



Archaeological Survey Report for the Cleveland Avenue Residential Project Escondido, California

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NATIONAL ARCHAEOLOGICAL DATABASE INFORMATION

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USGS Quadrangle Map: 7.5-minute, Valley Center, 1996; Rincon Del Diablo Land Grant

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Acronyms and Abbreviations

APE	Area of Potential Effect
BP	Before Present
CEQA	California Environmental Quality Act
City	City of Escondido
CRHR	California Register of Historic Resources
GIS	geographic information system
GPS	Global Positioning System
NAHC	Native American Heritage Commission
NETR	Nationwide Environmental Title Research
Ogden project	Ogden Environmental and Energy Services Cleveland Avenue Residential Project
RECON	RECON Environmental, Inc.
SCIC	South Coastal Information Center
USGS	U.S. Geological Survey

Management Summary

This report details the methods and results of the positive archaeological survey for the Cleveland Avenue Residential Project (project). The 10.38-acre project area is located in the city of Escondido, California, approximately 1.5 miles east of Interstate 15. The project is bounded by residential uses to the east, residential and agricultural uses to the north, Conway Drive to the west, and Cleveland Avenue to the south. The project would develop 29 residential units (26 market rate and 3 affordable) with an internal access road connecting to both Cleveland Avenue and Conway Drive. All construction activities and temporary staging areas would be located within the 10.38-acre project parcel.

The archaeological survey was undertaken in accordance with requirements of the City of Escondido (City) to avoid significant impacts to cultural resources under the California Environmental Quality Act (CEQA). A RECON Environmental, Inc. (RECON) archaeologist performed the cultural resources survey of the approximately 10.38-acre project area on May 29, 2025. Prior to the survey, a records search with a one-mile radius buffer of the project area was requested from the California Historical Resources Information System, South Coastal Information Center (SCIC). RECON contacted the Native American Heritage Commission requesting a search of their Sacred Lands File to identify spiritually significant and/or sacred sites or traditional use areas, and to provide a list of local Native American tribes, bands, or individuals who may have concerns about the project. A response letter from the Native American Heritage Commission was received on April 16, 2025, indicating that their Sacred Lands File search results were positive.

One previously recorded historic-era resource (P-37-012547, a historic trash scatter) was identified within the area of potential effect (APE) during the archaeological survey. RECON recommends P-37-012547 not significant. No other significant or potentially significant prehistoric or historic cultural resources were observed during the survey of the APE. Therefore, the project would not adversely affect known historical resources. The APE has been fully disturbed by past agricultural ground disturbing activities, such as periodic discing and mowing. Because the files at the SCIC did indicate previously recorded archaeological cultural resources in the APE and its vicinity, and because the project would require subsurface grading beyond the levels of previous disturbance, a construction monitoring program is recommended as a mitigation measure to reduce potential impacts to undiscovered significant archaeological deposits or features.

1.0 Introduction and Project Description

This report details the methods and results of the positive archaeological survey for the Cleveland Avenue Residential Project (project). The 10.38-acre project area is located in the city of Escondido, California, approximately 1.5 miles east of Interstate 15 on accessor parcel number 224-151-51-00 (Figure 1). The project area occurs within the Rincon Del Diablo Land Grant, of the U.S. Geological Survey (USGS) 7.5-minute series, Valley Center quadrangle (Figure 2). The project is bounded by residential uses to the east, residential and agricultural uses to the north, Conway Drive to the west, and Cleveland Avenue to the south (Figure 3). The project would develop 29 residential units (26 market rate and 3 affordable) with an internal access road connecting to both Cleveland Avenue and Conway Drive. All construction activities and temporary staging areas would be located within the 10.38-acre project parcel.

