

P-37-036421 ("Del Mar–Z90296-1" Isolate)

This resource is a single artifact isolate: a fragment of a clear glass insulator (the crown portion) likely from a historic telegraph or power line. It was found in 2016 by AECOM surveyors near the railroad corridor (Foglia et al. 2016). Because it is an isolated find (not associated with a larger site), it was documented with an "Other – AH16" designation (miscellaneous historic artifact). Isolates are not eligible for listing on the NRHP/CRHR by definition, and this piece was accordingly given a 6Z (ineligible) status in 2016 (Foglia et al. 2016). It has no further record beyond its documentation.

Built Environment Resources – Buildings

P-37-017450 – The Powerhouse Building and Smokestack

The Powerhouse Building and Smokestack, located in Del Mar, San Diego County, was first recorded by John B. Bahorski of the City of Del Mar in 1988. The resource was documented for the City's historic resources inventory, with no specific project report cited. The building and smokestack are situated at 1638 Coast Boulevard, within public parkland near the coast.

Constructed between 1926 and 1928, the Powerhouse Building is primarily composed of stucco and wood timbers, while the adjacent smokestack is a 65-foot-tall concrete structure. The exterior of the Powerhouse has remained virtually unchanged since its construction, with only minor damage noted; the interior has experienced some vandalism, but the overall condition of both structures is good. No major alterations have been made since their original construction. These buildings were originally constructed to provide power and hot water to the historic Hotel Del Mar and its Plunge (swimming facility), and they represent the last remaining structures from the Old Hotel Del Mar complex. William Kerckoff commissioned the buildings during Del Mar's early commercial development. It is included in the City's Historic Preservation

Overlay. The resource is listed with a California Historical Resource Status Code of 3S: appears eligible for NR as an individual property through survey evaluation.

P-37-035935 – Del Mar Infield Pavilion at the Del Mar Fairgrounds

This resource is a one-story building of irregular plan, constructed with brick and plywood, and featuring an attached scoreboard. Built around the 1960s, the pavilion has since been expanded and modified to host a range of events, including exhibits, sports, and concerts during the San Diego County Fair and racing season (Brunzell 2015).

Although the Del Mar Fairgrounds—opened in 1936 as a New Deal project—is historically significant, the pavilion was constructed after the original period of significance and does not display notable architectural distinction or association with important historic events (Brunzell 2015). Designed in a utilitarian Mid-Century Modern style and not attributed to a master architect, the pavilion remains intact and actively used, but its modifications and typical fairgrounds design result in a lack of distinctive historic character.

A 2015 Historic Resources Assessment recommended the Pavilion as not eligible for listing on the NRHP or CRHR, assigning it a likely CHR Status Code 6Z (Brunzell 2015). In summary, while the pavilion is prominent within the fairgrounds, it is not considered a significant historic resource.

P-37-035936 – Del Mar Racetrack Grandstand and Clubhouse Complex

This resource includes the Del Mar Thoroughbred Club Grandstand, clubhouse, and related structures at the Del Mar Fairgrounds. The racetrack opened in 1937, famously promoted by Bing Crosby, and quickly emerged as a California thoroughbred racing icon. While the original Spanish Colonial-style grandstand was largely replaced by a modern facility in 1991, elements from earlier decades remain, such as the paddock area, a 1940s stable, and the track's overall layout. The Human Resources Building, a 1920s/30s stucco structure now used for offices, is also part of this complex.

Historically, the Del Mar Racetrack is significant for its association with twentieth-century leisure and entertainment. It epitomizes the 1930s era of horse racing glamour—Bing Crosby welcomed the first guests in 1937—and has been a venue for renowned horses and Hollywood celebrities. The racetrack's enduring presence has helped shape Del Mar's development as a resort destination. Despite the grandstand's modern construction, the site's longstanding racing tradition and cultural landscape contribute to its historical importance.

In terms of integrity, the grandstand itself is new, so the original design and materials from 1937 are largely absent. However, the racetrack complex retains its historic function, location, and ongoing use, while the older Human Resources Building adds a touch of original character. Regarding eligibility, the racetrack complex has been considered eligible for listing and treated as a historical resource under CEQA in previous assessments. A 2006 Historic Assessment by LSA determined the fairgrounds and racetrack to be eligible as a historic district for its over 75-year regional role, even if individual buildings—like the renovated grandstand—are not original. More recent reviews (AECOM 2016) continue to regard the complex as significant. The complex is listed in the Built Environment Resource Directory with Status Code 6Y ("Determined ineligible for NR by consensus through Section 106 process – Not evaluated for CR or Local Listing"), signifying official recognition of its eligibility.

The grandstand complex (including the adjacent Horsemen's Club/Human Resources building) was originally built circa 1965 in a vernacular Modern style to serve the racetrack. It was surveyed in 2015 by Kara Brunzell and updated in 2016 by Monica Mello (AECOM) during evaluations for the fairgrounds (Brunzell 2015; Mello 2016). While the grandstand is a prominent landmark—hosting famous races and social events—previous studies did not find it eligible for the NRHP/CRHR. The 2006 LSA historic assessment treated the broader fairgrounds as a historical resource under CEQA, indicating local importance, but the 2015–2016 record concluded that the grandstand complex does not meet NRHP/CRHR criteria due to alterations and its mid-1960s age (Brunzell 2015; Mello 2016). Although locally famous as "Where the Turf Meets the Surf," it is not listed or eligible for state or national historic registers.

P-37-036412 – 1601 San Dieguito Drive (Residential Property)

This is a single-family residence in Del Mar recorded as a raised Ranch-style house built in 1965. It was documented by AECOM architectural historian Monica Mello in 2016 during the SDG&E Coastal Reliability project survey (Mello 2016). The house features a mid-century Ranch design typical of post-World War II suburban development. By 2016, it had undergone some modifications but still retained its general 1960s character. The survey evaluation found that the property lacked sufficient architectural distinction or historical association to meet significance criteria. In the site record, the conclusion was that 1601 San Dieguito Drive is not eligible for NRHP or CRHR listing, due to only moderate integrity and no notable historical importance (Mello 2016). It was given a Status Code of 6Z (ineligible). In short, this ordinary 1965 ranch house does not qualify as a historic resource.

P-37-036413 – 1604 San Dieguito Drive (Residential Property)

This is a single-family residence, built in 1967 in an eclectic Ranch style. It was recorded and evaluated by AECOM in October 2016 (Mello 2016). The house exhibits some custom features but has also been altered over time. Like its neighbor above, it represents the post-war residential expansion of Del Mar. The historic assessment determined that, although the home retains a fair degree of 1960s "feel," it does not have significant architectural merit or association with important persons/events that would make it eligible for the NRHP or CRHR (AECOM 2016; Mello 2016). Therefore, 1604 San Dieguito Drive was recommended ineligible for listing. The City and SDG&E accepted this finding, and the property has no historic designation.

P-37-036415 – SDG&E TL666D and Del Mar Substation

P-37-036415 documents a segment of SDG&E's Transmission Line TL666 within the Del Mar corridor, constructed in 1918 and recorded in 2016 during the Coastal Reliability project (AECOM 2016). This segment consists of approximately 96 utility poles (primarily wood, some replaced with steel), transmission towers, posts, and wires. The line was formally evaluated for historical significance and found to be associated with broad patterns of local and regional history as an early high-voltage transmission corridor in San Diego County. However, due to extensive upgrades, replacements, and changes to the surrounding setting, the segment does not retain sufficient integrity of materials, workmanship, setting, and feeling to qualify for listing in the National Register of Historic Places or the California Register of Historical Resources. The resource remains in use as a utility corridor, but its historic character has been substantially diminished by modernization and maintenance activities.

P-37-036422 – 2260 Jimmy Durante Blvd (Del Mar Blue Print Co. Building)

This resource is a commercial warehouse building at the south end of Del Mar, constructed circa 1955. It is a large, rectangular, corrugated metal structure that historically housed the Del Mar Blue Print Company and an automotive shop on the same parcel. The property was recorded in September 2016 during the SDG&E project survey (Foglia et al. 2016). The building is utilitarian in style—essentially a mid-century industrial shed—occupying an entire lot adjacent to the San Dieguito Lagoon. By 2016 it was still in use (with modern additions like fencing and pavement). The historic review noted the structure appears in aerial photos by 1964 and is a straightforward example of a 1950s light industrial building. It does not embody distinctive architectural qualities, nor is it known for significant events. Accordingly, the record indicates it was given an NRHP Status Code of 6Z, meaning found ineligible for NRHP/CRHR (Foglia et al. 2016). In sum, the Del Mar Blue Print/Auto warehouse, while over 60 years old, did not meet the criteria for historic listing.

Built Environment Resources – Structures and Objects

P-37-024194 (1910 AT&SF Storm Drain and Retaining Wall – Feature 1)

This resource is a concrete storm drain pipe and retaining wall at the base of the Del Mar coastal bluff, likely built in 1910 as part of the Atchison, Topeka & Santa Fe Railway's (AT&SF) "Red Car" line along the blufftop. It was originally recorded in 2001 by ASM Affiliates during the Del Mar Bluffs Stabilization Project 1 and was at that time recommended not eligible for listing in either the NRHP or CRHR (Ní Ghabhláin and Pallette 2001). A 2018 survey update by PanGIS, Inc. observed that the retaining wall had collapsed into large concrete chunks on the beach and the iron outfall pipe was broken (Mengers 2018). The site was revisited in April 2020 during Del Mar Bluffs Project 5 and found in the same collapsed condition (Mengers 2021). The Federal Railroad Administration (FRA), as lead agency for a related project, issued a determination in 2021 that this storm drain feature is not eligible for NRHP listing, a finding concurred with by the State Historic Preservation Officer on May 28, 2021 (Mengers 2021).

P-37-024195 (1910 AT&SF Bluff Spillway and Retaining Wall – Feature 2)

This resource is a concrete retaining wall and spillway (drainage chute) that extends from the top of the Del Mar bluff down to its toe. Like Feature 1, it was built circa 1910 as part of the historic AT&SF railroad infrastructure. ASM Affiliates recorded it in 2001 (Del Mar Bluffs Project 1) and a subsequent evaluation in 2002 confirmed it was not eligible for NRHP/CRHR listing (Ní Ghabhláin and Pallette 2002). A 2018 field check by PanGIS noted the feature remained as described in 2002 (Mengers 2018). A 2020 survey relocation recorded its precise coordinates and confirmed no changes in condition (Mengers 2021). As with Feature 1, FRA determined in 2021 that Feature 2 is not NRHP-eligible, with SHPO concurrence (Mengers 2021).

