Archaeological Survey Report for the Sunrise Senior Living Center Project, San Marcos, California and Carlsbad, California

Prepared for:

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Final

October 2026

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TABLE OF CONTENTS

Chapter Page

NATIONAL ARCHAEOLOGICAL DATABASE INFORMATION iii

EXECUTIVE SUMMARY iv

1.0 INTRODUCTION 1

1.1 PROJECT DESCRIPTION AND LOCATION 1
PROJECT DESCRIPTION 1
PROJECT LOCATION 2
1.2 REGULATORY FRAMEWORK 2
CALIFORNIA REGISTER OF HISTORICAL RESOURCES SIGNIFICANCE CRITERIA 2
CALIFORNIA ENVIRONMENTAL QUALITY ACT SIGNIFICANCE CRITERIA 3

2.0 PROJECT AREA SETTING 7

2.1 NATURAL SETTING 7
2.2 CULTURAL SETTING 7
ARCHAEOLOGICAL CONTEXT 7
ETHNOGRAPHIC CONTEXT 10
HISTORICAL CONTEXT 12

3.0 RESEARCH DESIGN 17

4.0 STUDY METHODS AND RESULTS 19

4.1 RECORD SEARCH AND LITERATURE REVIEW 19
4.2 NATIVE AMERICAN CORRESPONDENCE 24
4.3 ARCHIVAL RESEARCH 26
4.4 ARCHAEOLOGICAL SURVEY METHODS AND RESULTS 26

5.0 CONCLUSIONS AND RECOMMENDATIONS 31

MM-CR-1A: PRE-EXCAVATION AGREEMENT 31
MM-CR-1B: CONSTRUCTION MONITORING 32
MM-CR-1C: UNANTICIPATED DISCOVERY PROCEDURES 33
MM-CR-1D: HUMAN REMAINS 34

REFERENCES 37

APPENDICES .....

APPENDIX A .....
SCIC Record Search .....
CONFIDENTIAL APPENDIX B .....
NAHC SLF Request and Tribal Outreach .....

LIST OF TABLES

Page

Table 1. Previously Recorded Archaeological Sites within 1 Mile of the Project Area (Sites within Project Area are in Bold) 19
Table 2. Summary of Previous Studies Conducted within 1 Mile of the Project Area (Reports within Project Area are in Bold) 20
Table 3. Summary of Native American Correspondence 25

LIST OF FIGURES

Page

Figure 1. Project Vicinity Map 4
Figure 2. Project Location Map, USGS 7.5' Quad. 5
Figure 3. Project Area, aerial photograph. 6
Figure 4. View of the Project area from the southeast corner, facing north-northwest. Broken concrete piles are visible in the center of the photo. 27
Figure 5. View of the Project area from the northern corner, facing south. Broken concrete piles are visible in the background of the photo. 28
Figure 6. View of the Project area from the northern corner, facing south. Heavy vegetation and a concrete ditch run along the western side of the Project. 28
Figure 7. View of the Project area from the central-western side, facing southwest. A retaining wall is present in the southwestern portion of the Project. 29
Figure 8. View of the additional survey area from the southern side, facing north. 29
Figure 9. Overview of additional survey area, from abandoned portion of San Elijo Road at the eastern Project boundary, facing northwest. 30
Figure 10. Overview of additional survey area, from the northern end of the abandoned portion of San Elijo Road, facing south 30

NATIONAL ARCHAEOLOGICAL DATABASE INFORMATION

Authors: Terrence Luévano, Zandra Mikhael

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Client/Project Proponent: Sophia Mitchell & Associates

Report Date: October 2026

Report Title: Archaeological Survey Report for the Sunrise Senior Living Center Project, San Marcos, California and Carlsbad, California

Type of Study: Phase I Archaeological Survey

New Sites: none

Updated Sites: none

USGS Quad: Rancho Santa Fe USGS 7.5' Topographic Quadrangle Map in Township 12 South, Range 3 West, North ½ of Southwest ¼ of Section 29

Acreage: 2.45 acres (Project), 1.45 acres (offsite fuel modification zone)

Keywords: Rancho Santa Fe 7.5-minute quadrangle

EXECUTIVE SUMMARY

This report provides the results of an archaeological survey for the Sunrise Senior Living Center Project (Project), San Marcos and Carlsbad, California, located on Assessor Parcel Number (APN) 223-65-101 in San Marcos, San Diego County, California, and a portion of APN 223-81-202 in Carlsbad, San Diego County, California. The Project is located on approximately 2.45 acres at the northeast corner of San Elijo Road and Paseo Plomo. The report is prepared in compliance with the California Environmental Quality Act. The City of San Marcos (City) is the lead agency.

The Project proposes development of an assisted living and memory care facility with access from San Elijo Road and Paseo Plomo. The majority of the Project is located within San Marcos, and a small portion of the site is included in Carlsbad. The Project applicant is requesting approval of a Site Development Plan (SDP23-0002) to construct a two-story, 93,375-square-foot (sq. ft.) assisted living and memory care facility consisting of 92 units above 25,100 sq. ft. of below-grade parking. The Mitigated Negative Declaration is analyzing 97 units and up to 129 beds to provide flexibility for the Project applicant to respond to changing market conditions. The Project applicant also is requesting a Minor Hillside Development Permit and a Minor Habitat Management Plan Permit from the City of Carlsbad for the Project.

Additionally, the Project includes physical improvements including driveway, grading, and landscaping within a small portion of a lot located in the City of Carlsbad. The Project would include a single phase of construction. Grading includes approximately 410 cubic yards (cu. yd.) of cut and 24,700 cu. yd. of fill, for a net import of 24,290 cu. yd. The Project would also implement a zoned fire fuels management program, including for areas off site on an adjacent property.

ASM Affiliates (ASM) previously conducted an archaeological inventory and survey in 2018 under the Project's previous name, Artis Senior Living Project. The purpose of the inventory and survey was to assess potential impacts to cultural and historical resources as a result of the proposed Project on 2.18 acres of development. The archaeological inventory included a record search of the California Historical Resources Information System, a Sacred Lands File search with the Native American Heritage Commission (NAHC), Native American outreach, literature review, archival research, and archaeological pedestrian survey. No cultural resources have been previously recorded within the Project area. The 2018 record search of the Sacred Lands File held by the NAHC under previous name of the Project was negative. During a regular consultation meeting hosted by the City in May of 2024, a Pechanga Tribal community member expressed interest in visiting and walking the Project site.

ASM conducted an updated archaeological survey on February 6, 2025, for the current Project after its expansion from 2.18 acres of development to 2.45 acres. The updated archaeological survey was conducted by ASM Associate Archaeologist Larry Tift with Native American monitor John Jackson from the Pechanga Band of Indians. Ground-surface visibility within the Project area ranged from fair to poor throughout the Project area due to non-native vegetation regrowth and dumped construction debris. Visibility was fair in the central portion of the Project area and poor to very poor in the northern fifth and east and western edges of the Project area. Mr. Tift noted that the entire Project area appears to be heavily disturbed. No artifacts or features were identified during the survey. ASM conducted a follow-up survey on July 20, 2026, of an added 1.45 acre

offsite fuel modification zone. The follow-up survey was conducted by ASM Associate Archaeologist Larry Tift with Native American monitor Luke Lofton from the Pechanga Band of Indians. This additional area was observed to be situated on a steep slope that appears to have been either constructed or re-contoured by prior construction activities. No cultural resources were observed during this effort.

ASM requested a second record search of the Sacred Lands File on October 14, 2025, and received a negative response on October 20, 2025. ASM sent information request letters to tribal contacts identified in the response. ASM has received two email responses, one from the Viejas Band of Kumeyaay Indians and one from the La Posta Band of Diegueno Indians. The City conducted AB-52 consultations for the current Project with the Rincon Band of Luiseño Indians starting on October 11, 2024 (concluded December 30, 2025), and Pechanga Band of Indians starting on October 15, 2024 (City concluded consultation February 23, 2026 after lack of response by Pechanga to City Outreach). The City initiated AB-52 consultation for the current Project with the San Luis Rey Band of Mission Indians on November 8, 2024, and concluded consultation on September 17, 2025.

The archaeological survey was negative, and no archaeological resources were present. As such, the Project is not expected have an impact on archaeological resources. Although ASM did not identify any archaeological or Native American resources, the potential remains to encounter unidentified resources during Project grading activities should construction go deeper than previously disturbed depths. As a result of AB-52 consultation between the City and Traditionally and Culturally Affiliated (TCA) Native American Tribes, mitigation measures were created for grading and construction activities that occur within areas of previously unmonitored areas, as determined by a Qualified Archaeologist and a TCA Native American Monitor, as a condition of Project approval.

1.0 INTRODUCTION

This report provides the results of an archaeological survey for the Sunrise Senior Living Center Project (Project), San Marcos and Carlsbad, California, previously known as the Artis Senior Living Project, located on Assessor Parcel Number (APN) 223-65-101 in San Marcos, San Diego County, California, and a portion of APN 223-81-202 in Carlsbad, San Diego County, California. The report is prepared in compliance with the California Environmental Quality Act (CEQA).

This section, Chapter 1, of the report provides a Project description and location and regulatory framework. Chapter 2 provides a natural, cultural, and historical overview of the region. Chapter 3 provides the research design. Chapter 4 provides the methods and results of the inventory. Chapter 5 includes recommendations and conclusions.

The Project was managed by ASM Principal Investigator Terrence Luévano, MA, RPA, and the field director for the survey was ASM Associate Archaeologist Larry Tift. Mr. Luévano contributed to the report and prepared the Project maps. Senior Archaeologist Zandra Mikhael contributed to the report. Native American monitoring was provided by John Jackson and Luke Lofton from the Pechanga Band of Indians.

1.1 PROJECT DESCRIPTION AND LOCATION

PROJECT DESCRIPTION

The Project proposes development of an assisted living and memory care facility with access from San Elijo Road and Paseo Plomo. The majority of the Project is located within San Marcos, and a small portion of the site is included in Carlsbad. The Project applicant is requesting approval of a Site Development Plan (SDP23-0002) to construct a two-story, 93,375-square-foot (sq. ft.) assisted living and memory care facility consisting of 92 units above 25,100 sq. ft. of below-grade parking. The Mitigated Negative Declaration is analyzing 97 units and up to 129 beds to provide flexibility for the Project applicant to respond to changing market conditions. The Project applicant also is requesting a Minor Hillside Development Permit and a Minor Habitat Management Plan Permit from the City of Carlsbad for the Project. The Project's current General Plan designation is SPA (Specific Plan Area) and the Zoning Designation is SPA (Specific Plan Area), specifically the University Commons (Old Creek Ranch) Specific Plan Area – Senior Residential.

Additionally, the Project includes physical improvements including driveway, grading and landscaping within a small portion of a lot located in the City of Carlsbad. The Project would include a single phase of construction. Grading includes approximately 410 cubic yards (cu. yd.) of cut and 24,700 cu. yd. of fill, for a net import of 24,290 cu. yd.