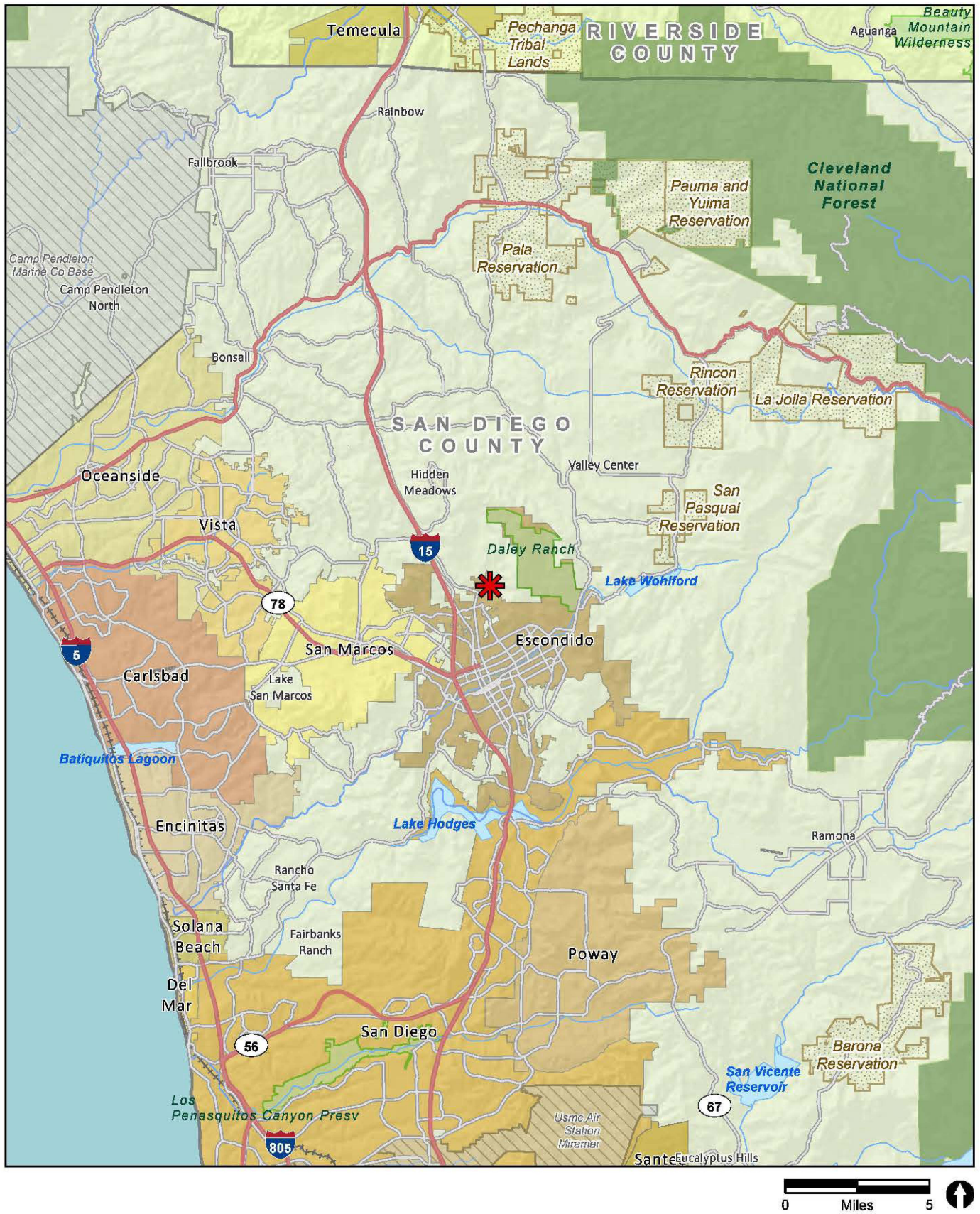
1.1 Project Personnel

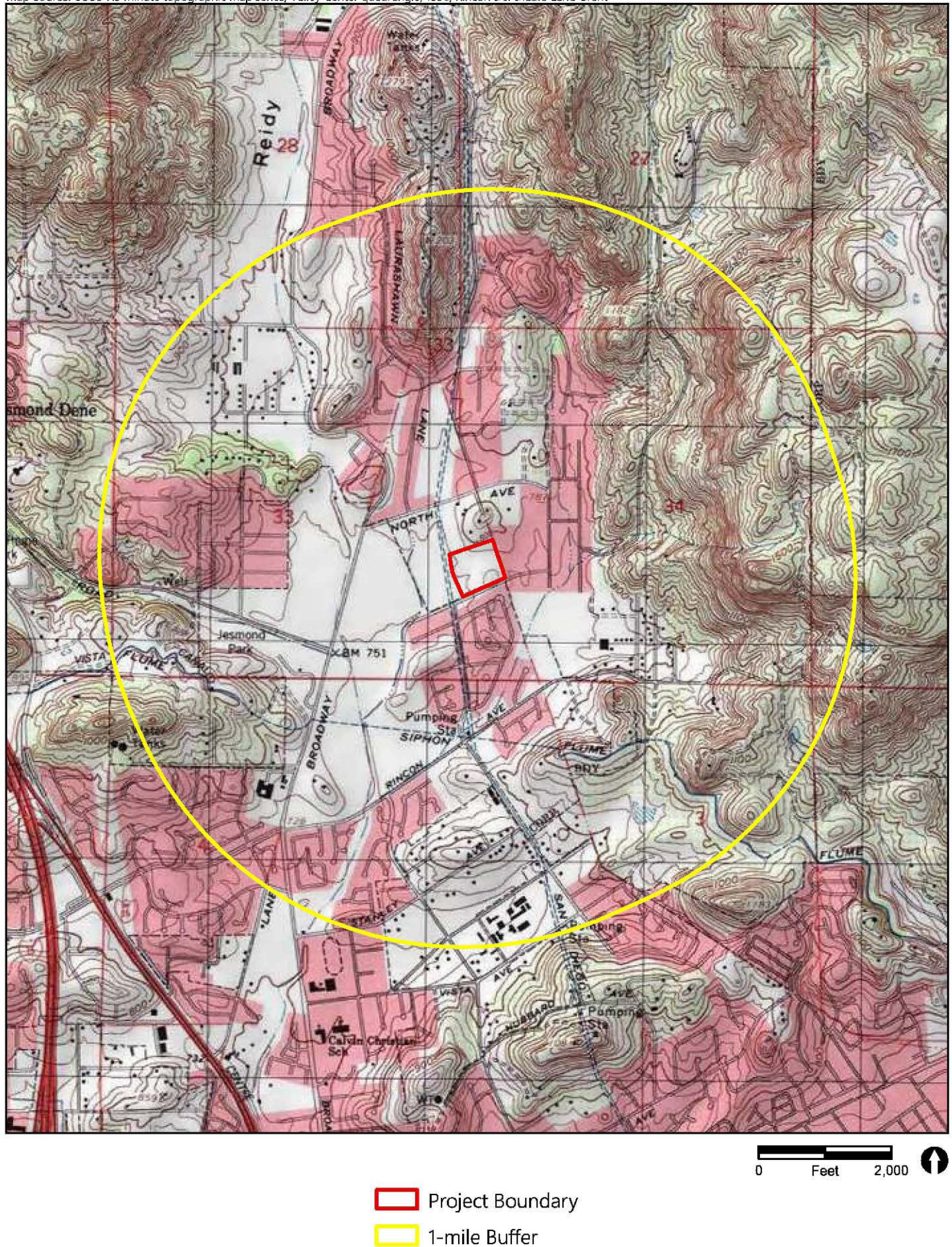
Carmen Zepeda-Herman, M.A., RPA, served as principal. Ms. Zepeda-Herman meets the Secretary of the Interior Standards for Archaeology and Historic Preservation. Ms. Zepeda-Herman earned a Master of Arts degree in Anthropology from San Diego State University and is a Registered Professional Archaeologist. She has over 24 years of field experience involving prehistoric resources in southern California and the Southwest region. Nathaniel Yerka, B.A., served as field archaeologist and report author. Stacey Higgins oversaw copyediting. Benjamin Arp and Mauro Guevara managed the geographic information system (GIS) data and performed the GIS data analysis.

2.0 Setting

2.1 Natural Setting

The approximately 10.38-acre area of potential effect (APE) is situated 0.24 miles east of a channelized portion of Escondido Creek in northern Escondido. The project APE consists of a fenced vacant and disturbed agricultural field. The APE is located within an urban environment, surrounded by residences and roads on all sides. The adjacent parcel to the northwest of the APE exhibits a single-family residence with both developed and undeveloped areas, and non-native grassland. The APE generally slopes to the west-southwest. Elevations within the project APE range between 758 feet above mean sea level near the southwest project APE corner and 790 feet above mean sea level near the northeast project APE corner. Four soil types as mapped by the U.S. Department of Agriculture occur within the APE and include Fallbrook sandy loam, Greenfield sandy loam, Placentia sandy loam, and Reiff fine sandy loam.







 Project Boundary

FIGURE 3
Project Location on Aerial Photograph

The Fallbrook soil series consists of deep, well drained soils that formed in material weathered from granitic rocks. These soils are located on rolling hills and have slopes of 5 to 75 percent. Fallbrook sandy loams have a surface layer of brown sandy loam about 8 inches thick, reddish-gray brown sandy clay loam or loam subsoil, down to decomposed granitic rock at a depth of about 41 inches. The Greenfield soil series consists of deep, well drained soils that formed in moderately coarse and coarse textured alluvium derived from granitic and mixed rock sources. Greenfield soils occur on alluvial fans and terraces and have slopes of 0 to 30 percent. Placentia Sandy Loams are moderately well-drained sandy loams with a sandy clay subsoil that form in granitic alluvium. A typical profile has a surface layer of brown, medium to slightly acid sandy loam approximately 13 inches thick. The subsoil is brown, moderately alkaline sandy clay/sandy clay loam about 40 inches thick. The substrate is yellowish-brown, moderately alkaline sandy clay loam. The Reiff soil series consists of very deep, well drained soils formed in coarse to medium textured alluvium that is weathered from mixed sources. Reiff soils occur on flood plains and alluvial fans with slopes that range between 0 and 9 percent (U.S. Department of Agriculture 1973).

2.2 Area of Potential Effect

The entire 10.38-acre project parcel is considered the APE.

2.3 Cultural Setting

The prehistoric cultural sequence in San Diego County is generally divided into three basic periods: the late Pleistocene/early Holocene dated between about 12,000 and 8,000 Before Present (BP) and manifested by the San Dieguito Complex (Erlandson et al. 2007), the Middle Holocene from approximately 8,000 to 4,000 BP and manifested by the cobble and core technology of the La Jolla Complex (True 1958, 1980); and the Late Holocene lasting from approximately 4,000 BP to historic contact (A.D. 1769) and represented by the Cuyamaca and San Luis Rey complexes in San Diego County (Moratto 1984; True 1966). This latest complex is marked by the appearance of ceramics, small arrow points, and cremation burial practices (True 1966).

2.3.1 Late Pleistocene/Early Holocene (12,000-8,000 BP)

Paleo-Indian Period is the term given to human occupation during the Late Pleistocene/Early Holocene. The earliest part of the Paleo-Indian Period is represented by the Clovis Complex, characterized by the Fluted Point Tradition. Lanceolate bifaces with edge-ground concave bases and at least one central flake-scar running from the bottom to the tip of the biface characterize the artifact assemblage. However, the dates for these points are problematic in the Great Basin and California because no fluted points in California have been associated with radiocarbon dates nor found in association with Pleistocene fauna (Rondeau et al. 2007).

The San Dieguito Complex is more widely represented in San Diego County during the Early Holocene than the Clovis Complex. The San Dieguito assemblage consists of well-made scraper planes, choppers, scraping tools, crescentics, elongated bifacial knives, and leaf-shaped points. The San Dieguito Complex is thought to represent an early emphasis on hunting (Warren et al. 1998). The C.W. Harris Site (CA-SDI-149) is the most thoroughly investigated San Dieguito component in

San Diego County and has an artifact assemblage similar to that of the Lake Mojave Complex of the Mojave Desert (Moratto 1984; Warren et al. 1998).

Human occupation before the Paleo-Indian Period has been a point of controversy by many researchers (Erlandson et al. 2007). Some archaeologists argue that a Californian pre-Clovis occupation existed, citing several sites within the Mojave and Colorado deserts, including the Yuha Pinto Wash, Lake Manix, Calico Hill, and China Lake sites (Davis et al. 1980). The archaeological community distrusted the early radiocarbon dates assigned to the sites because they came from questionable materials (Erlandson et al. 2007; Sutton et al. 2007). Recently, dates from Chile (the Monte Verde site dating to 12,500 BP), from Oregon (the Paisley Caves dating to 12,300 BP), and the Northern Channel Islands off the coast of Santa Barbara, California (Arlington Man dating to 10,900 BP and Daisy Cave dating to 10,700 BP) are changing the skepticism of pre-Clovis occupation in California (Erlandson et al. 2007; Jenkins 2012).