P-37-024196 (1910 AT&SF Retaining Wall Segment – Feature 3)

This resource is an approximately 60-foot-long concrete retaining wall associated with the 1910 railway construction. It was recorded by ASM in 2001 during the initial Del Mar Bluffs survey (Ní Ghabhláin and Pallette 2001). The wall remains intact and was found unchanged during later re-surveys in 2018 and 2020, aside from more precise locational data gathered (Mengers 2018, 2021). It has not been formally reevaluated since the original record, but like other features of this system, it was recommended not

eligible for NRHP/CRHR (Ní Ghabhláin and Pallette 2001). No eligibility concurrence from SHPO was deemed necessary beyond the earlier recommendations.

P-37-024197 (10th Street Footbridge Foundations & Natatorium Pilings – Feature 4)

This complex resource includes the concrete foundations of a gazebo and footbridge built in 1910 across the railroad at 10th Street, a fence made from a former bridge deck, and wooden pilings on the beach that are remnants of an 1890s seaside swimming pool (the Del Mar Natatorium). ASM Affiliates recorded these features in 2001 (Ní Ghabhláin and Pallette 2001). A significance evaluation completed in 2018 (as part of Del Mar Bluffs Project 4) concluded the combined site was not eligible for the CRHR due to loss of integrity (Mengers 2018). However, the surviving natatorium pilings on the beach are considered locally important as historical landscape features; the City has leased that beach area to ensure their protection (Mengers 2021). The 2020 survey noted some additional fence collapse but no major changes to the site (Mengers 2021). No NRHP/CRHR listing has been sought, and the site is regarded as not significant for those registers while the pilings remain preserved in place as a City interest.

P-37-024198 (1910 AT&SF Storm Drain System Segment – Feature 5)

This resource is another concrete storm drain outlet and associated retaining wall at the bluff base, also dating to the AT&SF railway's 1910 construction. It was initially recorded in 2001 by ASM (Ní Ghabhláin and Pallette 2001) and identified as similar in function to Feature 1. By 2018, much of this feature had been impacted by modern infrastructure: a new storm drain system with a catch basin was installed nearby, and the only remnants of the historic feature were a few wooden railroad ties from the original inlet (Mengers 2021). It was previously recommended not eligible for listing (Ní Ghabhláin and Pallette 2001), and the FRA/SHPO determinations in 2021 likewise did not find it eligible for the NRHP (Mengers 2021).

P-37-024199 (1910 AT&SF Collapsed Retaining Wall – Feature 6)

This resource is a concrete retaining wall tied to the 1910 railroad construction. By the time it was first documented in 2001 (Del Mar Bluffs survey), the wall had already collapsed onto the ground (Ní Ghabhláin and Pallette 2001). It was revisited in 2018 and 2020 and found in essentially the same collapsed state, though detailed descriptions and coordinates were updated (Mengers 2018, 2021). It is not NRHP/CRHR-eligible per the original survey findings (Ní Ghabhláin and Pallette 2001), a conclusion affirmed by the absence of any contrary evaluation.

P-37-024200 (1910 AT&SF Upper Bluff Retaining Wall – Feature 8)

This resource is a concrete retaining wall near the top of the bluff, also thought to have been built circa 1910 for the railroad. ASM's 2001 survey recorded it as "Feature 8," a high bluff-top wall possibly related to storm water control along the tracks. They recommended the site not eligible Later surveys noted no substantial changes; the 2020 fieldwork provided a more complete description and precise mapping. The Federal Railroad Administration (FRA), as lead agency on the Proposed Pacific Surfliner Coastal Bluff Trackbed Stabilization and Seismic Improvement Project, determined that this property is not eligible for listing in the National Register of Historic Places (FRA_2021_0405_001). The State Historic Preservation Officer concurred with this determination on May 28, 2021.

P-37-024201 (1910/1941 AT&SF Retaining Wall and Culvert – Feature 9)

This resource is a large concrete retaining wall with an integrated culvert at the base of the bluff. It was constructed in 1910 and later improved (extended or buttressed) in 1941, all as part of the AT&SF railroad corridor stabilization (Ní Ghabhláin and Pallette 2001). ASM recorded it in 2001 (Feature 9), and it was revisited in 2018/2020 with no major changes observed (Mengers 2018, 2021). Like the other railroad features, it was recommended not eligible for NRHP/CRHR listing due to its common engineering nature and altered condition (Ní Ghabhláin and Pallette 2001). There has been no new eligibility finding beyond SHPO's concurrence in general that these 1910 railway remnants are not individually significant.

P-37-024249 (1910/1941 AT&SF Base-of-Bluff Retaining Wall – Feature 7)

This resource is another concrete retaining wall at the bluff base associated with the 1910 railroad construction (and apparently improved in 1941, similar to Feature 9) (Ní Ghabhláin and Pallette 2001). It was oddly numbered out of sequence, but corresponds to "Feature 7" from the 2001 ASM survey. The wall was revisited in 2020 and still matches its original description (Mengers 2021). It has never been found significant; the original record and subsequent reviews did not identify it as eligible for historic registers (Ní Ghabhláin and Pallette 2001).

It is noted that the nine AT&SF railway features (P-37-024194/195/196/197/198/199/200/201/249) were documented during stabilization studies (Ní Ghabhláin and Pallette 2001, 2002). All were found to be ordinary infrastructure components of the 1910 railroad grade and were collectively recommended *not eligible* for historic designation. They remain in various states of ruin along the bluffs. No further work was required for them aside from standard construction monitoring during bluff projects.

P-37-034956 – San Dieguito River Railroad Bridge

The San Dieguito River Railroad Bridge, also known as Bridge 243, was recorded by ASM Affiliates in 2009 as part of the San Dieguito River Bridge Replacement and Second Track Project (Ní Ghabhláin et al. 2009). The bridge is located in northern San Diego County, spanning the San Dieguito River near the City.

Bridge 243 is a ballast-deck timber pile trestle railroad bridge, measuring approximately 1,100 feet in length and 19 feet in width, with a maximum height of about 30 feet. The structure consists of 79 spans, each 14 feet long, supported by bents of six timber piles with bi-directional cross bracing and steel stringers and caps. As-built drawings indicate that the current bridge was constructed in 1916 following severe flooding that destroyed the previous structure, with extensions added to both the east and west sides. Some records suggest a significant rebuild or repair occurred in 1926, and date nails in the railroad ties indicate ongoing maintenance, with the oldest dating to 1927. The bridge was designed by R.B. Ball, Engineer Grand Division, and built by the AT&SF Railroad. It remains in use today and is owned by the North County Transit District.

The bridge was evaluated for eligibility for the NRHP and, by extension, the CRHR. Although it meets the age threshold for consideration, the bridge was found not to be associated with significant historical events or trends and is representative of a common bridge type used by the Santa Fe and other railroads. It does not exhibit unique or exceptional design or engineering characteristics. As a result, the bridge was recommended as not eligible for listing in the NRHP or the California Register (Ní Ghabhláin et al. 2009: 17–18).

P-37-035160 – T-Mobile West LLC SD06288A/Crest Way Water Tank

The Crest Way Water Tank, also identified as T-Mobile West LLC SD06288A/Crest Way Water Tank, was first recorded by Crawford Historic Services in 2013. Constructed around 1953, the Crest Way Water Tank is a Modern-style, round, bolted steel structure standing approximately 37 feet, 9 inches above ground level. The tank is enclosed within a fenced compound, features large steel pipes for water distribution, and is surrounded by mature landscaping and equipment storage areas. The tank was built to support the expansion of Del Mar's public utility infrastructure during a period of significant residential growth in the 1950s.

The Crest Way Water Tank was evaluated for eligibility for listing in the NRHP and was recommended as not eligible for listing in the NRHP and was not assessed for eligibility under the CRHR or local Del Mar criteria.

P-37-036273 "A-S-1" Historic Site (Sorrento Valley Industrial Park)

This resource (recorded as "A-S-1") is a historic concrete sewer holding tank dating to 1936. It consists of a circular concrete septic or sewer tank with an iron manhole cover reading "City of Del Mar Sewage 1936 – Standard Iron Works". It was discovered and recorded in 2014 by California State Parks archaeologists during a survey (Chatelain et al. 2014). The tank is an isolated infrastructure relic and was not formally evaluated for NRHP/CRHR eligibility. Given its utilitarian nature and the fact that it remains an abandoned piece of 1930s public works, it was recommended as not individually eligible in the record (Chatelain et al. 2014). No official eligibility determination has been made.

P-37-036423 – Old Grand Avenue Bridge (World War II Era Timber Trestle)

This is the preserved remains of a 1943 wooden trestle bridge in Del Mar. The Old Grand Avenue Bridge originally spanned the San Dieguito River, providing access to a World War II U.S. Navy training facility (a coastal airfield) at the Del Mar Fairgrounds. After the war, it continued to be used for access to the fairgrounds and later was partially removed. Today, one segment of the bridge (extending from the south shore partway over the lagoon) survives as a pedestrian lookout as part of the River Walk Trail. This bridge remnant was documented in 2016–2017 by the Anthropological Studies Center (ASC) for the City (ASC 2017). It is a wood and concrete trestle structure. Historically, it is associated with the World War II era activity (blimp patrols and military presence) and early post-war use of the fairgrounds. However, the bridge is no longer intact—only a portion remains—and a modern concrete viewing platform has been added. The evaluation in 2017 found that while the bridge has local interest, it lacks the integrity and significance for NRHP or CRHR eligibility (the bridge was given status 6L, "determined ineligible for NRHP, eligible as local landmark" by the City) (ASC 2017). In effect, the Old Grand Avenue Bridge is not NRHP/CRHR-listed; it is recognized as a Del Mar local historical feature and is being preserved in a park setting, but it did not meet the formal criteria for state or national registers.

P-37-039579, P-37-039580, P-37-039581, P-37-039582

These four resources were newly recorded by PanGIS archaeologists in April 2020 during the Del Mar Bluffs 5 project. All are features associated with the historic railway infrastructure:

P-37-039579 (DMB5-02) is a concrete foundation of a former railroad signal or similar trackside equipment, likely dating to the mid-twentieth century (pre-1970s) signaling system (Mengers 2021).

P-37-039580 (DMB5-03) is a historic-era concrete drainage chute on the bluff. The upper portion appears to be the original 1910 railway storm water chute, now capped and partly rerouted by a modern concrete cover at the bottom (Mengers 2021).