The Project would also implement a zoned fire fuels management plan. Zone 0 is the ember resistant zone and extends from 0 to 5 feet from the structure. Zone 1 is between 5 and 50 feet from the proposed structure unless constrained by the property lines. Zone 2 is between 50 and up to 150 feet from the proposed structure, unless constrained by property lines. Due the small size of the Project site, the Project would also rely on offsite fuel modification zone (FMZ) equivalents. The Project would achieve 150 feet of FMZ on the south and west sides of the Project site through a combination of onsite and offsite equivalent FMZs in the form of existing non-combustible

roadways and existing infrastructure with maintained landscape and hardscape. Further, through an offsite landscape FMZ maintenance license agreement with the adjacent property owner, the Project would provide annual maintenance in the form of removing five eucalyptus trees and mowing/thinning of existing vegetation within the open space areas to the north/northeast of the Project site up to 100 feet from the property boundary.

PROJECT LOCATION

The 2.45-acre Project site is located on the northeast corner of San Elijo Road and Paseo Plomo (Figures 1–3). The majority of the Project site (2.18 acres for the proposed building) is located within the City of San Marcos (City), specifically in the University Commons Specific Plan area (APN 223-651-01-00). A smaller portion of the Project site (0.27 acres for physical improvements needed to provide access via Paseo Plomo) is located within the City of Carlsbad (APN 223-812-02-00). The site is bounded by Paseo Plomo on the west and by San Elijo Road to the south. Multi-family residential (Solaire Apartments) is located south of the Project site across San Elijo Road. The Everbrook Academy preschool and a recreation vehicle parking/storage area are located to the west of Paseo Plomo. North and east of the Project site are light industrial areas on the opposite side of San Marcos Creek.

The Project area is shown on the Rancho Santa Fe USGS 7.5' topographic quadrangle map in Township 12 South, Range 3 West, within the northern ½ of the southwest ¼ of Section 29. The Project area is currently vacant, and existing vegetation within Project area includes native and non-native grasses.

1.2 REGULATORY FRAMEWORK

Districts, sites, buildings, structures, and objects are assigned significance based on their exceptional value or quality illustrating or interpreting the heritage of San Diego, California, or the United States in history, architecture, archaeology, engineering, and culture. A number of criteria are used in demonstrating resource importance. Specifically, criteria outlined in the California Register of Historic Resources (CRHR) and CEQA provide the guidance for making such a determination. The City does not have a set of local criteria for historic designation. The following sections detail the criteria that a resource must meet in order to be determined important.

CALIFORNIA REGISTER OF HISTORICAL RESOURCES SIGNIFICANCE CRITERIA

The CRHR program encourages public recognition and protection of resources of architectural, historical, archaeological, and cultural significance; identifies historical resources for state and local planning purposes; determines eligibility for state historic preservation grant funding; and affords certain protections under CEQA.

To be eligible for listing in the CRHR, a resource must satisfy at least one of the following four criteria:

1) It is associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States.
2) It is associated with the lives of persons important to local, California, or national history.

3) It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values.
4) It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

Cultural and historical resources eligible for listing in the CRHR must meet one of the criteria of significance described above and retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. For the purposes of eligibility for CRHR, integrity is defined as "the authenticity of an historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance" (Office of Historic Preservation 2001).

CALIFORNIA ENVIRONMENTAL QUALITY ACT SIGNIFICANCE CRITERIA

CEQA requires state and local public agencies to identify the environmental impacts of proposed discretionary activities or projects, determine if the impacts will be significant, and identify alternatives and mitigation measures that will substantially reduce or eliminate significant impacts to the environment.

Historical resources are considered part of the environment, and a project that may cause a substantial adverse effect on the significance of a historical resource is a project that may have a significant effect on the environment. "Historical resource" applies to a building and/or structure that:

1) is listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code, § 5024.1, Title 14 CCR, Section 4850 et seq.); or
2) is included in a local register of historical resources, or is identified as significant in a historical resource survey meeting the requirements of section 5024.1(g) of the Public Resources Code; or
3) is a building or structure determined to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California.

Lead agencies have a responsibility to evaluate historical resources prior to making a finding as to a proposed project's impacts. Mitigation of adverse impacts is required if the proposed project will cause substantial adverse change. Substantial adverse change includes demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired. While demolition and destruction are obvious significant impacts, it is more difficult to assess when change, alteration, or relocation crosses the threshold of substantial adverse change. The CEQA Guidelines provide that a project that demolishes or alters those physical characteristics of a historical resource that convey its historical significance (i.e., its character-defining features) is considered to materially impair the resource's significance.

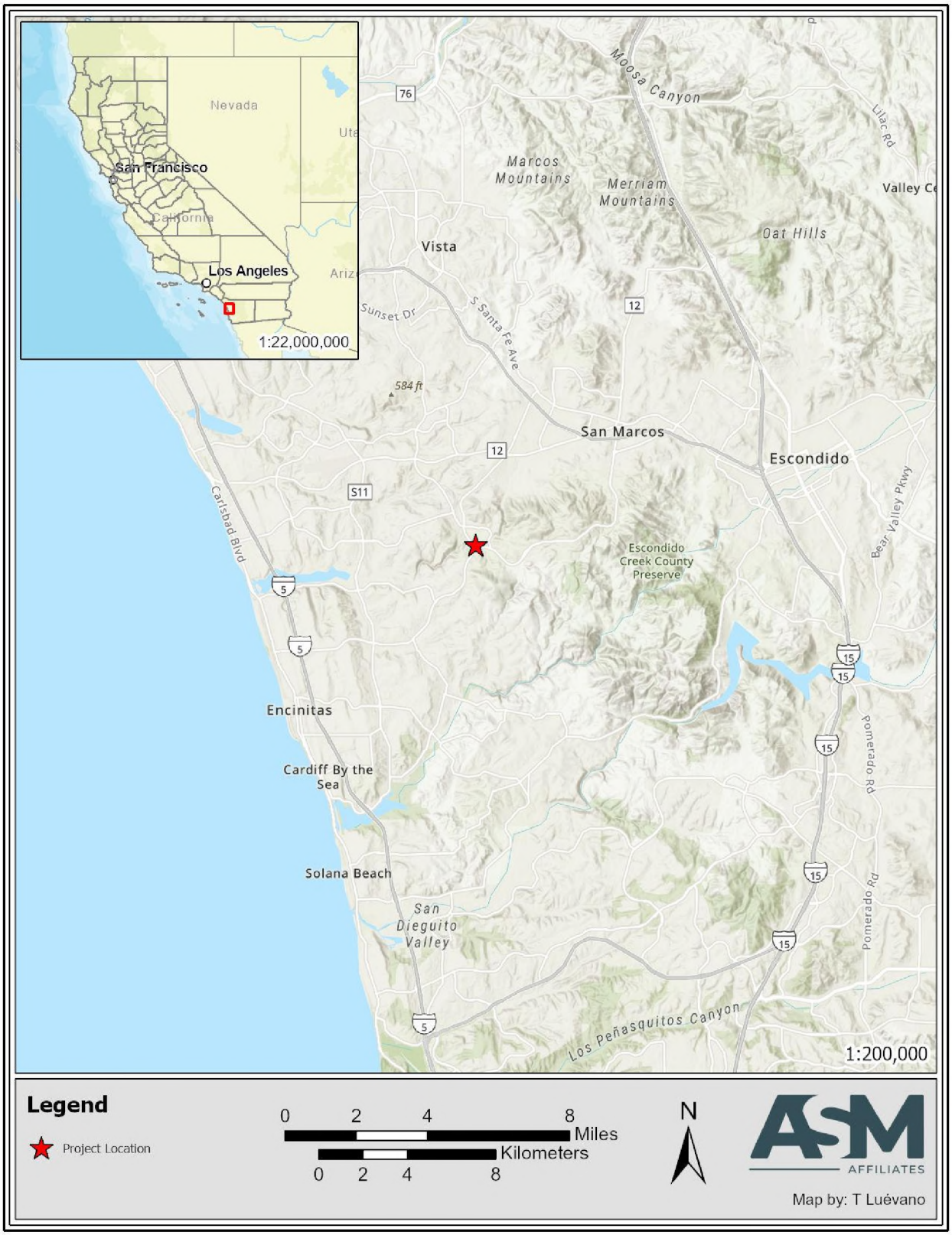

Figure 1. Project Vicinity Map.

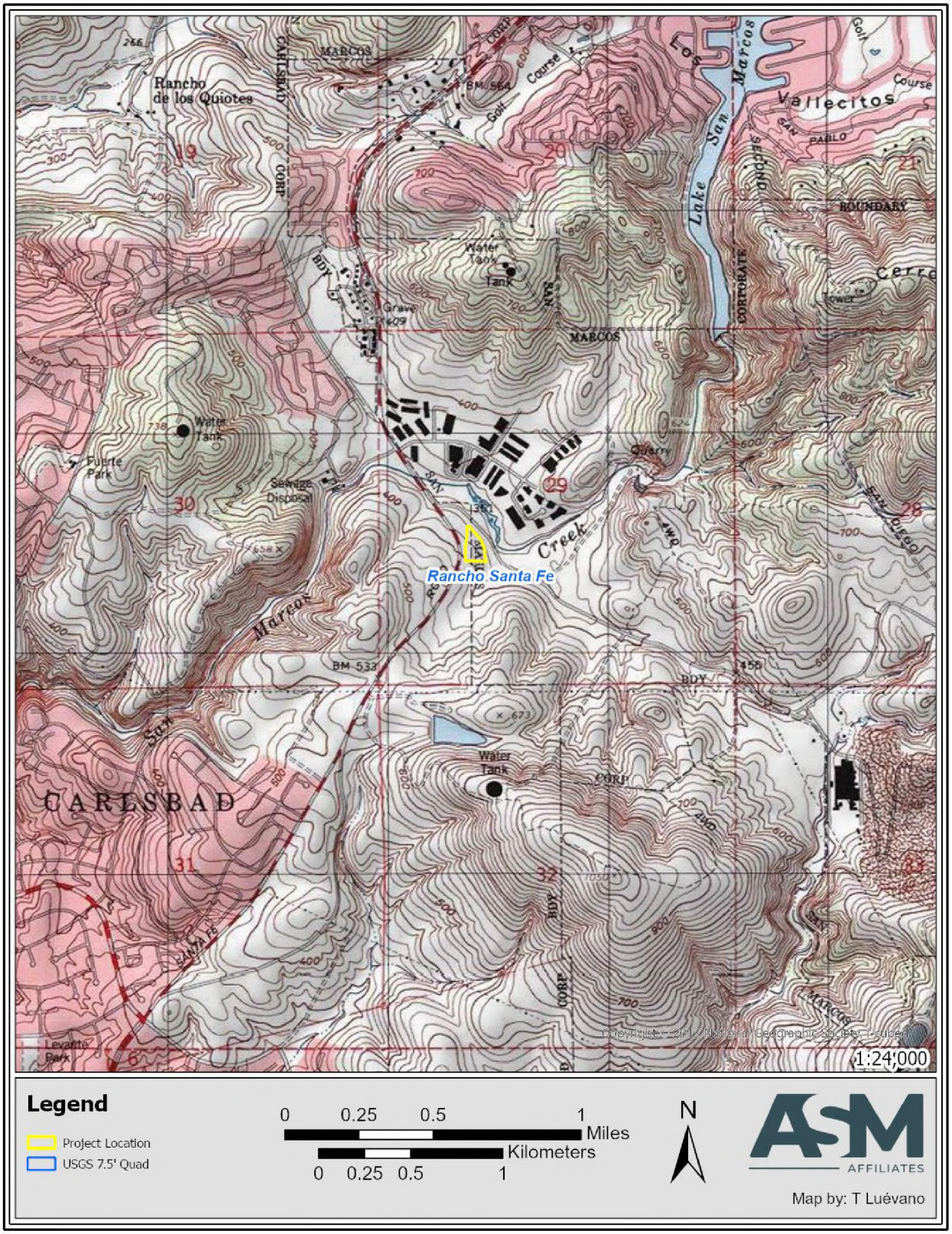

Figure 2. Project Location Map, USGS 7.5' Quad.

