

## Appendix I

# Cultural Resources Report and SHPO Concurrence Letter

# Cultural Resources Report

## Confidential under Separate Cover

## SHPO Concurrence Letter



**DEPARTMENT OF PARKS AND RECREATION  
OFFICE OF HISTORIC PRESERVATION**

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July 24, 2025

In reply refer to: BIA\_2025\_0703\_001

VIA ELECTRONIC MAIL

Mr. Ryan Hunter  
Acting Regional Director  
Bureau of Indian Affairs  
Pacific Regional Office  
2800 Cottage Way, Room W-2820  
Sacramento, CA 95825

RE: Section 106 Review – San Pasqual Fee-to-Trust Conveyance and Grocery Store Development Project, Valley Center, San Diego County, California

Dear Mr. Hunter:

The California State Historic Preservation Officer (SHPO) has received your request for review and comment under Section 106 of the National Historic Preservation Act of 1966 (54 U.S.C. § 306108), and its implementing regulations at 36 CFR Part 800. The Bureau of Indian Affairs (BIA) is requesting SHPO's comment on its finding of *no historic properties affected* for the above-referenced undertaking.

**Description of the Undertaking**

The BIA proposes to convert 8.5 acres of land from fee simple to federal trust status on behalf of the San Pasqual Band of Diegueño Indians to facilitate the development of a grocery store. The undertaking includes the conveyance of the parcels into trust, construction of a grocery store with associated parking, driveways, and infrastructure, and related ground disturbing activities.

**Area of Potential Effects (APE)**

The APE encompasses the five subject parcels on the east side of Valley Center Road, comprising approximately 8.5 acres within Sections 18 and 19 of Township 11 South, Range 1 West, San Bernardino Base Meridian. The APE includes all areas of proposed ground disturbance, including building footprints, parking, driveways, and associated infrastructure.

The submittal does not provide a defined vertical APE or detailed information regarding the depth and extent of anticipated ground disturbing activities such as grading, foundation excavation, or utility installation. The vertical dimension of the APE is an important consideration for assessing the potential to affect buried historic properties.

### **Identification Efforts**

To support its finding, the BIA relied on a cultural resources investigation prepared by Brian F. Smith & Associates (BFSA) in 2018 and revised in 2019. The study included a review of records at the South Coastal Information Center at San Diego State University for a one-mile radius around the project area, which identified 64 previously recorded cultural resources in the vicinity but none within the boundaries of the Area of Potential Effects (APE). The Native American Heritage Commission's Sacred Lands File search returned negative results, and the BIA initiated outreach to tribes identified by the Commission. Several tribes responded, including requests to review the completed report, but no tribal representatives identified known cultural resources within the APE.

In addition to archival research and consultation, BFSA conducted an intensive pedestrian survey of the 8.5-acre parcel in August 2018. The survey, completed with a Native American monitor present, reported that the property is vacant but has been moderately to severely disturbed by previous development, demolition, and staging activities. The survey identified no cultural resources within the APE, and no subsurface testing or geoarchaeological assessment was conducted as part of the study.

### **Finding of Effect**

The BIA has determined a finding of *no historic properties affected* pursuant to 36 CFR § 800.4(d)(1), concluding that no historic properties are present within the APE.

### **Comments and Recommendations**

The SHPO appreciates the BIA's submittal, and the supporting materials provided. The SHPO notes the following considerations:

- 1. Vertical APE Clarification:**

The submittal does not describe the vertical extent of the APE. In future submissions, please provide details regarding the anticipated depth of grading, foundation excavation, and utility installation to ensure the APE encompasses all potential effects on subsurface historic properties.

- 2. Subsurface Potential:**

Although the surface survey was negative, the one-mile records search revealed a high density of prehistoric sites in the vicinity. Past disturbances do not preclude the presence of deeply buried or otherwise obscured deposits.

- 3. Monitoring and Inadvertent Discoveries:**

Given the disturbed but archaeologically sensitive context, SHPO recommends that BIA have archaeological and Native American monitoring during ground disturbing activities, as initially suggested in the BFSA report. A cultural resource inadvertent discovery plan should be developed prior to construction.

4. **Survey Age:**

While the findings appear reasonable given the parcel's condition, SHPO recommends for future submissions that BIA provide justification for relying on an older report or consider updating the identification effort to confirm current conditions.

**Conclusion**

Pursuant to 36 CFR § 800.4(d)(1), SHPO **does not object** to a finding of *no historic properties affected* and has no further comments.

Be advised that under certain circumstances, such as unanticipated discovery or a change in project description, your agency may have additional future responsibilities for this undertaking under 36 CFR Part 800. If you require further information, please contact Jeffrey Delsescaux at (916) 894-5498 or [Jeffrey.Delsescaux@parks.ca.gov](mailto:Jeffrey.Delsescaux@parks.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to be 'J. Polanco', with a long horizontal line extending to the right.

Julianne Polanco  
State Historic Preservation Officer