P-37-039581 (DMB5-04) is an iron pipe outlet set in the bluff face, about 6 feet above the ground, encased in concrete. It likely served as part of the 1910 railway's drainage system, carrying runoff through the bluff (Mengers 2021).

P-37-039582 (DMB5-05) is a concrete foundation footing protruding from the bluff, believed to be part of a 1910 retaining wall or possibly a bridge abutment related to the railroad (Mengers 2021).

All four resources were recorded in detail in 2020 during the Del Mar Bluffs 5 project. Each was formally evaluated for NRHP/CRHR eligibility in December 2020 and found not eligible. These determinations were confirmed by both the Federal Railroad Administration and the California State Historic Preservation Officer in 2021. (Mengers 2021).

4.1.2 Sacred Lands File Search Results and NAHC Contact List

On September 10, 2025, Michael Baker requested that the NAHC search the Sacred Lands File for any tribal cultural resources that might be affected by the project. The NAHC responded in a letter dated September 17, 2025, stating that the search of the Sacred Lands File was negative. The NAHC also provided a list of tribal contacts who may have knowledge regarding tribal cultural resources in the vicinity of the project area (**Table 4**). The NAHC correspondence is presented in **Appendix B**. Michael Baker did not send notification letters to the tribal contacts provided by the NAHC but did send the list of contacts to the City. The City will mail AB 52 consultation letters to the tribal contacts. AB 52 compliance will be documented in the PEIR, including any written correspondence with tribes and agreed-upon mitigation.

TABLE 4: NAHC CONTACT LIST FOR DEL MAR CIP PEIR PROJECT

Tribe Name	Contact Person	Fed (F) Non-Fed (N)	Contact Info
Barona Group of the Capitan Grande	Art Bunce, Attorney	F	1095 Barona Road Lakeside, CA, 92040 (760) 489-0329 Buncelaw@aol.com
Campo Band of Diegueno Mission Indians	Daniel Tsosie, THPO	F	36190 Church Road, Suite 1 Campo, CA, 91906 (619) 760-6480 Dtsosie@campo-nsn.gov
Campo Band of Diegueno Mission Indians	Ben Dyche, Vice Chairperson	F	36190 Church Road, Suite 1 Campo, CA, 91906 (619) 478-9046 Bdyche@campo-nsn.gov
Campo Band of Diegueno Mission Indians	Marcus Cuero, Chairperson	F	36190 Church Road, Suite 1 Campo, CA, 91906 (619) 478-9046 Marcuscuero@campo-nsn.gov
Ewiiaapaayp Band of Kumeyaay Indians	Eduardo Mercado, Principle	F	1 Crestwood Road Boulevard, CA, 91905 (619) 301-4794 Emercado75@hotmail.com

TABLE 4, CONTINUED

Tribe Name	Contact Person	Fed (F) Non-Fed (N)	Contact Info
Iipay Nation of Santa Ysabel	Clint Linton, Director of Cultural Resources	F	P.O. Box 507 Santa Ysabel, CA, 92070 (760) 803-5694 Clint@redtailenvironmental.com
Inaja-Cosmit Band of Indians	Rebecca Osuna, Chairperson	F	2005 S. Escondido Blvd. Escondido, CA, 92025 (760) 747-8568
Jamul Indian Village	Erica Pinto, Chairperson	F	P.O. Box 612 Jamul, CA, 91935 (619) 669-4785 Epinto@jiv-nsn.gov
Jamul Indian Village	Lisa Cumper, THPO	F	P.O. Box 612 Jamul, CA, 91935 (619) 669-4855 Lcumper@jiv-nsn.gov
La Posta Band of Diegueno Mission Indians	Eric La Chappa, Chairman	F	8 Crestwood Road Boulevard, CA, 91905 (619) 478-2113 ELaChappa@lptribe.net
Manzanita Band of Kumeyaay Nation	Angela Elliott Santos, Chairperson	F	P.O. Box 1302 Boulevard, CA, 91905 (619) 766-4957
Mesa Grande Band of Diegueno Mission Indians	Michael Linton, Chairperson	F	P.O Box 270 Santa Ysabel, CA, 92070 (760) 782-3818
Pauma Band of Luiseno Indians	Lucia Majel, Cultural Resource Project Manager	F	P.O. Box 369 Pauma Valley, CA, 92061 (760) 742-1289 Crm@Pauma-nsn.gov
Rincon Band of Luiseno Indians	Cheryl Madrigal, Cultural Resources Manager/THPO	F	One Government Center Lane Valley Center, CA, 92082 (760) 648-3000 Cmadrigal@rincon-nsn.gov
Rincon Band of Luiseno Indians	Joseph Linton, Tribal Council/Culture Committee Member	F	One Government Center Lane Valley Center, CA, 92082 (760) 803-3548 Jlinton@rincon-nsn.gov
Rincon Band of Luiseno Indians	Denise Turner Walsh, Attorney General	F	One Government Center Lane Valley Center, CA, 92082 (760) 689-5727 Dwalsh@rincon-nsn.gov
Rincon Band of Luiseno Indians	Laurie Gonzalez, Tribal Council/Culture Committee Member	F	One Government Center Lane Valley Center, CA, 92082 (760) 484-4835 Lgonzalez@rincon-nsn.gov
San Pasqual Band of Diegueno Mission Indians	Allen Lawson, Chairperson	F	P.O. Box 365 Valley Center, CA, 92082 (760) 749-3876

TABLE 4, CONTINUED

Tribe Name	Contact Person	Fed (F) Non-Fed (N)	Contact Info
Sycuan Band of the Kumeyaay Nation	Bernice Paipa, Cultural Resource Specialist	F	Sycuan Cultural Center: 910 Willow Glen Drive El Cajon, CA, 92019 (760) 749-3200 Bpaipa2@sycuan-nsn.gov
Sycuan Band of the Kumeyaay Nation	Cody Martinez, Chairman	F	Sycuan Tribal Office: 1 Kwaaypaay Court El Cajon, CA, 92019 (619) 445-2613 Cmartinez@sycuan-nsn.gov
Viejas Band of Kumeyaay Indians	Ray Teran, Resource Management Director	F	1 Viejas Grade Road Alpine, CA, 91901 (619) 659-2312 Rteran@viejas-nsn.gov
Viejas Band of Kumeyaay Indians	Ernest Pingleton, THPO	F	1 Viejas Grade Road Alpine, CA, 91901 (619) 445-3810 Epingleton@viejas-nsn.gov

4.1.3 Native American Consultation and Outreach

Michael Baker has not conducted any outreach to the tribes to obtain information regarding tribal cultural resources within the City. In some instances, Michael Baker archaeologists reach out to tribal contacts provided by the NAHC as part of a due diligence effort to obtain information regarding areas with potential tribal cultural sensitivities or general tribal knowledge of the area. For this particular study, Michael Baker has not sent these requests for information to the tribes so as to avoid confusion or overlap during the City's AB 52 consultation process.

4.2 Paleontological Resources

On September 25, 2025, Michael Baker staff requested the San Diego Natural History Museum (SDNHM) to search its holdings for documented paleontological resources located in the City or within 5 miles of the City, provided they came from the same, or similarly aged, geologic deposits to those found within the City. The SDNHM responded in a letter dated October 22, 2025 (**Confidential Appendix C**). The records search found two definitive fossil localities within the City and 622 more fossil localities that lie within 5 miles of the City. Additionally, there are three more fossil localities from the Delmar Formation with poor geographic control that are believed to be within the City. More information about the localities within 5 miles of the City are listed below (**Table 5**); however, specific location data for each locality is confidential and available to view on the maps provided in the SDNHM Records search letter in **Confidential Appendix C**.

TABLE 5: SDNHM RECORDS SEARCH PALEONTOLOGICAL LOCALITIES WITHIN 5 MILES OF THE CITY

Collection Number	Taxa	Formation	Chronological Unit
2966, 4306, 4313, 4327, 4210, 5935, 69, 2853, 2903, 2904, 3241, 3242, 3861, 3904, 5008–5010, 5018, 6553–6558, 6560–6563, 7737, 4164, 4278, 4279, 4353, 6092*, 68, 2987, 5001, 6586, 7500,	Trace fossils, flowering plants, foraminifers, marine invertebrates (e.g., corals, polychaete worms, bryozoans, clams, mussels, scallops, oysters, pen shells, jingle shells, chitons, tusk shells, snails, bubble snails, sea urchins, heart urchins, sand dollars, crabs, ghost shrimp, mantis shrimp, barnacles, and ostracods), marine vertebrates (e.g., rays and bony fish), and terrestrial vertebrates (e.g., amphibians, lizards, birds, rodents, rabbits, giant ground sloth, horse, camel, and bison)	Bay Point Formation (Old paralic deposits, Units 2-4 and 6)	Late Pleistocene
4172–4173, 4290–4291, 4454, 4474, 4515, 5418, 6180, 6190, 6770, 7892, 8738	Trace fossils (borings, burrows, and internal molds of clams), nearshore marine invertebrates (clams, scallops, snails, barnacles, and sand dollars), marine vertebrates (sharks and baleen whales)	Lindavista Formation (Very old paralic deposits, Unit 11)	Early to Middle Pleistocene
3913, 3948, 3951, 3953–3957, 3960, 3968, 3269, 3282, 3285, 3847, 3859–3860, 3910, 4456, 5793, 6086, 7273–7274, 7816, 8375–8377	Trace fossil burrows, vascular plants, marine invertebrates (corals, polychaete worms, brachiopod, clams, oysters, tusk shells, snails, sea urchins, an insect, barnacles, crabs, and shrimp), marine vertebrates (sharks and bony fishes), terrestrial vertebrates (lizard, birds, and rodents)	Torrey Sandstone	Middle Eocene
5624–5631, 134, 182–183, 454, 2304–2305, 2722–2723, 3407*, 3542, 3547, 3565, 3671, 3791–3796, 3829, 3848, 3850, 3854–3856, 3884, 3915–3916, 3975, 4062–4065, 4284, 4947, 5193–5194, 5314, 5437, 5633, 5923, 6002–6006, 6564–6570, 6587–6589, 6706–6708, 6858–6864, 7787–7815, 7817, 7820, 7928, 8367–8368, 8525–8528	Carbonized logs, trace fossils (borings and burrows), plants, marine invertebrates (bryozoans, snails, clams, mussels, oysters, crabs, barnacles, ostracods, and sea urchins), marine vertebrates (sharks, rays, and bony fishes), and terrestrial vertebrates (lizard, turtle, crocodile, rodent, stem perissodactyl, and tillodont)	Delmar Formation	Middle Eocene

Note: Fossil localities marked with an asterisk occur within the City.