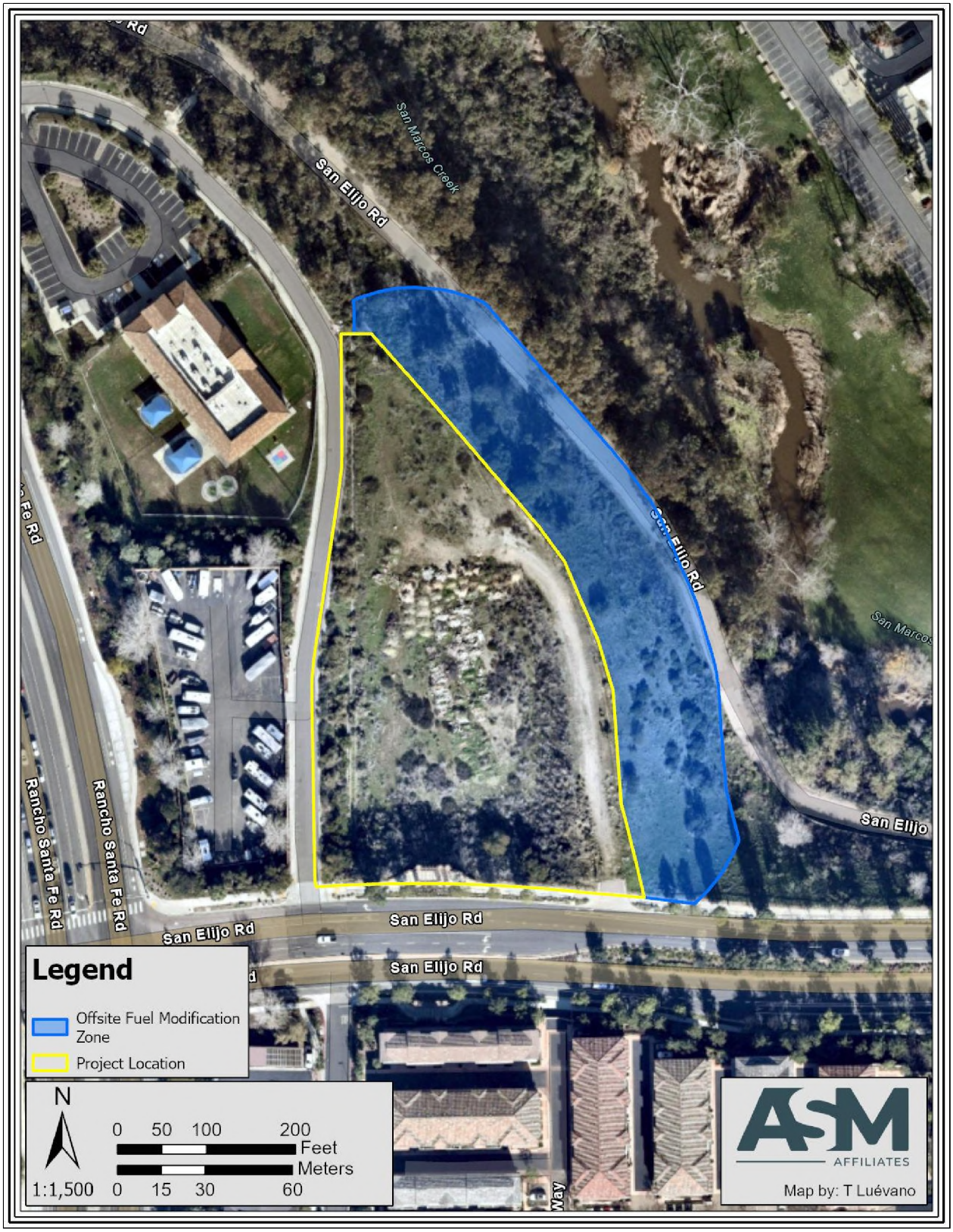

Figure 3. Project Area, aerial photograph.

2.0 PROJECT AREA SETTING

2.1 NATURAL SETTING

The study area lies on the coastal plain of San Diego County in the Coastal Province and western Peninsular Range Province (Griner and Pride 1976:15). The coastal strip has a 130-kilometer (km)-long shoreline and is composed of raised Pleistocene marine and non-marine terraces ranging from 20 to 5 km in width (Weber 1963). Cretaceous, Tertiary, and Quaternary marine and non-marine sedimentary deposits define these terraces, which have been extensively modified by erosion.

Drainages of varied catchment size are closely spaced along the coast, and lagoons have formed at the mouths of many of these rivers. The southern third of the San Diego County coastline is dominated by Tijuana Lagoon, San Diego Bay, and Mission Bay, while the central portion includes six main drainages, mostly with small catchments and associated lagoons. The northern third of the county's coastline extends from the San Luis Rey River to San Mateo Creek and encompasses Marine Corps Base Camp Pendleton and three of the county's four largest drainage catchments. The San Marcos area is part of the central coastal plain.

The coastal plain is characterized by a Mediterranean semiarid steppe climate (Bowman 1973; Hines 1991:4). Precipitation ranges from 225 to 400 millimeters (mm) per year and is concentrated in the winter (from December to April). The prominent vegetation throughout the area is coastal sage scrub (Munz 1974), and important associated species include buckwheat (*Eriogonum fasciculatum*), black sage (*Salvia mellifera*), white sage (*Salvia apiana*), sugar bush (*Rhus ovata*), squaw bush (*Rhus aromatica*), and laurel sumac (*Malosma laurina*). In the valley floors, freshwater marsh species include cattail (*Typha* sp.), spike-rush (*Eleocharis* sp.), and bulrush (*Scirpus* sp.), while common salt marsh plants include pickleweed (*Salicornia virginica*), salt grass (*Distichlis spicata*), and sea lavender (*Limonium californicum*). Willow (*Salix* sp.), cottonwood (*Populus fremontii*), and sycamore (*Platanus racemosa*) trees are common in valley floor riparian habitats.

2.2 CULTURAL SETTING

ARCHAEOLOGICAL CONTEXT

Archaeological fieldwork along the southern California coast has yielded a diverse range of human occupation extending from the terminal Pleistocene into the Ethnohistoric period (Erlandson and Colten 1991; Jones 1992; Moratto 1984). A variety of different regional chronologies, often with overlapping terminology, have been used in coastal southern California, and they vary from region to region. Today, the prehistory of San Diego County is generally divided into three major temporal periods: Paleoindian, Archaic, and Late Prehistoric. These time periods are characterized by patterns in material culture that are thought to represent distinct regional trends in the economic and social organization of prehistoric groups.

Paleoindian Period

The antiquity of human occupation in the New World has been the subject of considerable debate over the past few decades. A widely accepted model is that humans first entered the Western Hemisphere between 12,000 and 15,000 years before present (B.P.) While there is no firm

evidence of human occupation in coastal southern California prior to 12,000 B.P., dates as early as 23,000 B.P. and even 48,000 B.P. have been reported (Bada et al. 1974; Carter 1980; Rogers 1974). The amino acid racemization technique used to date these sites has been largely discredited, however, by more recent accelerator radiocarbon dating of early human remains along the California coast (Taylor et al. 1985). Despite intense interest and a long history of research, no widely accepted evidence of human occupation of North America dating prior to 15,000 B.P. has emerged.

The Paleoindian period begins with Clovis occupation, a widespread phenomena in North America. Noted for its distinctive tool kit characterized by fluted points, Clovis occupation dates to the end of the Pleistocene, from 11,200 B.P. to 10,600 B.P. (Meltzer 1993). The Paleoindian period in San Diego County is considered to date to the terminal Pleistocene and the early Holocene, from at least 10,000 B.P. to 8500/7500 B.P. (Moratto 1984; Warren et al. 2008). Although no Clovis sites are documented in the region, occasional isolated fluted points have been recovered. A variety of terms have been proposed for Paleoindian assemblages in the southern California region. Rogers, the first to temporally order the archaeological assemblages of the region, introduced, then later discarded, the terms Scraper-Makers, Malpais, and Playa to label early lithic industries of the region (see Warren 1967 for a comprehensive review). Rogers (1939, 1945) then coined the term San Dieguito, still widely used today, to refer to the earliest artifact assemblages in San Diego County. San Dieguito assemblages are composed almost entirely of flaked stone tools, including scrapers, choppers, and large projectile points (Warren 1987; Warren et al. 2008). Until recently, the near absence of milling tools in San Dieguito sites was viewed as the major difference between Paleoindian economies and the lifeways which characterized the later Archaic period.

The terminal Pleistocene San Dieguito adaptation occurred within a climatic period of somewhat cooler and moister conditions than exist presently. The range of possible San Dieguito economic adaptations and the interpretation of the San Dieguito complex as a big-game hunting tradition are based primarily on materials from the Harris Site (Ezell 1983, 1987; Warren 1966, 1967). Subsequently, it was hypothesized that differences between San Dieguito and the subsequent La Jolla artifact assemblages may reflect functional differences rather than temporal or cultural variability (Bull 1987; Gallegos 1987; Wade 1986).

Archaic Period

The Archaic period (similar to the Encinitas tradition and the Millingstone horizon) began between 9,000 and 8,500 years ago and ended between 1,300 and 800 years ago (Gallegos 1992; Moratto 1984; Rogers 1966; Warren et al. 2008). A distinction is often made between coastal shell midden sites (La Jolla complex) and inland non-shell midden sites (Pauma complex). Shell middens are generally characterized by flaked cobble tools, basin metates, manos, discoids, and flexed burials. Three temporal phases have been distinguished within the Archaic period (Warren et al. 2008).

Initial Archaic exploitation of the San Diego area littoral zone is generally considered to have entailed sizable semisedentary populations focused around resource-rich bays and estuaries (Crabtree et al. 1963; Gallegos 1992; Shumway et al. 1961; Warren 1964, 1968; Warren and Pavesic 1963; Warren et al. 1961). Shellfish were interpreted as a dietary staple; plant resources (both nuts and grasses) also were an important dietary component, while hunting and fishing were

less important. This adaptive strategy remained largely unchanged for several thousand years. According to Warren et al. (1961:25) "the La Jolla Complex reached its population and cultural climax between 7000 and 4000 years ago when there was a plentiful supply of shellfish in the lagoons along the coast." Major changes in human adaptations occurred after 4,000 years ago when estuarine silting was considered to have become so extensive as to cause a decline in associated shellfish populations. A major depopulation of the coastal zone has been postulated, with settlements shifting inland to a river valley orientation, intensifying exploitation of terrestrial small game and plant resources, possibly including acorns (Christenson 1992; Crabtree et al. 1963; Gallegos 1985, 1987, 1992; Masters and Gallegos 1997; Rogers 1929a:467; Warren 1964, 1968; Warren and Pavesic 1963; Warren et al. 1961). The coast was abandoned or only seasonally occupied, with a possible slight increase in coastal occupation after 1,600–1,200 years ago.