2.3.2 Middle Holocene (8,000–4,000 BP)

The La Jolla Complex of the Archaic Period is the coastal San Diego County manifestation of the widespread Millingstone Horizon. Archaic assemblages in interior northern San Diego County have been designated as the Pauma Complex. The La Jolla and Pauma complexes have very similar assemblages and are thought to be different environmental adaptations of the same culture (True 1958). Because of the warmer and drier conditions, the Middle Holocene brings an apparent shift toward a more generalized economy and an increased emphasis on seed resources, small game, and shellfish. Along with an economic focus on gathering plant resources, the settlement system appears to have been more sedentary. Coastal cultures gradually increased their use of marine foods and shellfish as sea levels began to rise at the end of the Early Holocene, creating more productive bays and estuaries (Byrd and Raab 2007). The La Jollan assemblage is dominated by rough, cobble-based choppers and scrapers, manos, slab and basin metates, and flexed human burials (inhumations; Warren et al. 1998). Elko and Pinto-like projectile points appeared late in the period (Warren et al. 1998). Large deposits of marine shell at coastal sites argue for the importance of shellfish gathering during the Middle Holocene (True 1980). Pauma Complex sites are typically found on terraces or ridges above a water source such as a stream. They often do not have discernible midden development, but they may have subsurface deposits. While they typically have numerous portable metates and manos, they lack bedrock milling, mortars, and pestles (True and Waugh 1981).

During the latter part of this period, estuaries and bays began to fill with sediment owed to the rise, and later stabilization, of the rise in sea levels, resulting in a reduced shellfish population (Masters and Gallegos 1997). The degree of silting in of the major bays and rivers along the San Diego coastline varied so that there was continuous occupation of the San Diego Bay, Peñasquitos Lagoon, San Elijo Lagoon, Las Flores Creek, and San Mateo Creek through to the Late Holocene. Recent data has altered the idea that the coast was abandoned or occupied seasonally after sea level rise. Evidence of wide-reaching trade networks from the coast to the western edges of the Great Basin and north to central Oregon has been found through the presence of Olivella grooved rectangular beads, pushing the extended trade network before the Late Holocene as previously thought (Byrd and Raab 2007; Raab and Howard 2000; Jenkins and Erlandson 1997).

2.3.3 Late Holocene (After 4,000 BP)

The late prehistoric archaeology of the San Diego coast and foothills, beginning approximately 1,500 years ago, is characterized by two major complexes: the Cuyamaca and the San Luis Rey. This period is characterized by higher population densities and elaborations in social, political, and technological systems (Gallegos 2002; Moratto 1984). Economic systems diversify and intensify during this period, with the continued elaboration of trade networks, the widespread use of shell-beads, and the appearance of more labor-intensive but effective technological innovations (Gamble and King 2011; McDonald and Eighmey 1998). Burial practices changed from inhumations to cremations and paddle and anvil pottery and smaller projectile points (bow and arrows) are introduced. Other cultural traits include rock art and an increase in bedrock milling inland (Byrd and Raab 2007; Gallegos 2002). The Late Holocene also brought about resource intensification on more costly or labor-intensive resources (Byrd and Raab 2007). This is highlighted in the high quantities of smaller shellfish such as *Donax* sp., smaller fish like nearshore schooling fish, and small land mammals (rodents and rabbits) in coastal northern San Diego County (Byrd and Reddy 2002).

Archaeology of the San Diego coast and foothills during the Late Holocene is characterized by the Cuyamaca Complex. It is primarily known from the work of D.L. True (1970) at Cuyamaca Rancho State Park. The Cuyamaca Complex is characterized by the presence of steatite arrowshaft straighteners, steatite pendants, steatite comales (heating stones), Tizon Brown Ware pottery, ceramic figurines reminiscent of Hohokam styles, ceramic "Yuman bow pipes," ceramic rattles, miniature pottery, various cobble-based tools (e.g., scrapers, choppers, and hammerstones), bone awls, manos and metates, mortars and pestles, and Desert Side-Notched (more common) and Cottonwood Series projectile points (True 1970).

The San Luis Rey Complex was based primarily on excavations near Pala and thought to represent the ancestors of the ethnographic Luiseño (True 1966, 1970), who arrived in northern San Diego County as part of the large series of coastward migrations of Shoshonean speakers, sometimes called the Takic Wedge (Meighan 1954; Waugh 1986). San Luis Rey I is characterized by slab metates and mortars, both of which can be found in shaped and unshaped, bedrock and portable configurations. Cremations, bone awls, and stone and shell ornaments are also prominent in the material culture. In the San Luis Rey II assemblage, pottery cooking and storage vessels, cremation urns, and polychrome pictographs appear. Chipped stone arrowpoints are dominated by the Cottonwood Triangular series but Desert side-notched, Dos Cabezas serrated, leaf-shaped, and stemmed styles also occur.

2.3.4 Ethnohistory

The APE is within the traditional territory of the Luiseño. The Luiseño are Shoshonean or Uto-Aztecan-speaking populations that are found in northern San Diego, southern Orange, and southeastern Riverside counties from the onset of ethnohistoric times through the present day. The Luiseño are linguistically and culturally related to the Gabrielino and the Cahuilla and appear to be the direct descendants of Late Prehistoric populations. Historically, the Luiseño social structure was the clan triblet. The triblet was composed of patrilineally related people who were politically and economically autonomous from neighboring triblets. Unlike other Takic-speaking tribes that surrounded them, the Luiseño do not appear to have been organized into exogamous moieties

(descent groups that married outside one's birth group) but may have been loosely divided into mountain-oriented groups and ocean-oriented groups (Bean and Shipek 1978). One or more clans would reside together in a village (Oxendine 1983). A heredity village chief held a position that controlled economic, religious, and warfare powers (Bean and Shipek 1978).

A wide variety of plants growing in the various biotic communities between the coast and mountains were utilized by the Luiseño, including acorns, annual grasses, seeds, yucca, sage, chia, lemonade berry, manzanita, and other wild greens and fruits (Kroeber 1925). These resources become available at different times of the year, which prompted moves to different campsites. In addition to plant-associated moves, trips to coastal camps to exploit marine resources such as shellfish, fish, and marine mammals took place. Animal resources used by the Luiseño included most of the mammals occurring in their territory, except for predator animals and tree squirrels (Bean and Shipek 1978). Reptiles were also avoided as a food source.

2.3.5 Historic Period

The Spanish Period in California (1769–1821) represents a time of European exploration and settlement. San Diego was first settled by Spanish colonists in A.D. 1769, when the Mission San Diego de Alcalá and Presidio de San Diego were founded. The Spanish Period economy was based on cattle grazing. Missions were major population centers, and mission cattle roamed freely over open range, tended by Native American vaqueros. European contact substantially and pervasively stressed the social, political, and economic fabric of Native American culture (Shipek 1988, 1991). Disease, starvation, and a general institutional collapse caused emigration, birth rate declines, and high adult and infant mortality levels for the local Native American groups in San Diego County (Shipek 1991).

During the Mexican Period (1822–1848), the mission system was secularized by the Mexican government, allowing for the use of these lands to dramatically expand the rancho system. The southern California economy became increasingly based on cattle ranching (Smythe 1908). The Mexican Period ended when Mexico signed the Treaty of Guadalupe Hidalgo on February 2, 1848, concluding the Mexican American War (1846–1848; Rolle and Verge 2008). A great influx of Americans and Europeans followed the discovery of gold in northern California in 1848. California became a state in 1850 (Rolle and Verge 2008).

American settlement in southern California was slow during the Gold Rush, when northern California experienced a dramatic population explosion (Rolle and Verge 2008). By the late 1800s, the county witnessed the beginnings of a recognizable downtown San Diego area and the gradual development of a number of outlying communities, many of which were established around previously defined ranchos and land grants. These communities were composed of an aggregate of people who lived on scattered farmsteads tied together through a common school district, church, post office, and country store (Hector and Van Wormer 1986, Pourade 1963).