Of the 624 localities in the SDNHM records search, 209 localities are from similar geologic formations and members to those formations found within the City or found just outside the City, including localities from unnamed but likely relevant Quaternary sediments, Friars Formation, Scripps Formation, Ardath Formation, Point Loma Formation, and Santiago Peak Volcanics. Although these localities are not from geologic units found at the surface of the City, these formations and their fossil material may be encountered below the anticipated mapped geologic units as basement rocks or as reworked sediment within younger surficial alluvium. These localities are listed in a separate table below (**Table 6**).

TABLE 6: SDNHM RECORDS SEARCH ADDITIONAL LISTED RELEVANT LOCALITIES WITHIN 5 MILES OF THE CITY

Collection Number	Taxa	Formation	Chronological Unit
3945A, 3945C, 3945D, 3945, 3946, 3947, 3945B	Mollusca	Unnamed Quaternary estuarine deposits	Holocene
4508	Porifera, bryozoan, bivalves	Unnamed marine deposit	Holocene
129	Gastropods, bivalves	Pleistocene Landslide Deposits	Pleistocene
2626	Gastropods, bivalves	unlabeled	Pleistocene?
6871, 7910, 7911, 7912, 3898, 4514, 6769,	Gastropods, bivalves, plants	Friars Formation	Middle Eocene
3381, 3830, 3919–3921, 4146, 4147, 4166–4171, 4207, 4214, 4216–4217, 4229, 4231–4240, 4275, 4316, 4334, 4337–4338. 4341–4342, 4438–4441, 4444, 4453, 4461, 4475–4478, 4530, 4552, 4700-4703, 4712–4714, 4723, 4853-4854, 4893, 4901, 4904, 4968-4970, 4989–4999, 5403–5405, 5450–5451, 5531–5535, 5577–5578, 5590–5592, 5596–5605, 5612–5614, 5620, 5637–5643, 5645, 5649–5655, 5723, 5726, 5792, 6007–6008, 6019, 6127–6128, 6220, 6329, 6396–6397, 6425–6427, 6429, 6672–6675, 6746–6753, 6830–6835, 6849–6857, 6872–6877, 7225, 7290–7301, 7304–7316, 7325–7326, 7331, 7334–7337, 7342–7343, 7368, 7377–7381, 7593, 7619–7620, 7644, 7680–7682, 7728–7734, 7893–7895, 7968–7969, 7985–7986, 8321–8322, 8371–8373, 8586–8587, 8726–8737, 8743, 8400–8409, 8562, 5478, 4202, 4205, 4208, 4211–4212, 4218, 4226, 4241–4245, 8425, 8429, 8432, 4335, 4865–4866	Marine invertebrates (bryozoans, snails, clams, mussels, oysters, crabs, barnacles, ostracods, and sea urchins)	Scripps Formation	Middle Eocene
4202, 4205, 4208, 4211–4212, 4218, 4226, 4241–4245, 8425, 8429, 8432, 4335, 4865–4866, 2302, 3284, 3797, 3857, 3865, 3911–3912, 3914, 3917–3918, 3922–3935, 3949–3950, 3952, 3958–3959, 3961–3967, 3969–3974, 3976–3981, 4201, 4203–4204, 4206, 4209, 4213, 4215, 4219–4225, 4227–4228, 4230, 4336, 4529, 4551, 4553, 4887, 4894–4895, 4900, 4902–4903, 4915, 5408–5409, 5505, 5580–5581, 5668, 6009, 6027, 6126, 6184, 6611–6615, 6671, 6679–6682, 6756–6757, 7303, 7366–7367, 7376, 7643, 7679, 8278–8279, 8300–8320, 8420–8421, 8428, 8430	Bivalves, gastropods, decapods, fishes (Osteichthyes), and plants	Ardath Shale	Middle Eocene
8046, 8333–8334	Ammonites (*Baculites lomeaensis*), plants, echinoderms, molluscs, bryozoa	Point Loma Formation	Cretaceous
3170, 3310–3311	Bivalves, plants	Santiago Peak Volcanics	Jurassic

Note: None of the units listed in Table 6 are geologically mapped at the surface within the City. However, deep ground disturbance may uncover these units at depth. Exact locations and depths of this would require additional geotechnical testing during the planning phase of individual projects.

In addition to the official paleontological records search requested from the SDNHM, Michael Baker conducted supplemental paleontological records searches within online public databases for localities within 5 miles of the City from similarly aged or the specifically named geologic units found within the City. Websites and databases used included the Paleobiology Database (PBDB), which collects digital data about fossil localities from multiple repositories across the state and country, and the University of California Museum of Paleontology (UCMP), which was the primary repository for Californian paleontological fossil specimens before and through the 1960s.

The UCMP listed one locality within 5 miles of the City and from an Eocene geologic unit. Locality UCMP 7170 consisted of fossil remnants of a pine tree (*Pinus delmarensis)* from the McGonigle Canyon area from an unknown Eocene geologic unit (UCMP 2025).

The PBDB listed nine localities within 5 miles of the City from middle Eocene-aged Delmar and Torrey Formations. No localities from Holocene or Pleistocene age sediments were recorded in their database (PBDB 2025). The named localities are listed with their taxa, formation, chronological unit, and location relative to the City in the table below (**Table 7**).

TABLE 7: PALEOBIOLOGY DATABASE LOCALITIES WITHIN 5 MILES OF THE CITY

Collection Number	Taxa	Formation	Chron. Unit	Distance and Direction from the City
16422	Tilodont mammal (*Trogosus castoridens*), Perissodactyl (*Hyrachyus modestus*), crocodile (*Pristichampsus* sp).	Delmar Formation of the La Jolla Group	Eocene	5 Miles North
200729	Gastropods (*Calyptraea cf. diegoana, Crommium andersoni, Nerita triangulate, Potamides carbonicola, Pyrgulifera cf. lajollaensis, Anomia mcgoniglensis, Cuneocorbula torreyensis, Myrtucina cf. roseburgensis, Ostrea idriaensis, Pelecyora* cf. *Aequilateralis*)	Delmar Formation of the La Jolla Group	Eocene	1 Mile Southeast
200730	Bivalves (*Calyptraea diegoana, Ostrea idriaensis, Pelecyora aequilateralis*)	Delmar Formation of the La Jolla Group	Eocene	1 Mile South
200731	Gastropods (*Calyptraea diegoana, Crommium cf. andersoni, Loxotrema turritum, Nerita triangulate, Potamides carbonicola, Pyrgulifera lajollaensis)*, Bivalves (*Brachidontes* cf. *cowlitzensis, Cuneocorbula torreyensis, Myrtucina roseburgensis, Ostrea idriaensis, Panope torreyensis, Pelecyora aequilateralis, Tivelina* cf. *idriaensis*).	Delmar Formation of the La Jolla Group	Eocene	1 Mile South
200732	Gastropods (*Calyptraea diegoana, Crommium andersoni, Loxotrema turritum, Neverita globosa, Potamides carbonicola*), Bivalves (*Cuneocorbula torreyensis, Myrtucina roseburgensis, Panope torreyensis, Pelecyora aequilateralis*).	Delmar Formation of the La Jolla Group	Eocene	1 Mile South
200733	Gastropods (*Crommium andersoni, Loxotrema turritum, Nerita triangulate, Potamides carbonicola, Myrtucina roseburgensis*), Bivalves (*Ostrea cf. idriaensis, Pelecyora aequilateralis, Tellina cf. jollaensis*)	Delmar Formation of the La Jolla Group	Eocene	1.5 Miles South
200734	Gastropods (*Calyptraea diegoana, Crommium* cf. *andersoni, Loxotrema turritum, Nerita triangulate, Neverita globosa, Potamides carbonicola*), Bivalves (*Brachiodontes cowlitzensis, Cuneocorbula torreyensis, Lithophaga clarki, Myrtucina* cf., *roseburgensis, Ostrea idriaensis, Panope torreyensis, Pelecyora equilateral's, Solen parallelus, Tellina jollaensis*)	Delmar Formation of the La Jolla Group	Eocene	1.5 Miles South
200735	Bivalves (*Ostrea idriaensis)*	Delmar Formation of the La Jolla Group	Eocene	1.5 Miles South
204961	Bivalves (*Acanthocardia* cf. *brewerii, Ostrea* cf. *idriaensis*)	Torrey Formation of La Jolla Group	Eocene	2 Miles South

5.0 RESOURCE SENSITIVITY MODELING

5.1 Utility for CEQA Impact Analysis and Mitigation

In the context of CEQA and the PEIR for the proposed project, the sensitivity models are a valuable planning and decision-support tool. They provide a proactive identification of high-risk areas for archaeological resources across the City. By mapping very high and high sensitivity zones, the model helps the City and project planners anticipate where there is a greater likelihood of impacting significant archaeological, built environment, and paleontological resources. This can inform land use decisions and project design—for instance, if a proposed development lies in a very high resource sensitivity area, the City can require early surveys, extended testing, and/or monitoring during construction, as appropriate for CEQA compliance. Conversely, in low sensitivity areas, the probability of discovery is low, which might streamline review or justify lesser levels of investigation. In essence, the models allow prioritization of survey and mitigation efforts: areas depicted as high sensitivity can be targeted for intensive study or avoidance, thereby focusing limited resources where they are most needed. It also has the benefit of potentially reducing costly surprises—by identifying sensitive areas in advance, the City can avoid or redesign projects in those locations (e.g., routing infrastructure through a lower-sensitivity corridor if feasible), or at least be prepared with a mitigation plan. This aligns with common cultural resource management practice, where agency-wide sensitivity maps are used to manage and protect archaeological resources (often referenced in general plan conservation elements or resource management plans). This approach does not replace field survey or site-specific evaluation, but it provides an important landscape-level assessment that helps efficiently manage resources by flagging hotspots of archaeological, built environment, and paleontological potential in the City's PEIR.

5.2 Archaeological Resources

Michael Baker created an archaeological sensitivity model in ArcGIS Pro to assess the likelihood of subsurface prehistoric cultural resources within Del Mar. Using a weighted overlay GIS approach (Taylor 2018), several variables affecting site location and preservation were standardized to a 1–5 sensitivity scale and weighted by relevance. The resulting sensitivity map identifies areas from very low to very high archaeological potential (see **Figure 4**). This inductive, correlative model highlights zones with environmental factors linked to known archaeological sites, rather than predicting site presence with certainty (Judge and Sebastian 1988; Sebastian and Judge 1988:8; Kohler and Parker 1986). Sensitivity models are widely used in cultural resource management and CEQA planning as practical tools for guiding surveys and mitigation where data for true predictive models are lacking.