Late Prehistoric Period

The Late Prehistoric period is generally considered to have begun between 1,300 and 800 years ago (Moratto 1984; Rogers 1945; Warren et al. 2008) or the equivalent of between A.D. 700 and 1250. Local regional cultural complexes have been distinguished between the northern area (San Luis Rey complex), southern coastal area (Yuman complex), and the southern inland area (Cuyamaca complex). In general, this period was characterized by the appearance of small pressure-flaked arrow points (Cottonwood Triangular and Desert Side-notched points) indicative of bow and arrow technology, the appearance of ceramics, the replacement of flexed inhumations with cremations, the possible appearance of the mortar and pestle, and an emphasis on inland plant-food collecting and processing, especially of acorns (Christenson 1990; McDonald and Eighmey 2008; Meighan 1954; Rogers 1945; True 1966; Warren 1964, 1968). The precise timing of the introduction of these items is still debated due to the poor chronological resolution and bioturbation at multicomponent sites (Griset 1996; McDonald and Eighmey 2008). In addition, recent research is revealing the persistence of inhumations throughout most of the late Holocene in northern coastal San Diego.

Explanations for the origin of the Late Prehistoric period vary. Kroeber (1925:578) speculated that Uto-Aztecan-language speakers migrated from the deserts to the southern coast of California at least 1,000–1,500 years ago. Some archaeologists have embraced this hypothesis and correlated it with the origins of the Late Prehistoric period (Meighan 1954; Warren 1968). Rogers (1929b) initially discussed the Luiseño and Kumeyaay under the rubric of the Mission Indians and distinguished them from earlier shell-midden and scraper-maker cultures. Rogers (1945) later argued for continuity in occupation from the Archaic to the Late Prehistoric period, and he distinguished three phases of shell middens. He argued that the Kumeyaay culture of 500 years ago was the result of an earlier migration of Yuman populations from the coast to the Colorado River (perhaps as the result of an influx of Shoshone populations in northern San Diego County), adaptation to this new riverine setting and adopting traits from adjacent populations in the Southwest, and subsequent movement back to the coast at the onset of the Late Prehistoric period. Subsequently, scholars have emphasized several cultural processes to explain Late Prehistoric cultural developments including: a chronological gap (Wallace 1955), cultural continuity and the addition of new traits (True 1966, 1970; Warren 1964, 1968), a population replacement (Bull 1987), or that several factors were at play.

The San Luis Rey complex in the northern inland area was defined by Meighan (1954), refined by True, and generally applied to the north coast region (True 1966; True and Waugh 1982, 1983; True et al. 1974, 1991). Meighan (1954:Table 2) suggested the San Luis Rey I phase began around A.D. 1400 and included small triangular arrow points, manos, portable metates, mortars, pestles, *Olivella* beads, and stone pendants. The San Luis Rey II phase differed only in the addition of ceramics and pictographs around A.D. 1750. True (1993:17) further hypothesized that the lower portions of the San Luis Rey drainage had sedentary villages with limited use of marine resources. The Late Prehistoric period has been paradigmatically linked with the subsequent ethnohistoric record, and direct historical analogies assume considerable adaptive stability for populations, linguistic groups, and their territorial extent as documented by Europeans.

ETHNOGRAPHIC CONTEXT

The Post-Contact period began in A.D. 1769 with the Spanish establishment of the Mission San Diego de Alcalá. Spanish explorers had first encountered Native Americans in the San Diego area in A.D. 1542 when Juan Rodríguez Cabrillo landed at Point Loma along San Diego Bay, and local inhabitants would have been negatively affected by protohistoric transmission of diseases via sea visits and through contact with Native Americans in the Baja California region. Gaspar de Portolá's A.D. 1769 expedition from San Diego to Monterey documented a series of Native American coastal villages in the San Diego area, typically situated along the region's major drainages (Carrico 1977). The subsequent establishment of the San Juan Capistrano Mission in 1776 and the San Luis Rey de Francia Mission in 1798 further impacted traditional coastal settlement systems. Acculturation, assimilation, and the introduction of Old World diseases greatly disrupted and reduced Native American populations, and by the early 1800s traditional coastal villages were largely abandoned (Carrico 2008). As a result, historians know very little about traditional coastal life, except what can be gleaned from mission records. Nineteenth- and twentieth-century ethnohistoric reconstructions provide only minimal insight into coastal adaptations — particularly with respect to such issues as cultural complexity, population densities, and regional interaction — and are built from the perspective of remnant inland populations and their occasional seasonal exploitation of a littoral zone dominated and largely controlled by European settlers.

From north to south, coastal San Diego was occupied by the Juaneño, Luiseño, and Kumeyaay Native American groups (Bean and Shipek 1978; Kroeber 1925:636; Shipek 1978). The Juaneño and Luiseño are Uto-Aztecan speakers whose territory ranged from Agua Hedionda Lagoon (or possibly Batiquitos Lagoon) in the south to Aliso Creek in Orange County, to near Santiago Peak in the northeast, and to the Palomar Mountain area in the southeast. They are linguistically and culturally related to the Gabrielino and the Cahuilla (Bean and Shipek 1978; Sparkman 1908). The terms Juaneño and Luiseño are derived from association with the San Juan Capistrano and San Luis Rey missions, respectively, along the coast. Kroeber (1925:636) recognized Juaneño as a dialect of Luiseño, while Bean and Shipek (1978:550) and White (1963:91) viewed the Juaneño as part of the Luiseño on the basis of cultural and linguistic similarities. As White (1963:19) succinctly stated: "Little or nothing is known about the coastal Juaneño-Luiseño," and hence the following ethnohistoric observations are largely based on inland Luiseño.

During this period, the Luiseño people had a fairly rigid social structure and a moderately high population density (Bean and Shipek 1978). Maximum population estimates at Spanish contact

range from 5,000 (Kroeber 1925) to 10,000 (White 1963). With a territory extending for almost 4,000 sq. km, maximum population density estimates range from 1.25 to 2.5 persons per sq. km (3.3 to 6.7 persons per sq. mile). White (1963) estimated that the Luiseño included approximately 50 villages of 200 individuals each, while Oxendine (1983), using Portolá expedition observations, indicated that village size was closer to 60. Recent research with mission records suggests that village size varied significantly in the eighteenth century, with larger villages such as Topome along the Santa Margarita River consisting of multiple clans (Johnson and Crawford 1999).

The Luiseño are divided into several autonomous lineages or kin groups based on patrilineal descent groups and a patrilocal residential pattern. Each Luiseño lineage is based around an autonomous village that held collective ownership over a well-defined territory for hunting and gathering, and violations of trespass were punished (Bean and Shipek 1978). Village territories may have ranged from as little as 10 sq. km near the coast along major drainages such as the San Luis Rey River (Oxendine 1983:45) to as much as 100 sq. km elsewhere (White 1963). A variety of shorter-term residential camps (such as for acorn gathering) and specialized localities occurred within each village territory (Oxendine 1983; White 1963). There are varied estimates for the length of the annual stay at the main village, and True et al. (1974) have even suggested a bipolar pattern with two permanent base camps, one in a major valley and another in the mountain region.

Notably, strong differences in social status, ascribed leadership roles, and elaborate ritual paraphernalia existed (Bean and Shipek 1978; Sparkman 1908). Leadership includes hereditary chiefs and council members who have specialized knowledge and authority over specific religious, economic, and warfare issues. Leaders conduct elaborate ceremonies; ritual and ceremonial specialists maintained ceremonial knowledge in secrecy and passed on the knowledge to only one heir (White 1963; Winterrowd and Shipek 1986). These leaders and specialists made use of fenced-in ceremonial structures, located in the village center.

Economic activities took place within the community and the extended household level and varied significantly between coastal and inland areas (Bean and Shipek 1978:552). Community-wide efforts included fire management for game drives, and systematic use of fire to facilitate grasslands and increase yields of key plants and animals. Such burning was regularly mentioned in early Spanish accounts (Bean and Lawton 1976; Blackburn and Anderson 1993). Acorns, gathered in upland areas, have been considered the most important food source. Seeds from grasses, manzanita, sage, sunflowers, lemonade berry, chia, and other plants also were used along with various wild greens and fruits. Deer, antelope, small game, and birds were exploited. Coastal marine animals utilized as food included sea mammals, fish, crustaceans, and mollusks. Near-shore fishing was done from light balsa reed or dugout canoes. Some accounts indicate that coastal communities exploited local shellfish in the winter (Sparkman 1908; White 1963), and during times of stress the interior Luiseño traveled to the coast to obtain shellfish, fish, and even some land mammals (White 1963). Bean and Shipek (1978) noted that most inland groups also had fishing and gathering locations on the coast which they visited annually when the tides were low or when the inland resources were scarce, typically from January through March.

Rigid gender division of labor did not exist, but women generally collected plant resources and men hunted (Bean and Shipek 1978). Houses were dispersed throughout villages. Lowland village houses were conical structures covered with tule bundles, and other structures included

sweathouses, ceremonial enclosures, ramadas, and acorn granaries. Domestic implements included wooden utensils, baskets, ceramic cooking and storage vessels, and milling tools. Hunting implements included bow and arrow, curved throwing sticks, nets, and snares. Nets and hooks made of shell and bone were used for fishing.

Project Specific Ethnographic Context

Villages often were located in sheltered areas in valley bottoms, along streams, or along coastal strands near mountain ranges. Villages also were located near water sources, keeping in mind that modern development has drastically changed the presence and frequency of water sources (Oxendine 1983). While no placenames or villages were identified as being directly associated with the Project area, there are several in the larger vicinity of the Project (Oxendine 1983). Many place names have multiple possible spellings and meanings derived from different sources. Nearby place names include *Panakara* and *Mehel-om-pom-pauvo* to the east and multiple habitation areas along the San Luis Rey River watershed to the north including *Wiasamai* (a village east of Mission San Luis Rey), *Wagaumaj* (village site near Guajome), *Kwalam* (village site along the San Luis Rey River), and *Tomkav* (village at Monserrate).

In addition to placenames, there are several habitation areas in the larger vicinity of the Project area. SDI-5633, located approximately 4.4 miles (mi.) northeast of the Project area, was identified as a habitation or specialized area (Gallegos and Associates 2002). A data recovery at SDI-5633 placed the occupation of the site circa A.D. 1170 to A.D. 1690. The site also contains evidence of an earlier occupation, likely during the Archaic Period, based on the presence of large milling tools and Coso obsidian. It was identified as a habitation area used primarily for hunting and for projectile point production and milling of plant seeds. W-1556/SDI-5641, located approximately 4.67 mi. northeast of the Project area, is recorded as a habitation site consisting of an artifact-laden midden soil overlooking the San Marcos Valley flood plain. The site contained an extensive artifact deposit with hearths, milling features, and human remains. SDI-11068A/B (known as the Twin Oaks Valley Ranch site), located approximately 7.1 mi. northeast of the Project area, contained a large amount of shell fragments and fish bone, and bedrock milling features, as well as a high number of ceramics and ceramic types, bow pipes, effigies, and a wide variety of milling implements (Gallegos and Schroth 1993).

Other major habitation areas within the region include SDI-9822 (known as the Deer Springs Site), located approximately 10 mi. northeast of the Project area, which included a red pictograph that also contained pecking. SDI-12209, located approximately 6.9 mi. to the east, contains a habitation area with significant subsurface deposits and a rock art panel, showing this habitation area was an important location along Escondido Creek.