In 1857, Judge O. S. Witherby acquired the title to Rancho Rincon del Diablo in the Escondido Valley from the children of Alvarado, who had died along with his wife, about 1850 (Pourade 1969). Judge Witherby ran the rancho until 1868, when he sold the entire rancho to Edward McGeary and Mathew, John, and Josiah Wolfskill (Pourade 1969). The land was next purchased by a group of Stockton businessmen in 1883. Two years later, the Escondido Land and Town Company, owned by R. A., J. R.,

and C. E. Thomas, acquired the ranch and began to plat a town-site and subdivide the neighboring land into various tracts (Pourade 1969).

The founders of Escondido laid out the west side for small farms where families raised fruit, hay, grapes, or vegetables. The plots were often block-size. The area's rise to the west from the valley floor provided the upper reaches with views of the town and the mountains to the east. In 1887, the Escondido Irrigation District was founded to construct a dam and reservoir to provide reliable water to the developing community (Pourade 1969). Escondido was incorporated in 1888. Wealthy mid-western families built substantial winter homes on the slopes. A sanitarium and a country hotel were erected on view lots before World War I. During World War II, the U.S. Army constructed Camp Escondido on multiple blocks of the flat area. After the war, housing was so hard to come by that many blocks were divided, enabling individuals and developers to fill the need for single-family and multifamily dwellings. State Highway 395, which is today's Centre City Parkway, cut off the west side of the city from downtown in 1949.

3.0 Previous Research

3.1 Records Search

Prior to the survey, a records search was requested on April 4, 2025, from the California Historical Resources Information System, South Coastal Information Center (SCIC) to identify any previously recorded cultural resources within a one-mile radius of the project APE. The SCIC records search indicated that there have been 43 cultural investigations conducted within one mile of the APE, three of which include the APE (Confidential Attachment 1). The record search also indicated that 23 cultural resources are recorded within one mile of the APE (Table 1). These cultural resources included 18 prehistoric sites, 3 historic resources, and 2 multicomponent (comprising both prehistoric and historic-era resources) resources. The prehistoric resources include bedrock milling features, pictographs, lithic scatters, lithic scatters including ground stone, ceramic scatters, shellfish scatters, faunal remains, and a possible hearth. The historic-era sites include a bench flume and trash scatters. The multicomponent sites include bedrock milling features, lithic scatters, a ceramic scatter, an adobe house, a single-family property, a foundation, a rock drain, and a trash scatter. No historic addresses occur within the APE. One previously recorded cultural resource occurs within the project APE.

Table 1 Previous Cultural Resources within One Mile of the Area of Potential Effect				
Primary Number	Trinomial	Age	Site Type	Recording Events
P-37-001049	CA-SDI-001049	Prehistoric	Bedrock milling features, ground stone, lithic scatter, faunal remains	1962 (True); 1985 (Robbins Wade, RBR & Assoc., Inc.)
P-37-001050	CA-SDI-001050	Prehistoric	Ground stone, lithic scatter	1962 (True)
P-37-001053	CA-SDI-001053	Prehistoric	Pictograph	1962 (True)
P-37-001054	CA-SDI-001054	Prehistoric	Ground stone, lithic scatter	1962 (True)
P-37-001055	CA-SDI-001055	Prehistoric	Bedrock milling features, lithic scatter	1962 (True); 2004 (Palette)
P-37-001056	CA-SDI-001056	Prehistoric	Ground stone, lithic scatter	1962 (True)
P-37-001057	CA-SDI-001057	Prehistoric	Ground stone, lithic scatter	1962 (True)

Table 1 Previous Cultural Resources within One Mile of the Area of Potential Effect				
Primary Number	Trinomial	Age	Site Type	Recording Events
P-37-001058	CA-SDI-001058	Prehistoric	Ground stone, lithic scatter	1962 (True)
P-37-001059	CA-SDI-001059	Prehistoric	Bedrock milling features, lithic scatter	1962 (True)
P-37-001060	CA-SDI-001060	Prehistoric	Ceramic, lithic, ground stone scatter	1962 (True); 1990 (Brian F. Mooney Associates)
P-37-003625	CA-SDI-003625	Prehistoric	Ceramic, lithic, shellfish, ground stone scatter, cremation, possible hearth	1976 (Kaldenberg)
P-37-004942	CA-SDI-004942	Prehistoric	Bedrock milling features, lithic scatter	1977 (Eckhardt)
P-37-004943	CA-SDI-004943	Prehistoric	Bedrock milling features	1977 (Eckhardt)
P-37-004944	CA-SDI-004944	Prehistoric	Ground stone, lithic scatter	1977 (W.T. Eckhardt)
P-37-011898	CA-SDI-011898	Prehistoric	Ground stone, lithic scatter	1990 (SRS)
P-37-012545	CA-SDI-012545	Multicomponent	Bedrock milling features, ceramic and lithic scatter; adobe house, house	1991 (ERCE)
P-37-012546	CA-SDI-012546	Multicomponent	Bedrock milling feature, house foundation, rock drain, historic trash scatter	1991 (ERCE)
P-37-012547	CA-SDI-012547	Historic	Trash scatter	1991 (ERCE)
P-37-012548	CA-SDI-012548	Prehistoric	Bedrock milling feature	1991 (ERCE)
P-37-015948	CA-SDI-014534	Prehistoric	Ground stone, lithic scatter	1997 (Gallegos & Associates)
P-37-017523	CA-SDI-015357	Prehistoric	Bedrock milling features, ground stone scatter	1999 (Gallegos & Associates); 2017 (Brian F. Smith & Associates)
P-37-030889		Historic	Bench flume	2009 (Stephen Van Wormer, Affinis); 2015 (Lucas Piek, Matthew DeCarlo, ASM Affiliates, Inc.)
P-37-036304	CA-SDI-022005	Historic	Trash scatter	2017 (Jillian L. Hahnen, Brian F. Smith & Associates, Inc.)
Bold text = recorded within APE				

P-37-012547 was recorded in 1991 by ERC Environmental as a possible historic house location and historic trash deposit. The recording noted a possible rock house foundation along with a trash deposit that included whiteware ceramic fragments, windowpane glass, burned roofing tile, barbed wire, wooden posts, iron fragments, a modern adobe brick fragment with adhered concrete, and a Aristocrat silverplate fork. The site area measured 82 feet north/south by 66 feet east/west. A subsequent site visit was made by Ogden Environmental and Energy Services (Ogden) in 1993 to clear up a discrepancy between the original recording and the Archaeological Survey Report prepared for the Escondido Master Plan of Parks, Trails, and Open Space concerning the presence of an adobe structure; the site visit confirmed no adobe structure. During this site visit, Ogden

contacted the landowner (Ms. Bernice Nack), living in the house adjacent to the APE that she and her husband built in 1936/37, where she confirmed her family had burned trash within the site area. Ogden then stated that P-37-012547 will require testing to determine significance per CEQA Guidelines (Anderson and Clevenger 1993).

3.2 Review of Topographic Maps and Historic Aerial Photographs

A review of topographic maps and historic aerial photographs demonstrate agricultural use by 1947. The earliest topographic map available at Nationwide Environmental Title Research (NETR) Online dates to 1893 and does not include any disturbance within or adjacent to the APE until the 1970 representation that includes an alternate alignment of the current Conway Road adjacent to the west. The 1988 topographic map represents the eastern APE boundary with the southern boundary represented in 2000, the next available map. The current alignment of Conway Drive is represented on the 2012 topographic map. The earliest aerial photograph available at NETR Online dates to 1947 and exhibits the project APE as disturbed by agriculture and interior dirt road alignments with a single-family residence occurring on the parcel adjacent to the north. The 1947 photograph also exhibits a small knoll in the northwestern quadrant of the APE, as well as the eastern, western, and southern APE boundaries possibly established by fence lines. The interior dirt roads are removed by agriculture by the 1953 photograph and the APE appears mostly unchanged in the subsequent photographs (1964, 1967, 1978, 1980, 1981, 1982, 1983, 1984, 1985, 1986, 1988, 1989, 1990, 1991, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2002, 2003, 2005, 2009, 2010, 2012, 2014, 2016, 2018, 2020, and 2022). Outside of the APE, the 1978 photograph exhibits sparse single-family residences adjacent to the east. Mass grading is exhibited adjacent to the south in the 1986 photograph, followed by planned dense single family residential development exhibited by 1988, along with the paved current alignment of Cleveland Avenue. Between 2003 and 2005, the current paved alignment of Conway Road is exhibited along with the development of the drainage swale adjacent to the west of Conway Road, and the single-family residential development adjacent to the west of the swale. No other notable changes occur adjacent to the APE in subsequent aerial photographs (2009, 2010, 2012, 2014, 2016, 2018, 2020, and 2022; Nationwide Environmental Title Research LLC 2025).