The Del Mar archaeological sensitivity model was built by integrating multiple GIS layers—known site proximity, water proximity, slope, soil/landform characteristics, and modern disturbance—each reclassified to a uniform scale and weighted by its relative importance, using a transparent multi-criteria overlay approach. The methodology is rooted in standard spatial analysis techniques and informed by regional archaeological knowledge. The result is a composite map highlighting areas with environmental profiles similar to known archaeological sites (and where human occupation would have been favorable) while accounting for where sites are likely to have survived intact. As a planning tool, this sensitivity model guides environmental review under CEQA by delineating which parts of Del Mar are most sensitive for

buried cultural resources, thereby supporting informed decision-making to avoid or mitigate potential impacts to these non-renewable resources (Taylor 2018; Judge and Sebastian 1988).

5.2.1 Data Sources and Variables

The sensitivity model incorporated several key spatial variables reflecting natural landscape features, soil/geomorphic context, and land use disturbance. These were chosen based on the following regional prehistoric settlement patterns and factors affecting site preservation.

5.2.2 Distance to Known Precontact Sites

All recorded prehistoric archaeological sites in and around Del Mar (from the California Historical Resources Information System records) were used to create a proximity raster. Using ArcGIS Euclidean distance, the distance to the nearest known site was calculated for each cell. The assumption is that areas near known sites have elevated potential for additional (possibly as-yet-unrecorded) cultural deposits, due either to favorable environmental conditions or spatial clustering of past human activities. **Table 8** under "Weights and Scoring of Variables" presents the assigned weights and the scoring scheme (based on a 1–5 scale) for the distance-to-site raster.

These breakpoints reflect a decaying influence of known sites with distance; for example, locations within approximately one or two football fields of a known site were rated very high sensitivity, whereas beyond 1 kilometer (the maximum in-City distance observed was approximately 1,314 meters) the influence was minimal. The specific thresholds were informed by professional judgment and examination of site clustering in the area (e.g., many known sites in coastal California tend to occur in proximity rather than isolated beyond a kilometer).

5.2.3 Distance to Water

Proximity to fresh water or the coastline is a well-established predictor of prehistoric site location in California (people favored living near water for access to resources). Natural water bodies including the Pacific Ocean shoreline, the San Dieguito River and Lagoon, and any significant streams or springs in Del Mar were compiled into one feature class. A Euclidean distance raster was generated from these water features. **Table 8** under "Weights and Scoring of Variables" presents the assigned weights and the scoring scheme (based on a 1–5 scale) for the distance-to-water raster.

Because Del Mar is a small city bounded by water features, even the farthest point is approximately 956 meters from water; thus, the distance classes cover a relatively short range. The highest sensitivity was assigned to areas immediately adjacent to water (within 100 meters, roughly a one-minute walk) and progressively lower scores for farther distances—recognizing that in this coastal context, nearly all areas are within reasonable reach of water, but closer locations (e.g., overlooking the lagoon or along creek terraces) would have been especially attractive for prehistoric habitation.

5.2.4 Slope (Terrain Steepness)

A 1/3-arcsecond Digital Elevation Model (DEM) was used to derive a percent slope raster (vertical rise divided by horizontal run, times 100) using the Spatial Analyst Slope tool. Slope influences site favorability (flat surfaces are easier to camp or build on) and post-depositional site integrity (steep slopes tend to erode, removing or redistributing archaeological materials). **Table 8** under "Weights and Scoring of

Variables" presents the assigned weights and the scoring scheme (based on a 1–5 scale) for slope values, which were classified using natural breaks in the slope distribution.

In practical terms, this scheme assigns highest sensitivity to flat or nearly flat areas (0–7% slope) such as coastal terraces and valley floors, which were ideal for past settlement and also conducive to preserving site stratigraphy. Moderately sloping areas get intermediate scores, while very steep slopes (greater than 57%, or roughly greater than 30 degrees) are least likely to contain intact sites (both because they would have been less utilized and because any archaeological deposits could be destroyed or not accumulate on such slopes).

5.2.5 Soil and Geomorphology

To assess the potential for buried archaeological deposits, soil data from the Natural Resources Conservation Service's Soil Survey Geographic Database were analyzed, extracting eight attributes per soil map unit: geomorphic setting, drainage class, hydric rating, flood frequency, slope range, taxonomic order, hydrologic group, and erosion K-factor. Each attribute was reclassified to a 1–5 sensitivity scale based on its relevance to site presence or preservation. For example, stable alluvial terraces with good drainage and low flood risk were rated high, while steep, eroded, marshy, or frequently flooded areas were rated lower. Weights were assigned to each attribute reflecting their importance: geomorphic setting (30%), drainage (20%), hydric rating (10%), flood frequency (10%), slope range (5%), taxonomic order (10%), hydrologic group (10%), and erosion K-factor (5%). These reclassified rasters were combined into a composite soil sensitivity score for each unit, then rounded to an integer (1–5) to produce the final sensitivity layer. This approach highlights well-drained late Quaternary alluvial terraces as high sensitivity and deemphasizes less favorable landforms like steep hills or wetlands. **Table 8** under "Weights and Scoring of Variables" presents the assigned weights and the scoring scheme (based on a 1–5 scale) for soil and geomorphology.

5.2.6 Land Use/Modern Disturbance

Modern development and ground disturbance significantly affect the preservation and detectability of archaeological resources. The SanGIS current land use dataset was used as a proxy for disturbance intensity, with each land use category assigned a sensitivity score from 1 (heavily disturbed) to 5 (undisturbed). **Table 8** under "Weights and Scoring of Variables" presents the assigned weights and the scoring scheme (based on a 1–5 scale) for current land use/modern disturbance.

Natural open spaces such as parks, preserves, beaches, and undeveloped land received a score of 5 (highest sensitivity) due to minimal soil disruption. Low-intensity recreation or rural uses, like golf courses and passive parks, were scored 4, reflecting minor disturbance. Typical residential areas were assigned a score of 3, acknowledging moderate disturbance from construction but some intact areas remain. Light commercial and mixed-use developments received a score of 2, indicating substantial disturbance, while heavy urban infrastructure and industry were scored 1 due to extensive excavation and paving. The disturbance layer was added to the model to account for the likelihood of site preservation, adjusting sensitivity where landforms have been altered by development.

5.2.7 Weights and Scoring of Variables

Table 8 presents the variables used, their assigned weights in the overlay, and the scoring schema for each (based on a 1–5 scale).

TABLE 8: VARIABLES IN DEL MAR ARCHAEOLOGICAL SENSITIVITY MODEL – WEIGHTS AND SCORING

Variable	Weight in Model	Reclassification to Sensitivity Score (1 = Lowest, 5 = Highest)
Distance to Known Precontact Sites (Euclidean distance to nearest recorded prehistoric site)	40%	5: 0–150 meters (very near known site) 4: 151–400 meters 3: 401–700 meters 2: 701–1000 meters 1: more than 1000 meters away
Distance to Water (distance to ocean, lagoon, or perennial stream)	20%	5: 0–80 meters (immediate proximity to water source) 4: 80–200 meters 3: 200–300 meters 2: 300–450 meters 1: more than 450 meters (furthest approximately 610 meters)
Slope (percent grade from DEM)	10%	5: 0%–6.8% (flat to nearly flat terrain) 4: 6.8%–18.3% (gentle slopes) 3: 18.3%–34.5% (moderate slopes) 2: 34.5%–56.7% (steep slopes) 1: more than 56.7% (very steep)
Soil/Landform Composite (integrates geomorphology, drainage, etc.)	20%	5: Highly conducive landform/soil (e.g., level terraces, well-drained young alluvium; low flood risk) 4: Favorable with slight limiting factor (e.g., gentle slope or minor periodic flooding) 3: Moderate conditions (average soil, some slope or wetness) 2: Marginal conditions (poor drainage, frequent flooding, or eroding slope) 1: Unsuitable context (e.g., extremely rocky or waterlogged soils, very unstable landform)
Land Use/Modern Disturbance (present-day land use category as proxy for ground disturbance)	10%	5: Undisturbed natural land (open space, preserve, beach, lagoon, vacant land) 4: Low disturbance recreation/rural (parks, golf courses, rural large-lot residential) 3: Moderate disturbance residential (single- and multi-dwelling unit residential areas) 2: Substantial disturbance mixed urban (commercial offices, low-rise retail, hotels) 1: Heavy disturbance/infrastructure (major commercial, industrial, roads, utilities, civic hubs)

5.2.8 Model Execution

All raster layers were prepared to a common spatial resolution and extent (1 meter cell size, covering the entire City) and aligned (using the DEM as the snap raster). ArcGIS Pro's weighted overlay tool was used to combine the standardized rasters. The weights in **Table 8** were input to the overlay, with the soil composite contributing 20% of the final score, known site proximity contributing 40%, water contributing 20%, slope contributing 10%, soil contributing 20%, and disturbance contributing 10%. Each input raster was on a 1–5 integer scale, enabling the overlay tool to simply multiply each cell's value by the weight factor and sum the results. The weighted overlay produces a raster with each cell containing a calculated sensitivity score. Because of the weighting and rounding, most output values fell within 1–5 to produce the five sensitivity classes. The final map was reviewed to ensure it aligned with professional expectations (e.g., known archaeological site locations generally fell within areas the model labeled high or very high, providing a basic validation).

5.2.9 Sensitivity Versus Predictive Model

It is important to note that this approach produces a sensitivity model, not a deterministic predictive model. The terminology follows common practice in cultural resource management: a "predictive model" in archaeology often implies a rigorous, quantitative prediction of site occurrence based on theory-driven

variables and usually requires extensive testing of accuracy (Kohler and Parker 1986). In contrast, a "sensitivity model" identifies areas that should be treated as sensitive (likely to contain resources) based on correlations of known sites with environmental factors, without asserting a firm prediction that sites *will* be found there (Judge and Sebastian 1988). The term "sensitivity" was used to communicate the inherent uncertainty and to emphasize that these are zones of elevated potential or concern, not guaranteed site locations. As Sebastian and Judge (1988) observed, fully explanatory models of site location are extremely challenging to build and validate in practice; thus, planners often favor simpler, empirical models that highlight high potential areas given what is already known. Our weighted overlay method is an inductive, correlative approach that falls squarely in that tradition (it assumes that prehistoric sites are more likely to be found in environmental settings similar to those of recorded sites, but does not attempt to explain *why* in human behavioral terms).