HISTORICAL CONTEXT

Although the earliest historical exploration of the San Diego area can be traced to 1542 with the arrival of the first Europeans, particularly the exploration of San Miguel Bay (known in the current day as San Diego Bay) by Juan Rodríguez Cabrillo, the widely accepted start of the historical period is 1769 with the founding of the joint Mission San Diego de Alcalá and Royal Presidio. On July 20, 1769, Father Juan Crespí arrived in the San Luis Rey River Valley with the Portolá expedition to Monterey. His report back to his superiors declaring it an ideal location for a mission led to the eventual founding of Mission San Luis Rey de Francia, the eighteenth California mission

(Pourade 1961:115). The mission was formally dedicated June 13, 1798. Named for King Louis IX of France, this mission became known as the "King of Missions" due to its size and success. At its height, San Luis Rey became one of the most populous and successful of the missions. In 1824, it had an Indian neophyte population of 3,000, and the extensive mission lands supported 1,500 horses, 2,800 sheep, and 22,000 cattle (Pourade 1961:139).

Mexico won independence from Spain in 1821, and, with it, the process of dismantling of the mission system began to unfold. The 1833 Secularization Act passed by the Mexican Congress ordered half of all mission lands to be transferred to the Indians and the other half to remain in trust and managed by an appointed administrator. These orders were never implemented because of several factors that conspired to prevent the Indians from regaining their patrimony. By 1835, the missions, including Mission San Luis Rey, were secularized. The remaining lands of San Luis Rey were sold in 1846 to José Cota and José A. Pico by Pío Pico, Governor of California, and the Luiseño converts who had lived around the mission were removed to nearby Pala (Hawthorne 2000).

Before secularization of the missions, San Marcos was one of the cattle-grazing tracts claimed by Mission San Luis Rey. During the 1840s, when many land grants or ranchos were issued, Governor Juan Bautista Alvarado granted the 8,877-acre Rancho Los Vallecitos de San Marcos (the Little Valleys of St. Mark) to Don José María Alvarado in 1840. Don José married Lugarda Osuna, daughter of the owner of San Dieguito Rancho, Don Juan María Osuna (Moyer 1969:22; Musser and the San Marcos Historical Society 2014:13-14).

In 1846, shortly after the Battle of San Pasqual, Don José and ten other rancheros were captured and taken to a ranchería at Agua Caliente where they were slain (Moyer 1969:22; Bibb 1976). Lugarda later married Luis Machado, the owner of Rancho Buena Vista. It is unclear who owned Rancho Los Vallecitos de San Marcos in the years following her marriage, but, in 1851, Lorenzo Soto filed a claim for the rancho with the newly established United States Land Commission (Moyer 1969:22; Musser and the San Marcos Historical Society 2014:14). Soto officially acquired the 8,875.83 acres on March 1, 1883 (General Land Office 1883). Cave J. Couts, a former Army officer and owner of the adjacent Rancho Guajome and Rancho Buena Vista, later came into possession of the ranch (Musser and the San Marcos Historical Society 2014:15).

A transcontinental railroad line was completed in November 1885, resulting in an unprecedented real estate boom for the city of San Diego and the surrounding County. The population of San Diego County soared in the mid-1880s from a total population of 5,000 in 1885 to 40,000 in 1889 (MacPhail 1979). Settlers poured into San Diego, lured by real estate promotions offering a salubrious climate, cheap land, and the potential to realize great profits in agriculture and real estate. Speculators formed land companies and subdivided townsites throughout the county (Pourade 1964:167-191). The real estate boom also stimulated demand for agricultural land in the county, and the number of farms increased from 696 to 2,747 between 1880 and 1890 (Schaefer et al. 1994). This boom brought homesteaders to the San Marcos area. San Marcos was typical of the small agricultural communities that grew up in the hinterland of San Diego, characterized generally by widely dispersed settlements that were united by a common school district, post office, church and general store (Van Wormer 1986a, 1986b, 1987).

Major Gustavus French Merriam, from Topeka, Kansas, made the first permanent American settlement in the San Marcos area. Merriam homesteaded 160 acres in the north Twin Oaks Valley and began wine and honey production. German and Dutch immigrants began moving into the area in the early 1880s. In 1883, a few miles south of the settlement, John H. Barham founded the first town in the area, calling it Barham. By 1884, the town of Barham had a post office, blacksmith, feed store, and a weekly newspaper (City of San Marcos 2004). William Webster Borden published the town's first newspaper called *Our Paper* and later *The Plain Truth* (Sherman 2001:44).

In 1887, Cave Couts' widow sold San Marcos Ranch to O. S. Hubbell, and he sold it to the San Marcos Land Company headed by Jacob Gruendike, a San Diego banker, and his associate W. G. Jacobs. The San Marcos Land Company had been formed with the intention of developing a townsite. The company laid out a townsite near the intersection of Grand Avenue and Rancho Santa Fe Road with 5- to 10-acre plots. A number of houses were built in addition to a hotel, post office, and several stores. In 1892, there were 87 registered voters. In the late 1880s, the Santa Fe Railroad announced that it was going to lay tracks through the valley. To the disappointment of the citizens, the tracks were laid one mile away from the center of the town. The old town was abandoned in 1901, and many of the buildings were moved to the intersection of Mission and Pico (Moyer 1969:22-24). By 1905, the new town had every convenience, including rural mail delivery and telephone service. In 1889, the first school in the area, which was started in Barham in 1880, moved to San Marcos. Later that same year, the Richland School was built, becoming the second school in San Marcos (City of San Marcos 2004). San Marcos remained a quiet rural town through the first half of the twentieth century.

Agriculture dominated the local economy from the late 1800s until the mid-1900s, and that economy was dependent on dairies and poultry production (Musser and the San Marcos Historical Society 2014). However, during the late 1920s, a new business envisioned and created by northern Californians was developed in San Marcos. Donly Gray, an olive grower and nurseryman, sold Mulberry bushes at his nursery in Marysville. After studying the market for silk and its production using mulberry bushes, he sought out financial backing to develop a silkworm production operation. Glenn Hurst, a San Francisco businessman, and his collective of businessmen provided the financial capital for the silkworm project, and they organized as the American Silk Inc. in 1926. After considering locations within Southern California, they decided on San Marcos and purchased 367 acres of land at present-day Mission Road and Mulberry Drive. In 1926, Donly Gray led the efforts to plant 45,000 mulberry trees to feed ravenous silkworms. The following year the company opened its 50,000-square-foot silkworm mill, where workers incubated and hatched worm eggs imported from France, Italy, Turkey, Egypt, and Sudan. The facility was the largest building in San Marcos, and, at one point, 100 employees worked in the building. Although the company began making silk stockings in 1930, the effects of the Great Depression and competition from Asia and Europe meant the enterprise did not get much further than an experimental phase. Despite an attempt to restart the operations in the mid-1930s, the operations were not revived, and the company was bankrupt (Musser and the San Marcos Historical Society 2014:59-61; Rossi 2006). Dairies and poultry farms continued to be the economic mainstay of the unincorporated area.

Population growth in San Marcos, and many other unincorporated areas in the county, had been constrained by the lack of water resources in the region. The arrival of Colorado River water in

the city in 1956, supplementing the existing local water supply, was a big boon to the area. After the arrival of water, several small businesses started, and the population rapidly increased to 2,500. To safeguard its water rights from Escondido, the town of San Marcos, with a population of 3,200 residents, was incorporated on January 28, 1963. Through the 1960s, the City grew by a few thousand new residents, but, in the 1970s, San Marcos was flourishing as the third-fastest growing city in the state with a population of 17,479 by 1980. During the 1980s, San Marcos almost doubled its population to 33,800. Growth has continued to boom in San Marcos, with the population of the City reaching 67,426 in 2003 and standing at 94,188 as of 2023 (City of San Marcos 2004; Musser and the San Marcos Historical Society 2014:77-90; United States Census Bureau n.d.).

A Brief Land-Use History of Project Area (APNs 223-65-101 and 223-81-202)

The Project area falls southwest of the 8,877-acre Rancho Los Vallecitos de San Marcos (the Little Valleys of St. Mark) granted to Don José María Alvarado in 1840 and confirmed to Lorenzo Soto on March 1, 1883 (General Land Office 1883). The earliest available aerial images of the Project, dating to 1947, appear to show undeveloped land (NETR Online n.d.). The broader general vicinity farther away from the immediate Project area is a paved road (the modern Rancho Santa Fe Road) and an established dirt road connecting to and running southeast from Rancho Santa Fe Road, along with the San Marcos Creek. No changes appear until 1964, at which point a sand and gravel mine is established to the northwest along the San Marcos Creek in the broader general vicinity. By 1978, the broader general vicinity begins to undergo mass grading and initial stages of industrial development to the north. However, the Project area remains undeveloped between 1964 and 1978.

The development trend in the broader general vicinity and lack of development in the Project area continues through aerials between 1978 and 2000, the only exception being the conversion of the established dirt road identified in 1947 to a paved road by 1980. Starting with the 2002 aerial, mass grading is visible in the Project area, along with mass grading to the south and east in the broader general vicinity. By the 2005 aerials, the Project area is fully mass graded. Mass grading in the broader general vicinity to the south and east has expanded, and previously graded areas have been developed with residential buildings. The 1980 paved road, previously the 1947 dirt road, has been demolished southeast of the Project area by mass grading and development; the portion running east adjacent to the Project area remains and can be accessed via the newly built San Elijo Road, but no longer connects with Rancho Santa Fe Road. By the 2014 aerials and onward, the Project area remains undeveloped following its mass grading and has vegetation regrowing within its boundaries. The broader general vicinity is fully developed with a mix of residential and industrial buildings.

3.0 RESEARCH DESIGN

The primary objectives of the study with respect to prehistoric and historic archaeological resources were straightforward: to identify and document cultural resources that are detectable through surface observations. For the research design, the field requirements are (1) that survey coverage include all portions of the study area that can safely be covered and that offer some realistic prospects for containing identifiable resources (excluding, for instance, areas with very steep slopes, flooded areas, areas with no ground-surface visibility, or areas where modern construction has destroyed or buried the natural ground surface), and (2) that the spatial extent and general character of any identified cultural resources be documented according to the prevailing professional standards.

4.0 STUDY METHODS AND RESULTS

4.1 RECORD SEARCH AND LITERATURE REVIEW

A California Historical Resources Information System (CHRIS) records search request was conducted at the South Coastal Information Center (SCIC), San Diego State University, on September 18, 2018, in order to assess the presence or absence of cultural and historic resources within the originally designed Artis Senior Living Project area and a one-mile radius. The SCIC records search indicated that 26 previously recorded cultural resources occur within a one-mile radius of the Project location with no cultural resources previously recorded within the original Artis Senior Living Project area.

A second CHRIS records search request was conducted at the SCIC on October 16, 2025, to update the table for any new reports or resources identified since 2018. The second records search indicated that 28 previously recorded cultural resources occur within a one-mile radius of the current Project location; none of the cultural resources are within the current Project area. Table 1 provides a summary of the archaeological sites previously recorded within one mile of the Project area.