3.3 Native American Heritage Commission

A letter was sent on April 4, 2025, to the Native American Heritage Commission (NAHC) requesting a search of their Sacred Lands File to identify spiritually significant and/or sacred sites or traditional use areas in the proposed project vicinity. The NAHC was also asked to provide a list of local Native American tribes, bands, or individuals who may have concerns or interests in the cultural resources of the proposed project. A response letter from the NAHC was received on April 16, 2025, indicating that the results were positive. The NAHC also provided a list of Native American tribes who may have knowledge of cultural resources within the project APE and vicinity (Attachment 1).

3.4 Tribal Scoping Letters

Tribal scoping letters were sent via email or a hard copy letter on May 29, 2025, to the tribal list provided by the NAHC. A sample of the Tribal Scoping Letter is found in Attachment 2. RECON Environmental, Inc. (RECON) received three responses. On May 29, 2025, RECON received an automated response from Bernice Paipa representing the Sycuan Band of the Kumeyaay Nation; however, this response did not reference the current project and cited a return date that occurred nearly two years ago. Ray Teran representing the Viejas Band of Kumeyaay Indians (Viejas) on May 29, 2025, stated in part that Viejas has determined that the project site has cultural significance or ties to Viejas, that cultural resources have been located within or adjacent to the APE, and that they request that a Kumeyaay cultural monitor be on-site for ground-disturbing activities and to inform them of any new developments such as inadvertent discovery of cultural artifacts, cremation sites, or human remains. Art Bunce, tribal attorney representing the Barona Band of Mission Indians (Barona) on May 29, 2025, stated in part that due to the location, nature and scope of the project, Barona requests a copy of the cultural resources report (see Attachment 2).

4.0 Methods

The primary goal of the pedestrian investigation was to determine (1) if there are previously unrecorded cultural resources present, and if so, document the resources' locations and what they consist of, and (2) to update conditions of previously recorded cultural resources. The survey area was inspected for evidence of archaeological materials such as flaked and ground stone tools or fragments, ceramics, milling features, and human remains. The spacing between field personnel was 15 meters. When artifacts or features were identified, the spacing was reduced to three to five meters between field personnel. Photographs and field notes were taken to document the environmental setting and general conditions. The locations of observed artifacts were recorded using an Apple iPad running ESRI's ArcGIS Collector application paired with a Trimble R1 sub-meter global positioning system (GPS) unit. RECON used Field Maps for ArcGIS on a GPS-enabled tablet containing shapefiles and aerial photography to pinpoint our location in real-time, which was used to navigate the APE.

An appropriate California Department of Parks and Recreation site form update was completed for the previously recorded cultural resource identified during the survey. Completed California Department of Parks and Recreation forms will be filed with the SCIC (Confidential Attachment 2). A copy of the survey report will also be filed with the SCIC.

5.0 Survey Results

RECON archaeologist Nathaniel Yerka, accompanied by Jessica Alexander, a Luiseño Native American representative from Saving Sacred Sites, performed the archaeological resources survey on May 29, 2025. RECON identified one previously recorded historic-era resource (P-37-015247, a historic-era trash scatter; see Confidential Attachment 2) within the APE. The historic-era resource was updated by RECON.

The survey commenced in the northwest project APE corner, employing generally southeast-northwest transects that translated across the APE from west to east. The project APE consists of a gently rolling landscape that generally slopes to the west-southwest. The ground surface is covered in non-native grasses and weeds that present less than 20 percent visibility (Photographs 1 and 2). A small knoll exhibiting bedrock, accumulated rock, and other debris occurs in the northwest quadrant of the APE (Photograph 3). The APE exhibits perimeter chain-link fencing along the eastern, southern, and western boundaries with an entry/exit gate in the northwest project APE corner. A modern concrete culvert exits the APE along the western boundary to then cross beneath Conway Road. A two-foot diameter metal tank with a center bolt was observed in the northwest quadrant of the APE (Photograph 4). An overhead utility alignment runs adjacent to the eastern APE boundary and three streetlights supporting Conway Road run adjacent to the western APE boundary. Several T-posts were observed across the APE marking the location of small rock piles that present hazards to periodic discing and mowing.

5.1 Previously Recorded Resource

5.1.1 P-37-012547

RECON and Saving Sacred Sites visited the SCIC mapped location of P-37-012547 and did not observe any cultural material. However, RECON did observe cultural material similar to that listed in the 1991 recording on a small knoll located approximately 180 feet to the west within the APE. The topography of this location matches the topography and landscape description noted in the 1993 updated recording (Anderson and Clevenger 1993). Observed material covered a 79-(north/south)-by-55-(east/west)-foot area spread across a small knoll with bedrock, secondarily placed rock, burned rock, and tree stumps. Material consisted of three separate piles of various cut lengths of wooden utility poles (northern two piles intentionally split; possibly for fencing material), a 9-by-9-foot scatter of windowpane glass, a colorless glass bottle base fragment (reads "D ... / 101 ..."), melted cobalt glass fragment, melted glass tumbler rim fragment, metal paint can, metal banding (possibly for a barrel), barbed wire, wire, bed or chair spring pieces, assorted metal pieces, modern adobe brick fragments, whiteware plate or saucer fragments, with faunal material consisting of one burned *Chamidae* sp. fragment.



PHOTOGRAPH 1
Overview of APE from Southwest Project APE Corner,
Looking North-Northeast



PHOTOGRAPH 2
Overview of APE from Northeast Project APE Corner,
Looking South-Southwest



PHOTOGRAPH 3
Overview of Rocky Knoll Within Northwest Project APE Quadrant,
Looking Northwest



PHOTOGRAPH 4
A Two-Foot Diameter Metal Tank Located in the Northwest Project
APE Quadrant

6.0 Regulatory Background

6.1 California Environmental Quality Act

Cultural resources that have been evaluated and determined to be eligible for listing in the California Register of Historic Resources (CRHR) are considered historical resources under the provisions of Public Resources Code Sections 5020.1 and 5024.1. For planning purposes, all the cultural resources in the survey area that have not yet been evaluated for their eligibility to the CRHR are considered to be historical resources until evaluated, with the exception of cultural isolates.

Section 5024.1(c) of the Public Resources Code addresses California Environmental Quality Act (CEQA) significance criteria. It indicates that a resource is determined significant and may be listed as an historical resource in the California Register if it meets any of the following CRHR criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. Is associated with the lives of persons important to our past.
3. Embodies the distinctive characteristics of a type, period, construction, or represents the work of an important creative individual, possesses high artistic values.
4. Has yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting one of the above criteria, a resource must have integrity; that is, it must evoke the resource's period of significance or, in the case of criterion 4, it must retain reliable research data (California Code of Regulations Title 14, Chapter 11.5 Section 4852(c)). Most archaeological sites that qualify for listing do so under criterion 4.

If a project will cause a substantial adverse change in the significance of a historical resource, mitigation is required under CEQA. A substantial adverse change is defined as the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired. Avoidance of the historical resource through project redesign is the preferred mitigation measure. If redesign is not feasible, minimizing impacts by limiting the degree of impacts or reducing the impact through construction monitoring are mitigation options.

P-37-012547 does not qualify under criteria 1 and 2 because no significant event or person could be associated with the resource. Walter and Bernice Nack were former owners of the APE and previously lived in the residence adjacent to the APE, passing away in 1977 and 2003, respectively (Anderson and Clevenger 1993; Find a Grave 2025). According to the November 1929 edition of *The Pacific Dairy Review*, when Walter Nack was in high school, he won a Guernsey calf awarded by the Guernsey Breeders' Association (*The Pacific Dairy Review* 1929). Mr. Nack earned his Certificate in Agriculture (non-degree curriculum) from the University of California, Berkeley in 1933 (University of California, Berkeley 1933). Walter and Bernice Nack are listed in 1955 Escondido City and Rural Directory at Route 2 Box 103 with their phone number (Community Directory Company 1955). They were,

however, not listed in the County of San Diego June 1933 through June 1936 Directory (Library of Congress 1933/1936). Mr. and Mrs. Nack announced the engagement of their second daughter in the *Daily Times-Advocate* (1956). Based on this research, Mr. and Mrs. Nack do not appear to be significant people in the development of city of Escondido.