5.2.10 Precontact Archaeological Sensitivity Model Results

The GIS-based precontact archaeological sensitivity model was developed and executed to identify areas within the City where ground-disturbing activities associated with the CIP may intersect with moderate to high archaeological or tribal cultural sensitivity. The model integrates multiple spatial datasets including previously recorded site locations, proximity to natural features (e.g., lagoon margins, creeks, and coastal bluffs), topographic slope, soil types, and land disturbance history. The model was run using a weighted overlay approach, assigning higher sensitivity values to areas with environmental characteristics historically associated with prehistoric and historic site occurrence.

The preliminary sensitivity map generated by the model (see **Figure 4**) delineates four archaeological sensitivity zones: very low, low, moderate, and high. These zones are intended to guide project-level cultural resource screening and mitigation planning.

- **High Sensitivity Zone:** This zone is concentrated along the San Dieguito River and Lagoon margins, coastal bluff edges, and undeveloped open space parcels adjacent to natural drainages. These areas correspond with known site clusters and environmental conditions conducive to prehistoric occupation and burial. CIP projects intersecting this zone will require preconstruction survey, tribal consultation, and archaeological monitoring.
- **Moderate Sensitivity Zone:** This zone includes inland canyon edges, older residential neighborhoods with limited prior grading, and transitional zones between developed parcels and natural features. These areas may contain buried or obscured cultural deposits not previously recorded. CIP activities in this zone, such as utility trenching or park improvements, should be evaluated for monitoring or subsurface testing on a case-by-case basis.
- **Low Sensitivity Zone:** This zone encompasses heavily urbanized corridors, previously graded parcels, and areas with deep fill or artificial surfaces. This zone is unlikely to contain intact cultural deposits. CIP projects in this zone may proceed with standard discovery protocols unless new information arises.
- **Very Low Sensitivity Zone:** This zone includes areas where prior ground disturbance has been so extensive that virtually no intact native soils remain. These areas are typically locales dominated by major infrastructure or earthwork—for example, heavily engineered corridors (railroad alignments or highway rights-of-way), sites of deep artificial fill, or large commercial/industrial parcels that have been completely graded and paved. In such highly disturbed contexts, the

likelihood of encountering any preserved archaeological deposits is negligible. Consequently, CIP projects this zone can generally proceed with only standard inadvertent discovery protocols in place (i.e., a stop-work and evaluation procedure for any unexpected finds) as a precaution. No special surveys or monitoring would typically be required in these areas unless new information emerges to warrant otherwise, given the extremely low potential for intact cultural resources.

The sensitivity model provides a programmatic framework for anticipating cultural resource concerns across the CIP footprint. It is not intended to replace project-specific field investigations or tribal consultation, but rather to inform early planning and mitigation tier assignment. The model can be updated as new site data becomes available or as additional field studies are conducted.



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Legend

Project Site

Precontact Archaeological Sensitivity Zones

- 5 - High Sensitivity
- 4 - Moderate Sensitivity
- 3 - Low Sensitivity
- 2 - Very Low Sensitivity

CITY OF DEL MAR CIP STREAMLINING PROJECT
PROGRAMMATIC CULTURAL & PALEONTOLOGICAL RESOURCES ASSESSMENT

Michael Baker INTERNATIONAL

0 0.25 0.5 Miles

Source: Esri, ArcGIS Online, City of Del Mar, San Diego County

Archaeological Sensitivity Zones

Figure 4

5.3 Built Environment

The City has a Historic Preservation Ordinance and have designated certain buildings as local historic landmarks. These data, along with the results from the records search from the SCIC were used to generate a built environment sensitivity model. **Figure 5** shows the locations of the built environment resources identified from the combined sources and their presumed eligibility status. **Table 9** lists the nine designated Historic Preservation landmarks identified under the Historic Preservation Ordinance, and **Figure 6** provides locational data based on the City's Historic Preservation Overlay.

TABLE 9: CITY OF DEL MAR HISTORIC PRESERVATION LANDMARKS

Del Mar Historic Preservation Landmark	Address	APN (if applicable)
Powerhouse Building and Smokestack	1638 Coast Blvd	2992302500
Railroad Depot	15th Street	2992302700
Historic Home	1726 Coast Blvd	2992320600
Rockhouse	410 15th Street	2992805500
Hotel Del Mar Guest Cottage	110 15th Street	2993100300
Stratford Square	1438 Camino del Mar	3000120400
Old St. James Church (Library)	1309 Camino del Mar	3000200600
Public Walkway (Gunthers)	N/A	N/A
Torrey Pines Road Overhead (PCH) Bridge (Bridge 57C0207)	Pacific Coast Highway south of Carmel Valley Road	Caltrans Local Bridge No. 57C0207

PCH = Pacific Coast Highway



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Legend

- Project Site

Built Environment Buildings Ineligible

- Ineligible

Built Environment Structures and Objects

- Ineligible
- Ineligible, but locally important

Historic Addresses

- 1S Listed in the CR
- 3S Appears Eligible
- 6Y Ineligible

CITY OF DEL MAR CIP STREAMLINING PROJECT
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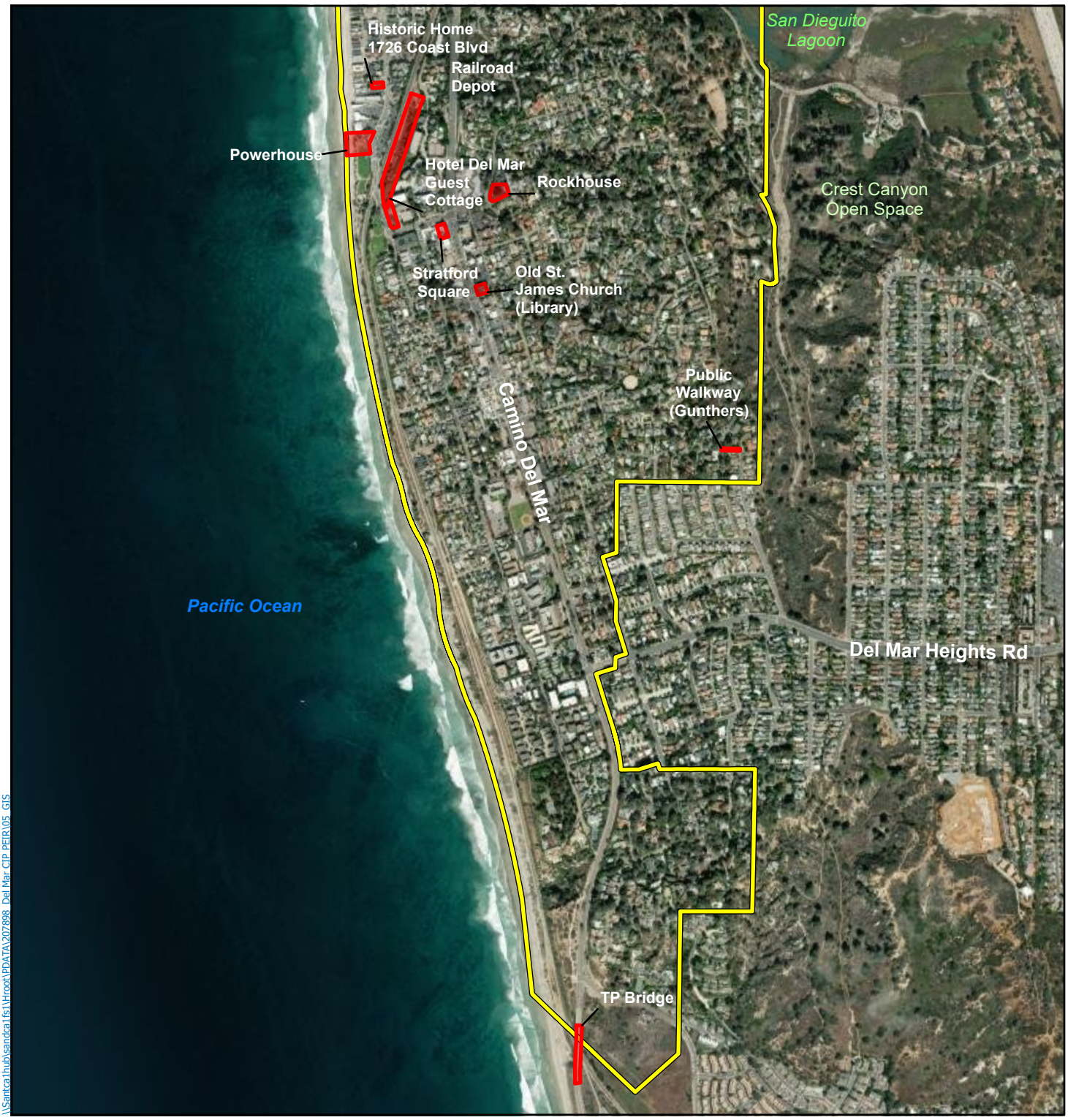
Michael Baker INTERNATIONAL

0 0.25 0.5 Miles

Source: Esri, ArcGIS Online, City of Del Mar, San Diego County

SCIC Recorded Built Environment Resources

Figure 5



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Legend

- Project Site
- Del Mar Historic Preservation Overlay

CITY OF DEL MAR CIP STREAMLINING PROJECT
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Michael Baker INTERNATIONAL