Table 1. Previously Recorded Archaeological Sites within 1 Mile of the Project Area
(Sites within Project Area are in Bold)

Primary No. P-37-	Trinomial CA-SDI-	Principal Recorder(s) (Year)	Description/ Comments	Proximity to Project (mi.)
004397	4397	Kaldenberg 1976	AP12. Quarry	0.66
004498	4498	Kaldenberg 1975; Franklin 1981	AP4. Bedrock milling feature; AP8. Stone feature; AP15. Habitation debris	0.36
004843	4843	Kaldenberg N.D.	AH15. Standing structure	0.16
007306	7306	Graham 1979	AP2. Lithic scatter	0.44
007307	7307	Graham and Dittmar 1979	AP2. Lithic scatter	0.63
007308	7308	Graham 1979	AP2. Lithic scatter	0.59
007309	7309	Graham 1979	AP2. Lithic scatter	0.70
009918	9918	Thesken 1984	AH9. Mines/quarries/tailings	0.24
011432	11432	Pigniolo and Briggs 1989	AP4. Bedrock milling feature	0.51
011433	11433	Pigniolo and Briggs 1989	AP4. Bedrock milling feature	0.54
011434	11434	Pigniolo and Briggs 1989	AP2. Lithic scatter	0.37
011435	11435	Pigniolo and Briggs 1989	AH2. Foundations; AH4. Trash scatters	0.58
011436	11436	Pigniolo and Briggs 1989	AP4. Bedrock milling feature	0.72
011437	11437	Pigniolo and Briggs 1989	AH16. Cairn	0.70
011438	11438	Pigniolo and Briggs 1989	AP4. Bedrock milling feature	0.79
011439	11439	Pigniolo and Briggs 1989	AP4. Bedrock milling feature	0.18
011440	11440	Pigniolo and Briggs 1989	AP4. Bedrock milling feature	0.08
011441	11441	Pigniolo and Briggs 1989	AP4. Bedrock milling feature	0.62
011442	11442	Pigniolo and Briggs 1989; Cordova and Cox 2015	AP2. Lithic scatter; AH4. Trash scatters	0.75
011443	11443	Pigniolo and Briggs 1989	AH11. Wall	0.55

Primary No. P-37-	Trinomial CA-SDI-	Principal Recorder(s) (Year)	Description/ Comments	Proximity to Project (mi.)
011444	11444	Pigniolo and Briggs 1989	AH12. Graves/cemetery	0.62
011569	11569	Kyle, Linehan and Baker 1992	AP2. Lithic scatter	0.23
011570	11570	Pigniolo and Campbell 1990	AP2. Lithic scatter	0.13
012689	12689	Roth and Associates 1990; Kyle, Linehan and Baker 1992	AP2. Lithic scatter	0.71
014079	14026	Schultz, Briggs and Glenn 1995	AP2. Lithic scatter	0.94
025478	–	Price and Collett 2004	AH11. Wall	0.56
033635	21128	Shaver 2014; Cordova and Cox 2015	AH7. Road	0.71
038995	22924	Stropes 2020	AP16. Isolate	0.98

Table 2 provides a summary of the previous studies that have been conducted within one mile of the Project. In total, 64 studies have been conducted within one mile of the current Project site, but only 15 studies intersect or overlap the Project area. These 15 studies collectively cover the entire Project area.

Table 2. Summary of Previous Studies Conducted within 1 Mile of the Project Area (Reports within Project Area are in Bold)

NADB No.	SHPO ID	Year	Author(s) or Publisher	Title	Proximity To Project
1120086	SD-00086	1980	Apple, Stephen A. and Richard K. Olmo	An Archaeological Assessment of SDM-W-915 La Costa Meadowbrook Carlsbad. California	Outside
1120194	SD-00194	1977	Berryman, Stanley R.	Archaeological Investigation of the Gaty and Denk Reserves and Water Transmission Line	Outside
1120305	**SD-00305**	**1988**	**Bissell, Ronald M. and Rod Raschke**	**Cultural and Paleontological Resources Literature Review of the Rancho Santa Fe and Questhaven Business Center Properties, San Marcos, San Diego County, California.**	**Intersects Project**
1120712	SD-00712	1975	Kaldenberg, Russell L.	An Archaeological Resource Impact Report for Lakeshore Farms Unit One and Hillsdale Farms	Outside
1120726	**SD-00726**	**1976**	**Kaldenberg, Russell L.**	**An Intensive Archaeological Reconnaissance of the La Costa Land Company Property Carlsbad, California**	**Intersects Project**
1120753	**SD-00753**	**1977**	**Eckhardt, William T.**	**Archaeological Survey of the Assessment Districts Number 76-1 and 76-3 San Marcos County Water District**	**Intersects Project**
1120784	SD-00784	1986	Cheever, Dayle and Dennis Gallegos	Cultural Resource Survey of Industrial Parcel #096 San Marcos, California	Outside
1120785	**SD-00785**	**1986**	**Cheever, Dayle and Dennis Gallegos**	**Cultural Resource Survey Industrial Parcel #097 San Marcos, California**	**Intersects Project**

NADB No.	SHPO ID	Year	Author(s) or Publisher	Title	Proximity To Project
1120859	SD-00859	1989	Gallegos, Dennis and Andrew Pigniolo	Cultural Resource Survey of the Rancho Santa Fe Road Alignment, Carlsbad, California	Outside
1121031	SD-01031	1983	Gallegos, Dennis	Archaeological Report for Business/Industrial, Richmar, Lake San Marcos and Barham/Discovery Community Plan, San Marcos, California	Outside
1121545	SD-01545	1980	Talley, Paige R. And Charles S. Bull	Impact Mitigation Report for Rancheros De La Costa	Outside
1121642	SD-01642	1983	Woodman, Craig F.	Cultural Resources Inventory for the Questhaven Recycling and Energy Recovery Center, San Marcos, California	Outside
1121847	SD-01847	1976	Fink, Gary R.	Archaeological Survey for the Proposed San Marcos Landfill, San Diego, California Project No. UJ0190	Outside
1121879	SD-01879	1988	Cheever, Dayle	Cultural Resource Survey of the Carrillo Ranch Road Realignment Study Area, Carlsbad, California	Outside
1122043	SD-02043	1989	Michael Brandman Associates, Inc.	Draft Environmental Impact Report San Marco Flood Control Channel San Marcos Creek/Las Posas Reach SCH #88061505	Outside
1122111	**SD-02111**	**1975**	**City of San Marcos**	**La Costa Master Plan and General Plan Amendment**	**Intersects Project**
1122123	SD-02123	1989	City of San Marcos	Initial Environment Assessment Byron White Property Specific Plan, San Marcos	Outside
1122197	SD-02197	1990	P and D Technologies	San Elijo Ranch Specific Plan Draft Environmental Impact Report	Outside
1122325	SD-02325	1992	Huey, Danielle and Dennis Gallegos	Historical/Archaeological Survey Report for the Sunset Drive to Mission Road and West Bernardo Drive to Pomerado Road Segments of the San Dieguito River Valley Park, San Diego, CA	Outside
1122661	SD-02661	1990	Smith, Brian F.	Results of an Archaeological Survey and Evaluation of Cultural Resources Within the San Elijo Ranch Specific Plan	Outside
1122920	SD-02920	1992	Kyle, Carolyn and Dennis Gallegos	Archaeological Test of Five Prehistoric Sites for the Rancho Santa Fe Road Alignment Project	Outside
1122940	SD-02940	1976	RECON	Preliminary Environmental Information on Rancho Carrillo	Outside
1123064	SD-03064	1985	Smith, Brian	An Archaeological Reconnaissance of the 1800-Acre Partin-Bennett Project, San Marcos, California	Outside
1123317	**SD-03317**	**1998**	**Kyle, Carolyn**	**Historic Property Survey Report of the San Marcos Creek Bridge**	**Intersects Project**
1123917	**SD-03917**	**1997**	**Gallegos, Dennis and Associates**	**Cultural Resource Survey Report for the Rancho Santa Fe Road Bridge Replacement Project**	**Intersects Project**

NADB No.	SHPO ID	Year	Author(s) or Publisher	Title	Proximity To Project
1124106	SD-04106	1990	Wade, Sue	A Resurvey and Assessment of the Cultural Resources of Carrillo Ranch in the City of Carlsbad, California	Outside
1124111	**SD-04111**	**1982**	**Seeman, Larry**	**Draft Environmental Impact Report Revised Parks and Recreation Element, Carlsbad, California**	**Intersects Project**
1124130	**SD-04130**	**1990**	**Pigniolo, Andrew**	**Cultural Resource Testing Program for the University Commons Project, San Marcos, California**	**Intersects Project**
1124157	SD-04157	1991	Whitney-Desautels, Nancy A.	Archaeological and Historical Literature Search and Records Check for Alternative Alignments for Highway 680 San Diego County, California	Outside
1124239	SD-04239	1976	Fink, Gary	Archaeological Survey for the Proposed San Marcos Sandfill, San Marcos, CA	Outside
1124243	SD-04243	1980	Apple, Steven	An Archaeological Assessment of SDM-915 La Costa Meadowbrook Carlsbad, CA	Outside
1124780	**SD-04780**	**1990**	**Pigniolo, Andrew and Dennis Gallegos**	**Cultural Resource Testing Program for the University Commons Project San Marcos, CA**	**Intersects Project**
1125310	**SD-05310**	**1997**	**Kyle, Carolyn**	**Negative Archaeological Survey Report District 11 County San Diego Santa Fe Road**	**Intersects Project**
1125501	SD-05501	1990	Smith, Brian F.	Results of an Archaeological Survey and Evaluation of Cultural Resources within the San Elijo Ranch Specific Plan	Outside
1125512	SD-05512	2000	Robbins-Wade, Mary	Lake San Marcos Estates	Outside
1125667	**SD-05667**	**2000**	**Harris, Nina**	**First Supplement: Rancho Santa Fe Bridge Replacement Project**	**Intersects Project**
1126164	SD-06164	1998	Gallegos, Dennis and Sinead NiGhabhláin	Archaeological Testing of Prehistoric Sites CA-SDI-9280B, CA-SDI-14025, and CA-SDI-14026 for the Questhaven Road Widening Project San Marcos, California	Outside
1126269	SD-06269	2002	Robbins-Wade, Mary	Archaeological Resources Inventory for Denk Reservoir and Unit G Parallel Pipeline, Olivenhain, San Diego County, California	Outside
1126368	SD-06368	2000	Harris, Nina	First Supplement: Rancho Santa Fe Road Bridge Replacement Project	Outside
1128052	SD-08052	1999	Gallegos, Dennis and Nina M. Harris	Cultural Resource Literature Review for the North Coast Transportation Study, Arterial Streets Alternative San Diego County, California	Outside
1128119	SD-08119	2002	Helix Environmental Planning	Lake San Marcos Estates Final Environmental Impact Report GPA99-02/R 98-003/TM 5131/Log No. 98-08-021A: Sch #2000011040 Technical Appendices	Outside
1128763	SD-08763	1976	Bull, Charles S.	An Archaeological Surface Reconnaissance of the Rancho Carrillo Area	Outside