Additionally, the resource does not qualify under criterion 3 because the criterion applies to the built environment. The scatter of cultural constituents making up P-37-012547 is not a structure, building or portion thereof, so it does not exhibit the type of characteristics required for significance under this criterion. P-37-012547 does not qualify under criterion 4 because it is not likely to yield additional information beyond the recorded constituents. It is known through documented communication between Ogden and Ms. Bernice Nack—the former owner of the property—that the Nack family had previously burned trash within the site area. Therefore, the site is not likely to yield information important to history; the recording of the cultural constituents of P-37-012547 has exhausted its research potential.

6.2 City of Escondido

The determination of significance for historic resources within the city is based on age, location, context, association with an important person or event, uniqueness, and integrity under the City's Historic Resources Code (Article 40, Section 33-794, Escondido Zoning Ordinances). The City has developed the following 13 criteria to address when evaluating a possible historic resource for inclusion on the list of historic landmarks or the local historic register:

- (1) Escondido historical resources that are strongly identified with a person or persons who significantly contributed to the culture, history, pre-history, or development of the City of Escondido, region, state, or nation;
- (2) Escondido building or buildings that embody distinguishing characteristics of an architectural type, specimen, or are representative of a recognized architect's work and are not substantially altered;
- (3) Escondido historical resources that are connected with a business or use that was once common but is now rare;
- (4) Escondido historical resources that are the sites of significant historic events;
- (5) Escondido historical resources that are fifty (50) years old or have achieved historical significance within the past fifty (50) years;
- (6) Escondido historical resources that are an important key focal point in the visual quality or character of a neighborhood, street, area, or district;
- (7) Escondido historical building that is one of the few remaining examples in the city possessing distinguishing characteristics of an architectural type;
- (8) Sign that is exemplary of technology, craftsmanship or design of the period when it was constructed, uses historical sign materials and is not significantly altered;

- (9) Sign that is integrated into the architecture of the building, such as the sign pylons on buildings constructed in the Modern style and later styles;
- (10) Sign that demonstrates extraordinary aesthetic quality, creativity, or innovation;
- (11) Escondido landscape feature that is associated with an event or person of historical significance to the community or warrants special recognition due to size, condition, uniqueness or aesthetic qualities;
- (12) Escondido archaeological site that has yielded, or may be likely to yield, information important in prehistory; or
- (13) Escondido significant historical resource that has an outstanding rating of the criteria used to evaluate local register requests (Ord. No. 2000-23, §§ 4, 9-13-00).

A historical resource must meet at least two of these criteria to be eligible for inclusion on the local register of historic places or be given historic landmark status.

P-37-012547 does not meet the baseline elements in the criteria for (1) through (11). The scatter of cultural constituents making up P-37-012547 are directly linked to the Nack family, who are not identified as persons who significantly contributed to the culture, history, pre-history, or development of the city, region, state, or nation. The scatter of cultural constituents making up P-37-012547 are not a structure, building or portion thereof, so the resource does not exhibit the type of characteristics required for significance under these criteria. P-37-012547 does not qualify under criterion number (12) as the cultural constituents observed are historic-era items that are not likely to yield additional information beyond their recordation. P-37-012547 does not meet the baseline elements in criterion number (13) as the recorded cultural constituents are not likely a site that could qualify as a significant historical resource that has an outstanding rating of the criteria used to evaluate local register requests.

The City has designated a number of areas as historic districts, including the Westside Historic District. Boundaries for historic districts were determined by the Escondido Community Development Department and local residents. Criteria used in determining a potential district in Escondido include the following:

- The proposed historical district as a geographically definable area possessing a significant concentration or continuity of sites, buildings, structures, or objects unified by past events, or aesthetically by plan or physical development;
- The collective historical value of the proposed district may be greater than that of each individual resource; and
- The designation is in conformance with the purpose of the City's historic preservation provisions set forth in the City's General Plan.

P-37-012547 does not possess the foundational nominating criteria to qualify as part of a historic district.

7.0 Recommendations

One previously recorded historic-era resource (P-37-012547, a historic trash scatter) was identified within the APE during the archaeological survey. Ogden stated that P-37-012547 will require testing to determine significance per CEQA Guidelines (Anderson and Clevenger 1993). Based on the survey and research level, RECON disagrees with Ogden and recommends P-37-012547 not significant.

Per CEQA, P-37-012547 does not qualify under criteria 1 and 2 because no significant event or person could be associated with the resource. The resource does not qualify under criterion 3 because the criterion applies to the built environment. The scatter of cultural constituents making up P-37-012547 is not a structure, building or portion thereof, so it does not exhibit the type of characteristics required for significance under this criterion. P-37-012547 does not qualify under criterion 4 because due to research performed by Ogden, the site is not likely to yield information important to history; therefore, the recording of the cultural constituents of P-37-012547 has exhausted its research potential.

No other significant or potentially significant prehistoric or historic cultural resources were observed during the survey of the APE. Therefore, the project would not adversely affect known historical resources. The APE has been fully disturbed by past agricultural ground disturbing activities, such as periodic disking and mowing. Because the files at the SCIC did indicate previously recorded archaeological cultural resources in the APE and its vicinity, and because the project would require subsurface grading beyond the levels of previous disturbance, a construction monitoring program is recommended as a mitigation measure to reduce potential impacts to undiscovered significant archaeological deposits or features.

RECON recommends a qualified archaeologist and a representative from the Luiseño community be present for all ground-disturbing work to identify and evaluate any inadvertent discoveries. The program would require both archaeological and Native American monitors to attend a pre-construction meeting and to be present during ground-disturbing activities with the APE. If previously unidentified potentially significant cultural resources are discovered, construction activities should be diverted away from the discovery and the resources should be evaluated for significance. Isolates and non-significant deposits shall be minimally documented in the field. Significant archaeological discoveries include intact features, stratified deposits, and human remains. The significance of the resource will be determined by the Principal Investigator (qualified archaeologist) in consultation with the Traditional Culturally Associated Native American monitor and the City's Community Development Department Director. Construction activities would be allowed to resume after completion of the recovery of an adequate sample and recordation of features. After completion of monitoring, a report shall be prepared documenting the results.

All cultural material collected during monitoring shall be processed and conveyed to the Native American monitoring group or curated at a facility meeting federal standards per 36 Code of Federal Regulations Part 79 if the tribe does not take possession of the cultural material.

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ATTACHMENTS

ATTACHMENT 1

Native American Heritage Commission Correspondence



NATIVE AMERICAN HERITAGE COMMISSION

April 16, 2025

Carmen Zepeda-Herman
RECON Environmental, Inc.

Via Email to: czepeda@reconenvironmental.com

Re: Cleveland Avenue Project, San Diego County

To Whom It May Concern:

As requested, a record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed based on information submitted for the above referenced project. The results were positive. Please contact the San Pasqual Band of Diegueno Mission Indians on the attached list for more information. Please note that tribes do not always record their sacred sites in the SLF, nor are they required to do so. As such, a SLF search is not a substitute for consultation with all tribes that are traditionally and culturally affiliated with a project's geographic area.

Attached is a list of Native American tribes who may also have knowledge of cultural resources in the project area. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. Please contact all of those listed; if they cannot supply information, they may recommend others with specific knowledge. If within two weeks of notification, a response has not been received, the Commission requests that you follow-up with a telephone call or email to ensure that the project information was received.

If you receive notification of a change of address or phone number from a tribe, please notify the NAHC so that we can assure that our lists contain current information.

In addition to engaging in tribal consultation, you should consult the appropriate regional California Historical Research Information System (CHRIS) archaeological Information Center to determine whether it has information regarding the presence of recorded archaeological sites within the project area.