0 650 1,300 US Feet

Del Mar Historic Preservation Overlay

Source: Esri, ArcGIS Online, City of Del Mar, San Diego County

Figure 6

5.4 Paleontological Resources

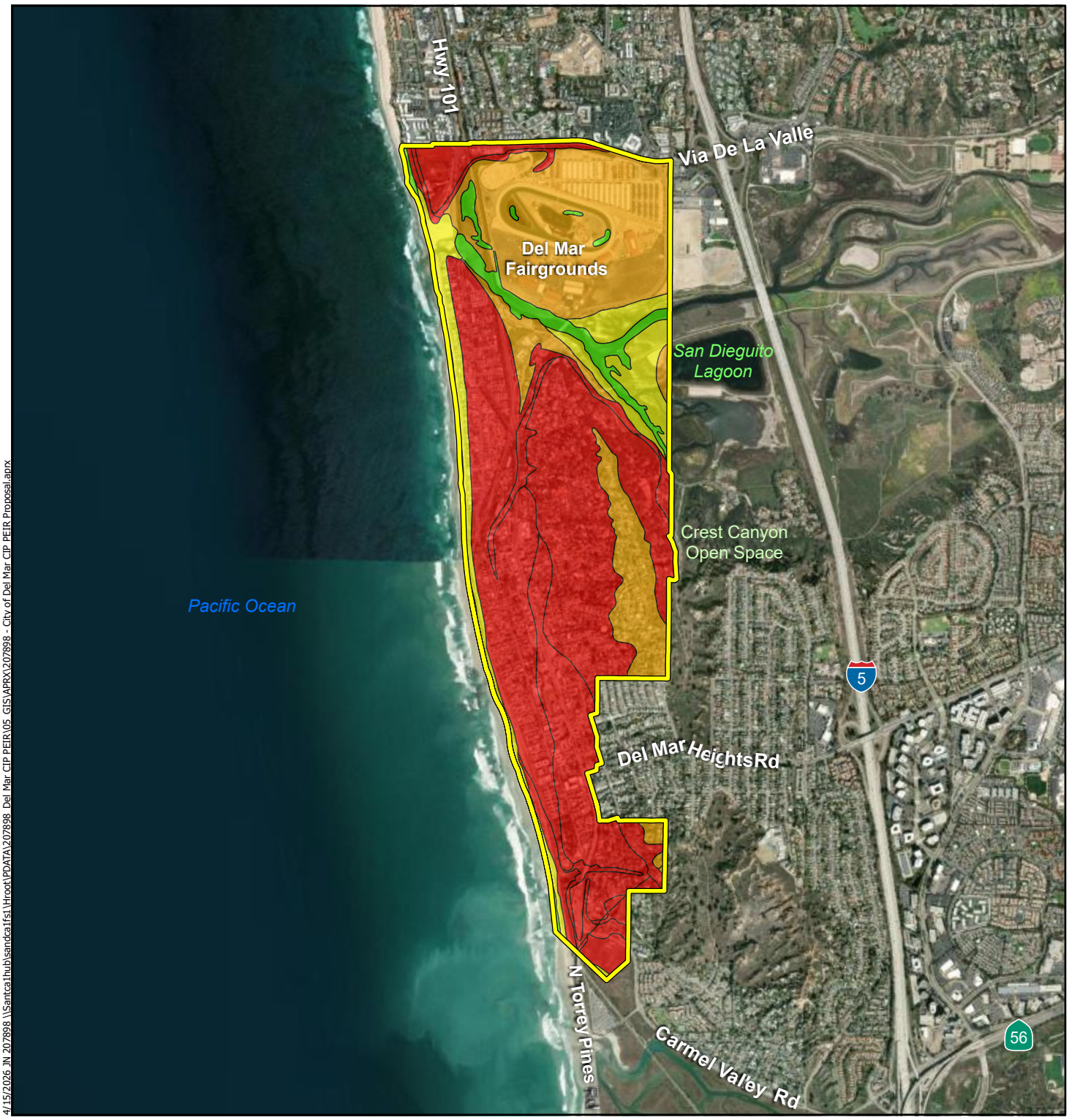
The paleontological sensitivity analysis for the City was developed using a GIS-based approach grounded entirely in the mapped geologic units from the 2008 Geologic Map of the San Diego 30' x 60' Quadrangle (California Geological Survey Regional Geologic Map RGM-3, 1:100,000 scale; Kennedy and Tan 2008). This methodology relies on the principle that the fossil-bearing potential of a given area is primarily determined by the age, lithology, and depositional environment of the geologic formations present at or near the surface.

To begin, the geologic unit shapefiles from the Kennedy and Tan map (2008) were imported into ArcGIS Pro and clipped to the boundaries of the City. Each polygon was attributed with its formal unit label, geologic age, and descriptive lithology. These attributes formed the basis for assigning paleontological sensitivity ratings of high, moderate, low, or no sensitivity. This four-tiered classification is based on the guidelines established by the Society of Vertebrate Paleontology (SVP 2010), which emphasize that any geologic unit known to contain significant fossils anywhere within its extent should be considered sensitive throughout its mapped area.

- **High sensitivity** was assigned to Delmar Formation (Td), Torrey Sandstone (Tt), and the late to middle Pleistocene-aged paralic deposits ($Qop_{2–4}$, Qop_{6}), which are for previously yielding scientifically significant fossils in the City. These formations are known regionally for yielding vertebrate and invertebrate fossils and are considered to have high potential for additional discoveries.
- **Moderate sensitivity** was assigned to Middle Pleistocene very old paralic deposits ($Qvop_{11}$) and Holocene to late Pleistocene Young alluvial floodplain deposits (Qya), which have previously yielded scientifically significant fossils but not in the City.
- **Low sensitivity** was assigned to Holocene-aged geologic units, including marine beach deposits (Qmb) and estuarine deposits (Qpe), because their young age makes fossil preservation unlikely.
- **No sensitivity** was assigned to Artificial fill (af) and water polygons, as they do not represent natural geologic formations and lack any in situ fossil potential.

The sensitivity ratings were added as a new attribute field within the GIS layer and symbolized using a standardized color scheme to support visual interpretation and integration into CIP planning workflows. This sensitivity layer serves as a screening tool for identifying areas where ground-disturbing activities may intersect fossil-bearing formations and where mitigation measures, such as paleontological monitoring, may be warranted under CEQA.

It is important to note that this model does not incorporate additional spatial variables such as depth to bedrock, prior disturbance, slope, or proximity to known fossil localities. Instead, it provides a baseline sensitivity map based solely on surface geology. While future iterations may integrate these factors to enhance predictive accuracy, the current methodology remains consistent with SVP guidance and regional best practices for paleontological resource management. **Figure 7** shows the results of the paleontological sensitivity analysis.



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Legend

Project Site

Paleontological Resources Sensitivity Zones

- High
- Moderate
- Low
- No Paleontological Resources Sensitivity Zones

CITY OF DEL MAR CIP STREAMLINING PROJECT
PROGRAMMATIC CULTURAL & PALEONTOLOGICAL RESOURCES ASSESSMENT

Michael Baker INTERNATIONAL

0 0.25 0.5 Miles

Source: Esri, ArcGIS Online, City of Del Mar, San Diego County

Paleontological Sensitivity Map

Figure 7

6.0 SUMMARY OF POTENTIAL EFFECTS AND RECOMMENDED PROTECTION MEASURES

Table 10 summarizes the potential effects to archaeological, built environment, and paleontological resources associated with the CIP projects based on existing site conditions, as well as a summary of protection measures to avoid or minimize effects. This information is intended to be used within the PEIR impact analyses and future project-specific evaluations.

TABLE 10: SUMMARY OF POTENTIAL EFFECTS AND PROTECTIONS

Existing CIP Site Conditions	Potential Effects	Summary of Protection Measures
Archaeological Resources		
Site is wholly within low and/or very low archaeological sensitivity zones as depicted in Figure 4.	Ground-disturbing construction activities in these zones are unlikely to encounter undiscovered archaeological resources. Impacts would be less than significant.	Construction contracts would be required to include an Unexpected Discovery Clause. If an unexpected discovery is made, the find must be evaluated by a qualified professional archaeologist.
Site is wholly and/or partially within moderate or high archaeological sensitivity zones as depicted in Figure 4.	Ground-disturbing construction activities in moderate and high archaeological sensitivity zones could encounter undiscovered archaeological resources. If encountered, impacts could be potentially significant.	Preconstruction archaeological resource evaluation and a cultural resources monitoring program would be required. A qualified archaeologist shall conduct an archaeological survey to evaluate the presence of cultural resources and the need for project-specific impact mitigation by preservation, relocation, or other methods. Additionally, during ground-disturbing constructions activities, a cultural resources monitoring program shall be conducted to provide for the identification, evaluation, treatment, and protection of any cultural resources that are affected by or may be discovered during project construction. Monitoring shall consist of the full-time presence of a qualified archaeologist and a traditionally and culturally affiliated Native American monitor. Ground-disturbing activities include vegetation removal, clearing, grading, trenching, excavation, or other activities that may disturb the ground.
Built Environment Resources		
No known built environment resources (shown on Figures 5 and 6) and no structures 50 years of age or older on site.	No potential to cause a substantial adverse change in the significance of a built environment resource.	Basic built environment resource screening to confirm absence.
No known built environment resources (shown on Figures 5 and 6); however, structure(s) on site are (or could potentially be) 50 years of age or older.	Potential changes to the original integrity and context of a known built environment resource. Additionally, structures 50 years of age or older have the potential to be built environment resources and could be impacted.	Preconstruction built environment resource review would be required to determine age of onsite structure(s). A qualified architectural historian shall conduct a formal survey, recordation, and CRHR evaluation.

TABLE 10, CONTINUED

Existing CIP Site Conditions	Potential Effects	Summary of Protection Measures
Known built environment resources occur on site, including those shown on Figures 5 and 6 as well as any structures 50 years of age or older that are determined to be a built environment resource.	Potential changes to the original integrity and context of a known built environment resource.	If the structure is determined to be a built environment resource, any proposed alteration shall follow mitigation guidelines contained in CEQA Guidelines Section 15126.4(b). Mitigation standards may include, but are not limited to avoidance and preservation, conducting alterations in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties (including as applicable, standards for Preservation, Rehabilitation, Restoration and Reconstruction), and documenting resources. The approach to comply with these standards shall be prepared by an Architectural Historian or Historic Architect and provided to the City.
Paleontological Resources		
Site is wholly within low and/or no paleontological sensitivity zones as depicted in Figure 7.	Ground-disturbing construction activities in these zones are unlikely to encounter paleontological resources.	Construction contracts would be required to include a stop-work clause in the event that any unexpected discovery is made. If an unexpected discovery is made, the find must be evaluated by an SVP-qualified paleontologist per CEQA Statute and State Law.
Site is wholly and/or partially within moderate or high paleontological sensitivity zones as depicted in Figure 7, and ground-disturbing activities would occur wholly within previously disturbed sediments (i.e., fill soil).	Ground-disturbing construction activities in previously disturbed sediments, such as beneath existing roadways and utility corridors, are unlikely to encounter paleontological resources.	Construction contracts would be required to include a stop-work clause in the event that any unexpected discovery is made. If an unexpected discovery is made, the find must be evaluated by an SVP-qualified paleontologist per CEQA Statute and State Law.
Site is wholly and/or partially within moderate or high paleontological sensitivity zones as depicted in Figure 7, and ground-disturbing activities would occur within Delmar Formation (Td), Torrey Sandstone (Tt), late to middle Pleistocene-aged paralic deposits ($Qop_{2–4}$, Qop_{6}), Middle Pleistocene very old paralic deposits ($Qvop_{11}$), and/or Holocene to late Pleistocene Young alluvial floodplain deposits (Qya).	Ground-disturbing construction activities within Delmar Formation (Td), Torrey Sandstone (Tt), late to middle Pleistocene-aged paralic deposits (Qop_{2-4}, Qop_{6}), Middle Pleistocene very old paralic deposits ($Qvop_{11}$), and/or Holocene to late Pleistocene Young alluvial floodplain deposits (Qya) could encounter paleontological resources, typically occurring 5 to 10 feet below ground surface.	During earthwork affecting the aforementioned geological units, a paleontological resource mitigation monitoring program would be conducted, and would include paleontological sensitivity training to all construction personnel, monitoring of ground-disturbing activities, review of boring and drilling of deep holes, and completion of daily written monitoring logs, and final paleontological mitigation report.