NADB No.	SHPO ID	Year	Author(s) or Publisher	Title	Proximity To Project
1129313	SD-09313	2003	Robbins-Wade, Mary	Oceanside Boulevard and Crouch Property, Archaeological Survey (Affinis Job No. 1808)	Outside
1129314	SD-09314	2004	Robbins-Wade, Mary	Archaeological Resources Inventory for Unit G Pipeline 1 and Denk Reservoir Inlet/Outlet Project, Olivenhain, San Diego County, California	Outside
1129516	SD-09516	2005	Caterino, David	The Cemeteries and Gravestones of San Diego County: An Archaeological Study	Outside
1129553	**SD-09553**	**2003**	**Gallegos, Dennis**	**Monitoring Program for the University Commons Project San Marcos, California**	**Intersects Project**
1129560	SD-09560	2002	Guerrero, Monica and Tift, Larry	Cultural Resource Survey for the University Commons Extension Project San Marcos, California	Outside
1129824	**SD-09824**	**1983**	**Cook, John R.**	**An Archaeological Test/Mitigation of SDI-7980 and W-267**	**Intersects Project**
1130080	SD-10080	1986	Gallegos, Dennis and Dayle Cheever	Cultural Resource Survey Industrial Parcel #097 San Marcos, California	Outside
1130118	SD-10118	2006	Robbins-Wade, Mary	Archaeology Survey, Northwest Quadrant Recycled Water Pipelines Project Encinitas and Carlsbad, San Diego County, California	Outside
1130741	SD-10741	2007	Underwood, Jackson	Data Recovery of CA-SDI-11569 and CA-SDI-11570, Villages of La Costa, City of Carlsbad, California	Outside
1131605	SD-11605	2007	Bonner, Wayne H. And James M. Keasling	Cultural Resource Records Search and Site Visit Results for T-Mobile Facility Candidate SD06917 (ATC - Hi Reservoir), Near Alga Road, Carlsbad, San Diego County, California	Outside
1132706	SD-12706	2009	Bonner, Wayne and Sarah Williams	Cultural Resource Records Search and Site Visit Results for Verizon Wireless Candidate 'La Costa', 3023 Alga Road, Carlsbad, San Diego County, California	Outside
1133808	SD-13808	2000	Robbins-Wade, Mary	Lake San Marcos Estates- Archaeology (Affinis Job No. 1544)	Outside
1133976	SD-13976	2002	Robbins-Wade, Mary	Archaeological Resources Inventory for Unit G Parallel Pipeline and Denk Reservoir Inlet/ Outlet Project, Olivenhain, San Diego County, California	Outside
1134140	**SD-14140**	**2003**	**ASM Affiliates, Inc.**	**Archaeological Records Search and Literature Review, Vallecitos Water District Master Plan Update San Diego County, California**	**Intersects Project**
1135151	SD-15151	2015	Affinis	Cultural Resources Assessment of the Crown Castle/ Verizon Fiber PUC Project, San Diego, California (BCR Consulting Project No. SYN1404)	Outside

NADB No.	SHPO ID	Year	Author(s) or Publisher	Title	Proximity To Project
1137135	SD-17135	2015	PanGIS	Archaeological Survey for Pole Brushing Project, Various Locations, San Diego County, California (SDG&E eTS# 29109, PanGIS Project# 1401.07)	Outside
1137870	SD-17870	2018	EBI Consulting	Archaeological Survey Report La Costa Oaks I-A/Fuze #5037427, 7323 Sitio Salvia, Carlsbad, San Diego County, California 92009	Outside
1137922	SD-17922	2015	Environmental Assessment Specialists, Inc.	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate Sd02369a (Denk Reservoir), 7323 Sitio Salvia, Carlsbad, San Diego County, California	Outside
1138989	SD-18989	2020	ASM Affiliates, Inc.	Cultural Resource Inventory for the Diamond Industrial Project in San Marcos, California	Outside
1139035	SD-19035	2020	AECOM	Letter Report: ETS 41923 - Cultural Resources Monitoring Report for the Overhead to Underground Conversion Carlsbad Project, City of Carlsbad, San Diego County, California	Outside
1139234	SD-19234	2021	Brian F. Smith and Associates, Inc.	Cultural Resources Study for the Questhaven 64 Project, San Diego County, California (PDS2020-TM-5643; APNS 223-070-007, 223-070-008, and 223-080-046)	Outside
1139557	SD-19557	2022	ASM Affiliates	ETS 44992: Cultural Resources Monitoring Report for TCM Access Roads, Annual Report 2021, San Diego County, California (Asm #37001.11)	Outside

4.2 NATIVE AMERICAN CORRESPONDENCE

On September 18, 2018, a Sacred Lands File search request was sent to the Native American Heritage Commission (NAHC) as a part of the original Artis Senior Living Project. The NAHC responded on September 20, 2018, that the result of the search was negative. A list of tribal contacts provided by the NAHC was forwarded to the City for initiation of Assembly Bill (AB-52) consultation. The City sent opportunity to consult requests to those tribal contacts that have engaged the City to be on their Assembly Bill (AB-52) list.

During a regular consultation meeting hosted by the City in May of 2024, a Pechanga Tribal community member expressed interest in visiting and walking the Project site. This information was forwarded to Sophia Mitchell and Associates on May 15, 2024, who forwarded it to ASM for the purposes of coordinating a future site visit with the City and the Pechanga Tribe.

ASM did not initially contact the other Tribes that responded to the original Artis Senior Living Project regarding the survey of the expanded Sunrise Senior Living Center Project aside from Pechanga, who had specifically requested a site visit from the City. ASM submitted a second search of the Sacred Lands File on October 14, 2025. The NAHC responded on October 20, 2025, that the search was negative and provided a list of 31 tribal contacts to follow up with for further information. ASM mailed information request letters to the identified tribal contacts on October

29, 2025. To date, ASM has received two responses; one from the Viejas Band of Kumeyaay Indians and another from the La Posta Band of Diegueño Mission Indians. A summary of all Native American correspondences received for the Project (Artis Senior Living and Sunrise Senior Living Center) are in Table 3.

Table 3. Summary of Native American Correspondence

Date	Affiliation	Name/Department	Correspondence/Response/Action
05/2024	Pechanga Band of Indians	–	Pechanga requests a site visit for the Sunrise Senior Living Center Project during a consultation meeting with City of San Marcos.
10/11/2024	Pechanga Band of Indians	–	Pechanga requests opening of consultation with the City of San Marcos for the Sunrise Senior Living Center Project
10/15/2024	Rincon Band of Luiseño Indians	–	Rincon requests opening of consultation with the City of San Marcos for the Sunrise Senior Living Center Project
11/08/2024	San Luis Rey Band of Mission Indians	–	San Luis Rey requests opening of consultation with the City of San Marcos for the Sunrise Senior Living Center Project.
09/17/2025	City of San Marcos	–	Consultation between San Luis Rey Band of Mission Indians and City of San Marcos concluded for the Sunrise Senior Living Center Project.
10/20/2025	ASM Affiliates	–	New information request letters emailed or mailed for the updated Sunrise Senior Living Center Project to Tribal contacts identified by the NAHC on 10/15/2025
10/29/2025	Viejas Band of Kumeyaay Indians	Ray Teran, Cultural Resource Manager	Emailed letter to ASM's information outreach letter stating the Sunrise Senior Living Center Project has cultural significance to Viejas and requested a Kumeyaay Cultural monitor be on site for ground disturbing activities.
10/29/2025	La Posta Band of Diegueño Mission Indians	Eric LaChappa, Chairman	Email response to ASM's information outreach letter stating the La Posta Band would like to participate in the Sunrise Senior Living Center Project.
12/30/2025	City of San Marcos	–	Consultation between the Rincon Band of Luiseño Indians and City of San Marcos concluded for the Sunrise Senior Living Center Project.
02/05/2026	City of San Marcos	–	City of San Marcos sends last communication to the Pechanga Band of Indians regarding consultation for the Sunrise Senior Living Center Project.
02/23/2026	City of San Marcos	–	City of San Marcos considered consultation with the Pechanga Band of Indians for the Sunrise Senior Living Center Project concluded due to a lack of response to the City's 02/05/2026 letter.

Ray Teran, Resource Management Director for the Viejas Band of Kumeyaay Indians, responded by email on October 29, 2025. Mr. Teran stated that Project site has cultural significance or ties to Viejas, and cultural resources have been located within or adjacent to the Area of Potential Effects/Direct Effects of the proposed Project. Mr. Teran further stated that the Viejas Band requests a Kumeyaay Cultural Monitor be on site for ground-disturbing activities and to inform Viejas of any new developments, such as inadvertent discovery of cultural artifacts, cremation sites, or human remains. Mr. Teran concluded that Viejas will defer monitoring to a Tribe in closer proximity to the Project, if they request to perform cultural monitoring.

Eric LaChappa, Chairman for the La Posta Band of Diegueño Mission Indians, responded by email on October 29, 2025. Chairman LaChappa responded that the La Posta Band would like to participate on the Project.

In addition to ASM's information request letters, the City conducted AB-52 consultations for the current Project with the Rincon Band of Luiseño Indians starting on October 11, 2024, and with the Pechanga Band of Indians starting on October 15, 2024. Consultation with the Rincon Band was concluded as of December 30, 2025. Due to a lack of response from the Pechanga Band to a communication dated February 5, 2026, the City considered consultation closed as of February 23, 2026. The City also initiated AB-52 consultation for the current Project with the San Luis Rey Band of Mission Indians on November 8, 2024, and concluded consultation on September 17, 2025.

4.3 ARCHIVAL RESEARCH

The earliest available aerial images of the Project, dating to 1947, appear to show undeveloped land (NETR Online n.d.). The broader general vicinity farther away from the immediate Project area is a paved road (the modern Rancho Santa Fe Road) and an established dirt road connecting to and running southeast from Rancho Santa Fe Road, along with the San Marcos Creek. No changes appear until 1964, at which point a sand and gravel mine is established to the northwest along the San Marcos Creek in the broader general vicinity. By 1978, the broader general vicinity begins to undergo mass grading and initial stages of industrial development to the north. However, the Project area remains undeveloped between 1964 and 1978.

The development trend in the broader general vicinity and lack of development in the Project area continues through aerials between 1978 and 2000, the only exception being the conversion of the established dirt road identified in 1947 to a paved road by 1980. Starting with the 2002 aerial, mass grading is visible in the Project area, along with mass grading to the south and east in the broader general vicinity. By the 2005 aerials, the Project area is fully mass graded. Mass grading in the broader general vicinity to the south and east has expanded, and previously graded areas have been developed with residential buildings. The 1980 paved road, previously the 1947 dirt road, has been demolished southeast of the Project area by mass grading and development; The portion running east adjacent to the Project area remains and can be accessed via the newly built San Elijo Road, but no longer connects with Rancho Santa Fe Road. By the 2014 aerials and onward, the Project area remains undeveloped following its mass grading and has vegetation regrowing within its boundaries. The broader general vicinity is fully developed with a mix of residential and industrial buildings.

4.4 ARCHAEOLOGICAL SURVEY METHODS AND RESULTS

The original Artis Senior Living intensive-level pedestrian survey was conducted on September 19, 2018, by ASM Associate Archaeologist Jason Kjolsing and Saving Sacred Sites Native American monitor Banning Taylor (Kjolsing 2018). Mr. Kjolsing noted that the entire site had been disturbed by previous grading, landscaping, and debris dumping activities (Kjolsing 2018). Mr. Kjolsing also noted that the ground disturbance was likely due to quarrying activities.

A second intensive-level pedestrian survey of the updated Project area was conducted on February 6, 2025, by ASM Associate Archaeologist Larry Tift. Mr. Tift surveyed the entire Project area including the offsite FMZ in transects spaced approximately 15 meters apart wherever possible. Pechanga Band of Indians Native American monitor John Jackson assisted in the survey. Ground-

surface visibility within the Project area ranged from fair to poor throughout the Project area due to native and non-native vegetation regrowth and dumped construction debris. Visibility was fair in the central portion of the Project area, and poor to very poor in the northern fifth and east and western edges of the Project area. Vegetation included coyote bush, broom brush, lemonade berry, sumac, toyon, black sage, fennel, star thistle, bunch grass, and punk tree. The construction debris piles are restricted to the center of the Project and consist of broken concrete, soil, and other construction materials. Mr. Tift noted that the entire Project area appears to be heavily disturbed. No artifacts or features were identified during the survey.