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

Sincerely,

Andrew Green
Cultural Resources Analyst

Attachment

CHAIRPERSON
Reginald Pagaling
Chumash

VICE-CHAIRPERSON
Buffy McQuillen
Yokayo Pomo, Yuki,
Nomlaki

SECRETARY
Sara Dutschke
Miwok

PARLIAMENTARIAN
Wayne Nelson
Luiseño

COMMISSIONER
Isaac Bojorquez
Ohlone-Costanoan

COMMISSIONER
Stanley Rodriguez
Kumeyaay

COMMISSIONER
Reid Milanovich
Cahuilla

COMMISSIONER
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Pauma-Yuima Band of
Luiseño Indians

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nahc@nahc.ca.gov

**Native American Heritage Commission
Native American Contact List
San Diego County
4/16/2025**

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		(760) 489-0329		buncelaw@aol.com	Diegueno	Imperial, San Diego	7/25/2023
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
Campo Band of Diegueno Mission Indians	F	Daniel Tsosie, THPO	36190 Church Road, Suite 1 Campo, CA, 91906	(619) 760-6480		dtosie@campo-nsn.gov	Diegueno	Imperial, San Diego	5/24/2024
Ewiiapaayp Band of Kumeyaay Indians	F	Robert Pinto, Chairperson	4054 Willows Road Alpine, CA, 91901	(619) 368-4382	(619) 445-9126	ceo@ebki-nsn.gov	Diegueno	Imperial, San Diego	
Ewiiapaayp Band of Kumeyaay Indians	F	Michael Garcia, Vice Chairperson	4054 Willows Road Alpine, CA, 91901	(619) 933-2200	(619) 445-9126	michaelg@leaningrock.net	Diegueno	Imperial, San Diego	
Iipay Nation of Santa Ysabel	F	Clint Linton, Director of Cultural Resources	P.O. Box 507 Santa Ysabel, CA, 92070	(760) 803-5694		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	Gwendolyn Parada, Chairperson	8 Crestwood Road Boulevard, CA, 91905	(619) 478-2113	(619) 478-2125	LP13boots@aol.com	Diegueno	Imperial, San Diego	
Manzanita Band of Kumeyaay Nation	F	Angela Elliott Santos, Chairperson	P.O. Box 1302 Boulevard, CA, 91905	(619) 766-4930	(619) 766-4957		Diegueno	Imperial, 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	
Pala Band of Mission Indians	F	Alexis Wallick, Assistant THPO	PMB 50, 35008 Pala Temecula Road Pala, CA, 92059	(760) 891-3537		awallick@palatribe.com	Cupeno Luiseno	Orange, Riverside, San Bernardino, San Diego	11/27/2023
Pala Band of Mission Indians	F	Shasta Gaughen, Tribal Historic Preservation Officer	PMB 50, 35008 Pala Temecula Road Pala, CA, 92059	(760) 891-3515		sgaughen@palatribe.com	Cupeno Luiseno	Orange, Riverside, San Bernardino, San Diego	11/27/2023
Pala Band of Mission Indians	F	Christopher Nejo, Legal Analyst/Researcher	PMB 50, 35008 Pala Temecula Road Pala, CA, 92059	(760) 891-3564		cnejo@palatribe.com	Cupeno Luiseno	Orange, Riverside, San Bernardino, San Diego	11/27/2023
Pechanga Band of Indians	F	Steve Bodmer, General Counsel for Pechanga Band of Indians	P.O. Box 1477 Temecula, CA, 92593	(951) 770-6171	(951) 695-1778	sbodmer@pechanga-nsn.gov	Luiseno	Los Angeles, Orange, Riverside, S an Bernardino, San	8/2/2023
Pechanga Band of Indians	F	Tuba Ebru Ozdil, Pechanga Cultural Analyst	P.O. Box 2183 Temecula, CA, 92593	(951) 770-6313	(951) 695-1778	eozdil@pechanga-nsn.gov	Luiseno	Los Angeles, Orange, Riverside, S an Bernardino, San	8/2/2023
Rincon Band of Luiseno Indians	F	Laurie Gonzalez, Tribal Council/Culture Committee	One Government Center Lane Valley Center, CA, 92082	(760) 484-4835		lgonzalez@rincon-nsn.gov	Luiseno	Los Angeles, Orange, Riverside, S an Bernardino, San	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		jilinton@rincon-nsn.gov	Luiseno	Los Angeles, Orange, Riverside, S an Bernardino, San	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, S an Bernardino, San	7/7/2023

**Native American Heritage Commission
Native American Contact List
San Diego County
4/16/2025**

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	5/31/2023
San Luis Rey Band of Mission Indians	N	Carmen Mojado, Secretary of Government Affairs	1889 Sunset Drive Vista, CA, 92083	(760) 917-1736		cjmojado@slrmissionindians.org	Luiseno	Orange, Riverside, San Diego	1/17/2025
San Pasqual Band of Diegueno Mission Indians	F	John Flores, Environmental Coordinator	P. O. Box 365 Valley Center, CA, 92082	(760) 749-3200	(760) 749-3876	johnf@sanpasqualtribe.org	Diegueno	Imperial, San Diego	8/16/2016
San Pasqual Band of Diegueno Mission Indians	F	Allen Lawson, Chairperson	P.O. Box 365 Valley Center, CA, 92082	(760) 749-3200	(760) 749-3876		Diegueno	Imperial, San Diego	
Soboba Band of Luiseno Indians	F	Jessica Valdez, Cultural Resource Specialist	P.O. Box 487 San Jacinto, CA, 92581	(951) 663-6261	(951) 654-4198	jvaldez@soboba-nsn.gov	Cahuilla Luiseno	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego	7/14/2023
Soboba Band of Luiseno Indians	F	Joseph Ontiveros, Tribal Historic Preservation Officer	P.O. Box 487 San Jacinto, CA, 92581	(951) 663-5279	(951) 654-4198	jontiveros@soboba-nsn.gov	Cahuilla Luiseno	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego	7/14/2023
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
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
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
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

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 Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Cleveland Avenue Project, San Diego County.

Record: PROJ-2025-002089
Report Type: List of Tribes
Counties: San Diego

ATTACHMENT 2

Tribal Scoping Letter and Tribal Responses



An Employee-Owned Company

May 29, 2025

Reference: Cleveland Avenue Residential Project, Escondido, California (RECON Number 10600.1)

Dear Native American Tribal Representative:

RECON Environmental, Inc. (RECON) has been tasked to conduct an archaeological cultural resources survey for the Cleveland Avenue Residential Project (project) located in the city of Escondido in San Diego County. The project area occurs within an unsectioned portion of the Rincon del Diablo land grant, as depicted on the Valley Center quadrangle of the U.S. Geological Survey 7.5-minute topographic map series (see attached figure). The project area is located on the northeast corner of Conway Drive and Cleveland Avenue within assessor parcel number 224-151-51-00. The project proposes the development of 29 residential units (26 market rate and 3 affordable) on a 10.4-acre project area. Project activities will include grading, construction of residential units, and construction of internal access roads.

A records search of the Native American Heritage Commission (NAHC) Sacred Lands File was requested for the proposed project vicinity and the sacred land search results from the NAHC were positive. Additionally, a records search was conducted of the archaeological databases maintained at the California Historical Resources Information System, South Coastal Information Center at San Diego State University. The files at the South Coastal Information Center indicate that one historic 1930s trash scatter has been recorded within the proposed project area. A RECON archaeologist and a Luiseño Native American representative from Saving Sacred Sites surveyed the project area on May 29, 2025; no prehistoric resources were observed.

Pursuant to the letter received in response from the NAHC, we are contacting you as a potentially interested party. We would like to know if you have any concerns regarding the project as it relates to Native American issues or interests. Would you have any information on sacred sites in the vicinity of the project that may help us advise the client to avoid impacts to these sites? We would like to obtain Native American input early enough in the environmental process to ensure adequate time to address any concerns you may have.