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APPENDIX A

CHRIS/INFORMATION CENTER RECORDS SEARCH RESULTS

CONFIDENTIAL BOUND SEPARATELY

APPENDIX B

NAHC CORRESPONDENCE AND TRIBAL CONTACT LIST

Michael Baker
INTERNATIONAL

We Make a Difference

September 10, 2025

Laura Miranda
California Native American Heritage Commission
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
nahc@nahc.ca.gov

Re: Cultural Resources Inventory for the Del Mar PEIR Project, Del Mar, California

Dear Chairperson Miranda,

Michael Baker International is conducting a cultural resources inventory for the proposed Del Mar PEIR Project in Del Mar, CA. The cultural resources inventory will be conducted in compliance with the California Environmental Quality Act. The City's Capital Improvement Program (CIP) is a 10-year capital planning program comprising many small-to-medium infrastructure projects including utility undergrounding, water and sewer line upgrades, storm drain improvements, roadway rehabilitation, and facility repairs. CIP projects will not occur in undisturbed open space areas such as coastal lagoons or preserves, which limits potential impacts on intact archaeological sites.

Michael Baker International will conduct a cultural resources records search of the project area and a 0.5-mile search radius surrounding it at the South Coastal Information Center (SCIC), a Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search, literature, historic map and aerial photo review, local historical society consultation, an archaeological pedestrian survey, and an archaeological sensitivity analysis of the project site.

We would also like to request a list of Native American tribes that may have knowledge of cultural resources in the project area or who may wish to be notified of the investigation. Please submit your response to me via e-mail at rachel.garcia@mbakerintl.com.

Sincerely

Rachel Garcia

Rachel Garcia, MA
Archaeologist
rachel.garcia@mbakerintl.com

Your Requested Information:
County – San Diego
USGS Quad – Del Mar OE W
Township and Range – T14S R4W, Sec 2,11,14,23

Attachments: 1. 1:24,000 Scale Location Map of Project Area



Michael Baker INTERNATIONAL

0 0.25 0.5 Miles

Project Location

Source: Esri, ArcGIS Online, Lancaster West USGS 7.5-Minute topographic quadrangle maps: *Del Mar, California*

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: Del Mar PEIR Project

County: San Diego County

USGS Quadrangle Name: Del Mar OE W

Township: 14S **Range:** 4W **Section(s):** 2,11 & 14, 23

Company/Firm/Agency: Michael Baker International

Street Address: 5050 Avenida Encinas Suite 260

City: Carlsbad, CA **Zip:** 92008

Phone: (760) 603-6251

Fax:

Email: rachel.garcia@mbakerintl.com

Project Description:

The City's Capital Improvement Program (CIP) is a 10-year capital planning program comprising many small-to-medium infrastructure projects including utility undergrounding, water and sewer line upgrades, storm drain improvements, roadway rehabilitation, and facility repairs. Notably, CIP projects will not occur in undisturbed open space areas such as coastal lagoons or preserves, which limits potential impacts on intact archaeological sites. Because the CIP encompasses a variety of project types, the PEIR uses four "representative" projects to bracket the range of project scale and characteristics.

From: Green, Andrew@NAHC
To: Garcia, Rachel
Subject: EXTERNAL: Del Mar PEIR Project
Date: Wednesday, September 17, 2025 11:11:47 AM
Attachments: AB52 No Del Mar PEIR Project 9.17.2025.pdf
Del Mar PEIR Project 9.17.2025.xlsx

EXTERNAL EMAIL

Good morning,

Attached is the response to the project referenced above. If you have any additional questions, please feel free to contact me directly.

Regards,

Andrew Green
Native American Heritage Commission
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
Andrew.Green@nahc.ca.gov
Direct Line: (916) 573-1072
Office: (916) 373-3710

NATIVE AMERICAN HERITAGE COMMISSION

CHAIRPERSON
Reginald Pagaling
Chumash

VICE-CHAIRPERSON
Buffy McQuillen
Yokayo Pomo, Yuki, Nomlaki

SECRETARY
Isaac Bojorquez
Ohlone-Costanoan

PARLIAMENTARIAN
Wayne Nelson
Luiseño

COMMISSIONER
Sara Dutschke
Miwok

COMMISSIONER
Stanley Rodriguez
Kumeyaay

COMMISSIONER
Bennae Calac
Pauma-Yuima Band of Luiseño Indians

COMMISSIONER
Vacant

COMMISSIONER
Vacant

ACTING EXECUTIVE SECRETARY
Michelle Carr

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

September 17, 2025

Rachel Garcia
Michael Baker International

Via Email to: Rachel.Garcia@mbakerintl.com

Re: Tribal Consultation Under CEQA, Del Mar PEIR Project, San Diego County

To Whom It May Concern:

Pursuant to your request, attached is a consultation list of tribes that are traditionally and culturally affiliated with the geographic area of the above-listed project. Additionally, a search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed based on the information submitted for the above referenced project. The results were negative. Be aware that tribes do not always record their sacred sites in the SLF, nor are they required to do so. As such, an SLF search is not a substitute for consultation with all tribes that are traditionally and culturally affiliated with a project's geographic area. Please contact all of the listed tribes as they may have information about sacred sites within the project area that is not listed with the NAHC.

Additionally, the NAHC recommends that agencies include with their notification letters, information regarding any cultural resources assessment that has been completed on the area of potential effect (APE), such as:

1. The results of any record search that may have been conducted at an Information Center of the California Historical Resources Information System (CHRIS), including, but not limited to:

- A listing of any and all known cultural resources that have already been recorded on or adjacent to the APE, such as known archaeological sites;
- Copies of any and all cultural resource records and study reports that may have been provided by the Information Center as part of the records search response;
- Whether the records search indicates a low, moderate, or high probability that unrecorded cultural resources are located in the APE; and
- If a survey is recommended by the Information Center to determine whether previously unrecorded cultural resources are present.

2. The results of any archaeological inventory survey that was conducted, including:

- Any report that may contain site forms, site significance, and suggested mitigation measures.

All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure in accordance with Government Code section 6254.10.

3. The result of the Sacred Lands File check conducted through the Native American Heritage Commission.

4. Any ethnographic studies conducted for any area including all or part of the APE; and

5. Any geotechnical reports regarding all or part of the APE.

Lead agencies should be aware that records maintained by the NAHC and CHRIS are not exhaustive and a negative response to these searches does not preclude the existence of a tribal cultural resource. A tribe may be the only source of information regarding the existence of a tribal cultural resource, which is why consultation is vital.

This information will aid tribes in determining whether to request formal consultation. If consultation is requested, having the information beforehand will help to facilitate the process.

If you receive notification of a change of address or phone number from a tribe, please inform the NAHC. With your assistance, we can assure that our consultation list remains current.

If you have any questions or require additional information, please contact me at Andrew.Green@nahc.ca.gov.

Sincerely,



Andrew Green
Cultural Resources Analyst

Attachment

Native American Heritage Commission
Native American Contact List
San Diego County
9/17/2025

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	1095 Barona Road Lakeside, CA, 92040	(760) 489-0329		buncelaw@aol.com	Diegueno	Imperial,San Diego	7/25/2023
Campo Band of Diegueno Mission Indians	F	Daniel Tsosie, THPO	36190 Church Road, Suite 1 Campo, CA, 91906	(619) 760-6480		dtsosie@campo-nsn.gov	Diegueno	Imperial,San Diego	5/24/2024
Campo Band of Diegueno Mission Indians	F	Ben Dyche, Vice Chairperson	36190 Church Road, Suite 1 Campo, CA, 91906	(619) 478-9046		bdyche@campo-nsn.gov	Diegueno	Imperial,San Diego	5/24/2024
Campo Band of Diegueno Mission Indians	F	Marcus Cuero, Chairperson	36190 Church Road, Suite 1 Campo, CA, 91906	(619) 478-9046		marcuscuero@campo-nsn.gov	Diegueno	Imperial,San Diego	5/15/2024
Ewiiaapaayp Band of Kumeyaay Indians	F	Eduardo Mercado, Principle, Grey Wolf Monitoring	1 Crestwood Road Boulevard, CA, 91905	(619) 301-4794		emercado75@hotmail.com	Kumeyaay	Imperial,San Diego	8/26/2025
Iipay Nation of Santa Ysabel	F	Clint Linton, Director of Cultural Resources	P.O. Box 507 Santa Ysabel, CA, 92070	(760) 803-5694		clint@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
La Posta Band of Diegueno Mission Indians	F	Eric La Chappa, Chairman	8 Crestwood Road Boulevard, CA, 91905	(619) 478-2113	(619) 478-2125	ELaChappa@lptribe.net	Diegueno	Imperial,San Diego	5/7/2025
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,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		Diegueno	Imperial,San Diego	
Pauma Band of Luiseno Indians	F	Lucia Majel, Pauma Cultural Resource Project Manager	P.O. Box 369 Pauma Valley, CA, 92061	(760) 742-1289		crm@Pauma-nsn.gov	Luiseno	Los Angeles,Orange,Riverside,San Bernardino,San Diego,Ventura	8/1/2025
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	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	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	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 Pasqual Band of Diegueno Mission Indians	F	Allen Lawson, Chairperson	P.O. Box 365 Valley Center, CA, 92082	(760) 749-3200	(760) 749-3876		Diegueno	Imperial,San Diego	
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 Resources Code and Section 5097.98 of the Pub Resources Code.

This list is only applicable for consultation with Native American tribes under Public Resources Code Sections 21080.3.1 for the proposed Del Mar PEIR Project, San Diego Count

Record: PROJ-2025-005215
Report Type: AB52 GIS
Counties: San Diego
NAHC Group: All

APPENDIX C

PALEONTOLOGICAL RECORDS SEARCH RESULTS

CONFIDENTIAL BOUND SEPARATELY

APPENDIX D

CONFIDENTIAL SITE MAPS
(SEPARATE, RESTRICTED ACCESS)