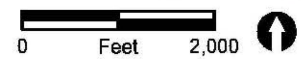
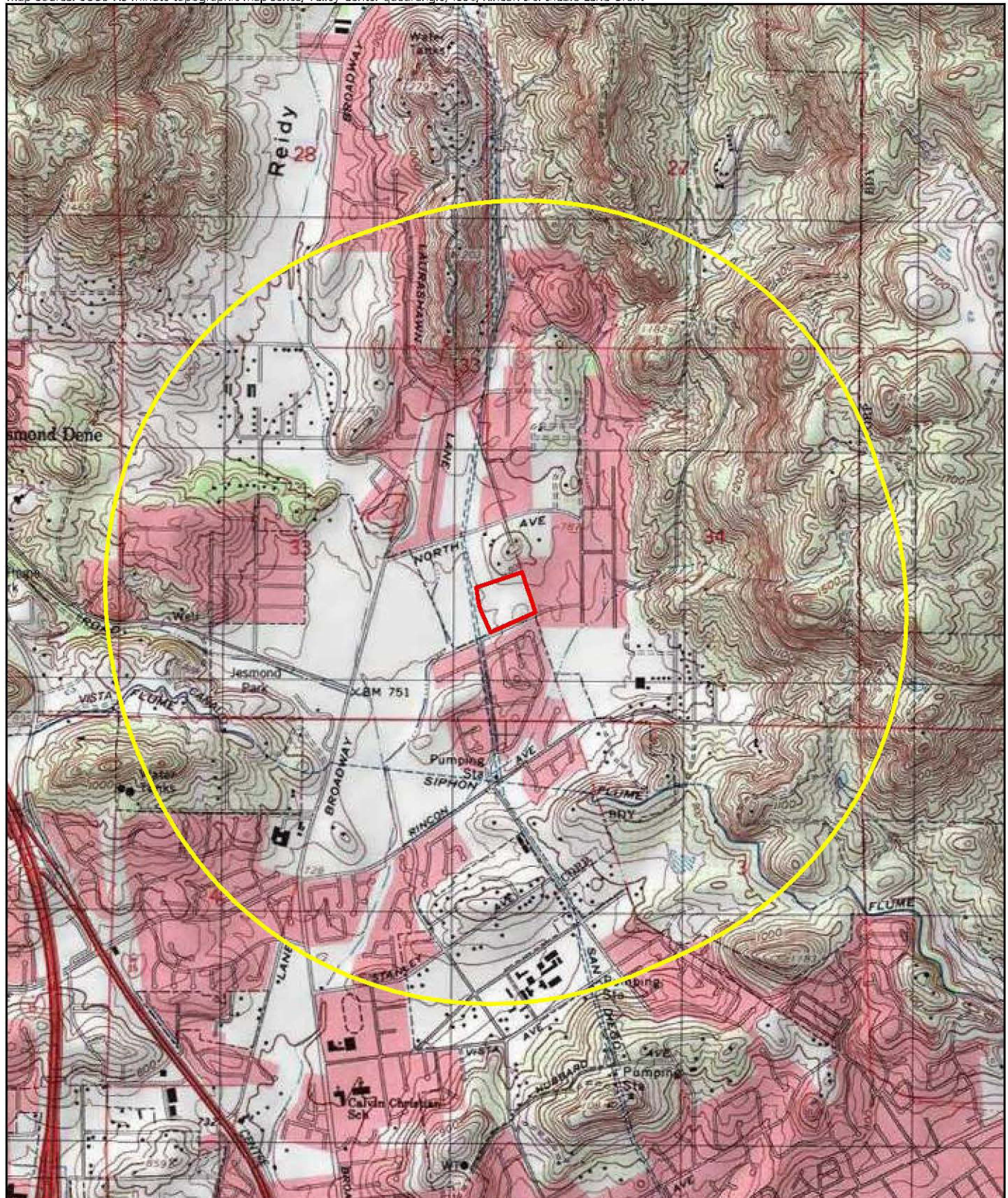
The City of Escondido is the lead agency who will conduct Assembly Bill 52 consultation. If you have questions, comments, or concerns, please contact me at 619-308-9333 extension 133 or by e-mail at czepeda@reconenvironmental.com. If we have not heard from you by June 27, 2025, we will assume that you have no comments. Thank you for your assistance.

Sincerely,

Carmen Zepeda-Herman
Principal Investigator

CZH:NDY:sh

Attachment



- Project Boundary
- 1-mile Buffer

FW: [External] Re: Cleveland Avenue Residential Project, Escondido, California (RECON Number 10600.1)

From Stacey Higgins <shiggins@reconenvironmental.com>
Date Fri 5/30/2025 11:38 AM
To Carmen Zepeda-Herman <czepeda@reconenvironmental.com>

FYI.

From: buncelaw@aol.com <buncelaw@aol.com>
Sent: Friday, May 30, 2025 11:37 AM
To: Stacey Higgins <shiggins@reconenvironmental.com>
Subject: [External] Re: Cleveland Avenue Residential Project, Escondido, California (RECON Number 10600.1)

Hello there,

Due to the location, nature, and scope of this project,. please send me a copy of the cultural resources report, when available.

Sincerely,,

Art Bunce
Tribal Attorney
Barona Band of Mission Indians

On Thursday, May 29, 2025 at 03:35:50 PM PDT, Stacey Higgins <shiggins@reconenvironmental.com> wrote:

Attached is a PDF regarding the following project: Cleveland Avenue Residential Project, Escondido, California (RECON Number 10600.1).

Please contact Carmen Zepeda-Herman (czepeda@reconenvironmental.com; 619-308-9333 extension 133) with any questions or comments.

Stacey Higgins

Senior Production Specialist



RECON Environmental, Inc.

3111 Camino del Rio North, Suite 600

San Diego, CA 92108-5726

(619) 308-9333 ext. 127

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Inbox 758



Drafts 8



Sent Items



Deleted Items 1012

Notes

3792 Lawson Valley

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Conversation Hist...

RSS Feeds

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FW: [External] Automatic reply: Cleveland Avenue Residential Project, Escondido, California (RECON Number 10600.1)



Sycuan-...e0111.png

SH

Stacey Higgins



To: Carmen Zepeda-Herman

Thu 5/29/2025 3:42 PM



You replied on Fri 5/30/2025 7:44 AM



Retention: RECON Mailbox Delete (1 year) Expires: Tue 6/2/2026 3:42 PM



FYI...auto response is two years old!!

-----Original Message-----

From: Bernice Paipa <bpaipa2@sycuan-nsn.gov>

Sent: Thursday, May 29, 2025 3:36 PM

To: Stacey Higgins <shiggins@reconenvironmental.com>

Subject: [External] Automatic reply: Cleveland Avenue Residential Project, Escondido, California (RECON Number 10600.1)

I will be out of my office July 5, 2023 to July 7, 2023. I will be back in office on July 10, 2023.

Sincerely,

Bernice Paipa

Nathanial Yerka

From: Ray Teran <rteran@viejas-nsn.gov>
Sent: Thursday, May 29, 2025 4:04 PM
To: Stacey Higgins; Carmen Zepeda-Herman; Nathanial Yerka
Cc: Ernest Pingleton
Subject: [External] RE: Cleveland Avenue Residential Project, Escondido, California (RECON Number 10600.1)

The Viejas Band of Kumeyaay Indians ("Viejas") has reviewed the proposed project and at this time we have determined that the project site has cultural significance or ties to Viejas. Cultural resources have been located within or adjacent to the APE-DE of the proposed project.

Viejas Band request that a Kumeyaay Cultural Monitor be on site for ground disturbing activities and to inform us of any new developments such as inadvertent discovery of cultural artifacts, cremation sites, or human remains.

If you wish to utilize Viejas cultural monitors (Viejas rate is \$54.15/hr. plus GSA mileage), please call Ernest Pingleton at 619-655-0410 or email, epingleton@viejas-nsn.gov, for contracting and scheduling. Thank you.

If a Tribe, having a closer proximity to the Project, requests to perform cultural monitoring, Viejas will differ to them.

From: Stacey Higgins <shiggins@reconenvironmental.com>
Sent: Thursday, May 29, 2025 3:36 PM
To: Carmen Zepeda-Herman <czepeda@reconenvironmental.com>; Nathanial Yerka <nyerka@reconenvironmental.com>
Subject: Cleveland Avenue Residential Project, Escondido, California (RECON Number 10600.1)

Attached is a PDF regarding the following project: [Cleveland Avenue Residential Project, Escondido, California \(RECON Number 10600.1\)](#)

Please contact Carmen Zepeda-Herman (czepeda@reconenvironmental.com; 619-308-9333 extension 133) with any questions or comments.

Stacey Higgins
Senior Production Specialist



RECON Environmental, Inc.
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(Not for Public Review)