A follow-up survey was conducted for the offsite fuel modification zoneFMZ on July 20, 2026, by ASM Associate Archaeologist Larry Tift. This follow-up survey, conducted in the same manner following the same methodology as the initial survey, covered approximately 1.45 acres of land located east of the Project boundary and west of San Elijo Road. Pechanga Band of Indians Native American monitor Luke Lofton assisted in the survey. This area is situated almost entirely on a steep slope. The top of the slope is highly disturbed and was either artificially created, or heavily re-contoured during prior activities at this location. A paved and abandoned portion of San Elijo Road lies at the bottom of the slope (along the east margin of the additional survey area). Additional disturbances at this location include subsurface irrigation lines, imported road base that covers the area, and evidence of vegetation clearing. The vegetation density varies within this area; low, non-native grasses cover much of the slope (including wild fennel, mustard, and Eucalyptus trees), though native regrowth has become dense in some areas (including laurel sumac, California buckwheat, toyon, and broom brush). No cultural resources were observed within the expanded survey area.

Figure 4. View of the Project area from the southeast corner, facing north-northwest. Broken concrete piles are visible in the center of the photo.

Figure 5. View of the Project area from the northern corner, facing south. Broken concrete piles are visible in the background of the photo.

Figure 6. View of the Project area from the northern corner, facing south. Heavy vegetation and a concrete ditch run along the western side of the Project.

Figure 7. View of the Project area from the central-western side, facing southwest. A retaining wall is present in the southwestern portion of the Project.

Figure 8. View of the additional survey area from the southern side, facing north.

Figure 9. Overview of additional survey area, from abandoned portion of San Elijo Road at the eastern Project boundary, facing northwest.

Figure 10. Overview of additional survey area, from the northern end of the abandoned portion of San Elijo Road, facing south.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The initial 2018 survey for the Artis Senior Living Project was negative, and the latest archaeological surveys of the current Project area (an expansion of the previous Project in 2025 and the offsite FMZ) also were negative. The records search of the Sacred Lands File held by the NAHC was negative. The CHRIS records searches at the SCIC for the Project area in 2018 and 2025 identified no previous cultural resources intersecting or within its boundaries. Historic aerials show initial mass grading of the Project area in 2002, and the Project area fully graded as of 2005. In October of 2025 ASM received responses from the Viejas and La Posta Bands to ASM's outreach regarding the current Project. The Viejas Band's response to ASM stated that the current Project is an area of cultural significance to Viejas, and the La Posta Band's response requested to participate in the Project. Both responses were forwarded to the City.

Based on the previously stated information, the Project is not expected to have an impact on archaeological resources. Although ASM did not identify any archaeological or Native American resources, the potential remains to encounter unidentified resources during Project grading activities should construction go deeper than previously disturbed depths. Additionally, the Pechanga Band previously requested site walks from the City for the Project area and consultations with the City for the current Project are assumed to be concluded as of February 23, 2026. The Rincon Band concluded consultations with the City for the current Project on December 30, 2025.

The following mitigation measures apply to grading and construction activities that occur within areas of previously unmonitored areas, as determined by a Qualified Archaeologist and a TCA Native American Monitor, and would be required as a condition of Project approval:

MM-CR-1A: PRE-EXCAVATION AGREEMENT

Prior to the issuance of a Grading Permit, or ground-disturbing activities, the Applicant/Owner shall enter into a Tribal Cultural Resources Treatment and Repatriation Agreement (Pre-Excavation Agreement) with a Traditionally and Culturally Affiliated Native American Tribe (TCA Tribe), identified in consultation with the City. The purpose of the Pre-Excavation Agreement shall be to formalize protocols and procedures between the Applicant/Owner and the TCA Tribe for the protection, treatment, and repatriation of Native American human remains, funerary objects, cultural and/or religious landscapes, ceremonial items, traditional gathering areas, and other tribal cultural resources. Such resources may be located within and/or discovered during ground-disturbing and/or construction activities for the proposed Project, including any additional culturally appropriate archaeological studies, excavations, geotechnical investigations, grading, preparation for wet and dry infrastructure, and other ground-disturbing activities. Any Project-specific Monitoring Plans and/or excavation plans prepared by the Project archaeologist shall include the TCA Tribe requirements for protocols and protection of tribal cultural resources that were agreed to during the tribal consultation.

The landowner shall relinquish ownership of all non-burial related tribal cultural resources collected during construction monitoring and from any previous archaeological studies or excavations on the Project site to the TCA Tribe for proper treatment and disposition per the Pre-Excavation Agreement, unless ordered to do otherwise by responsible agency or court of

competent jurisdiction. The requirement and timing of such release of ownership, and the recipient thereof, shall be reflected in the Pre-Excavation Agreement. If the TCA Tribe does not accept the return of the cultural resources, then the cultural resources will be subject to curation.

MM-CR-1B: CONSTRUCTION MONITORING

Prior to the issuance of a Grading Permit or ground-disturbing activities, the Applicant/Owner or Grading Contractor shall provide written documentation (either as signed letters, contracts, or emails) to the City's Planning Division stating that a Qualified Archaeologist and Traditionally and Culturally Affiliated Native American monitor (TCA Native American monitor) have been retained at the Applicant/Owner or Grading Contractor's expense to implement the construction monitoring program, as described in the Pre-Excavation Agreement.

The Qualified Archaeologist and TCA Native American monitor shall be invited to attend all applicable pre-construction meetings with the General Contractor and/or associated subcontractors to present the construction monitoring program. The Qualified Archaeologist and TCA Native American monitor shall be present on site during grubbing, grading, trenching, and/or other ground-disturbing activities that occur in areas of native soil or other permeable natural surfaces that have the potential to unearth any evidence of potential archaeological resources or tribal cultural resources. In areas of artificial paving, the Qualified Archaeologist and TCA Native American monitor shall be present on site during grubbing, grading, trenching, and/or other ground-disturbing activities that have the potential to disturb more than six inches below the original pre-Project ground surface to identify any evidence of potential archaeological or tribal cultural resources. No monitoring of fill material, existing or imported, will be required if the General Contractor or developer can provide documentation to the satisfaction of the City that all fill materials being utilized at the site are either: 1) from existing commercial (previously permitted) sources of materials; or 2) are from private or other non-commercial sources that have been determined to be absent of tribal cultural resources by the Qualified Archaeologist and TCA Native American monitor.

The Qualified Archaeologist and TCA Native American monitor shall maintain ongoing collaborative coordination with one another during all ground-disturbing activities. The requirement for the construction monitoring program shall be noted on all applicable construction documents, including demolition plans, grading plans, etc. The Applicant/Owner or Grading Contractor shall provide written notice to the Planning Division and the TCA Tribe, preferably through e-mail, of the start and end of all ground-disturbing activities.

Prior to the release of any grading bonds, or prior to the issuance of any Project Certificate of Occupancy, an archaeological monitoring report, which describes the results, analysis, and conclusions of the construction monitoring shall be submitted by the Qualified Archaeologist, along with any TCA Native American monitor's notes and comments received by the Qualified Archaeologist, to the Planning Division Manager for approval. Once approved, a final copy of the archaeological monitoring report shall be retained in a confidential City Project file and may be released, as a formal condition of AB-52 consultation, to Pechanga Band of Indians, Rincon Band of Luiseño Indians, San Luis Rey Band of Mission Indians, or any parties involved in the Project-specific monitoring or consultation process. A final copy of the report, with all confidential site records and appendices, will be submitted to the SCIC after approval by the City.

MM-CR-1C: UNANTICIPATED DISCOVERY PROCEDURES

Both the Qualified Archaeologist and the TCA Native American monitor may temporarily halt or divert ground-disturbing activities if potential archaeological resources or tribal cultural resources are discovered during construction activities. Ground-disturbing activities shall be temporarily directed away from the area of discovery for a reasonable amount of time to allow a determination of the resource's potential significance. Isolates and clearly non-significant archaeological resources (as determined by the Qualified Archaeologist, in consultation with the TCA Native American monitor) will be minimally documented in the field. All unearthed archaeological resources or tribal cultural resources will be collected, temporarily stored in a secure location (or as otherwise agreed upon by the Qualified Archaeologist and the TCA Tribe), and repatriated according to the terms of the Pre-Excavation Agreement, unless ordered to do otherwise by responsible agency or court of competent jurisdiction.

If a determination is made that the archaeological resources or tribal cultural resources are considered potentially significant by the Qualified Archaeologist, the TCA Tribe, and the TCA Native American monitor, then the City and the TCA Tribe shall determine, in consultation with the Applicant/Owner and the Qualified Archaeologist, the culturally appropriate treatment of those resources.

If the Qualified Archaeologist, the TCA Tribe, and the TCA Native American monitor cannot agree on the significance or mitigation for such resources, these issues will be presented to the Planning Division Manager for decision. The Planning Division Manager shall make a determination based upon the provisions of CEQA and California Public Resources Code Section 21083.2(b) with respect to archaeological resources and California Public Resources Section 21704 and 21084.3 with respect to tribal cultural resources, and shall take into account the religious beliefs, cultural beliefs, customs, and practices of the TCA Tribe.

All sacred sites, significant tribal cultural resources, and/or unique archaeological resources encountered within the Project area shall be avoided and preserved as the preferred mitigation. If avoidance of the resource is determined to be infeasible by the City as the Lead Agency, then the City shall require additional culturally appropriate mitigation to address the negative impact to the resource, such as, but not limited to, the funding of an ethnographic study and/or a data recovery plan, as determined by the City in consultation with the Qualified Archaeologist and the TCA Tribe. The TCA Tribe shall be notified and consulted regarding the determination and implementation of culturally appropriate mitigation and the drafting and finalization of any ethnographic study and/or data recovery plan, and/or other culturally appropriate mitigation. Any archaeological isolates or other cultural materials that cannot be avoided or preserved in place as the preferred mitigation shall be temporarily stored in a secure location on site (or as otherwise agreed upon by the Qualified Archaeologist and TCA Tribe) and repatriated according to the terms of the Pre-Excavation Agreement, unless ordered to do otherwise by responsible agency or court of competent jurisdiction. The removal of any artifacts from the Project site will be inventoried with oversight by the TCA Native American monitor.

If a data recovery plan is authorized as indicated above and the TCA Tribe does not object, then an adequate artifact sample to address research avenues previously identified for sites in the area will be collected using professional archaeological collection methods. If the Qualified

Archaeologist collects such resources, the TCA Native American monitor must be present during any testing or cataloging of those resources. Moreover, if the Qualified Archaeologist does not collect the cultural resources that are unearthed during the ground-disturbing activities, the TCA Native American monitor may, at their discretion, collect said resources for later reburial or storage at a local curation facility, as described in the Pre-Excavation Agreement.

In the event that curation of archaeological resources or tribal cultural resources is required by a superseding regulatory agency, curation shall be conducted by an approved local facility within San Diego County, and the curation shall be guided by California State Historical Resources Commission's Guidelines for the Curation of Archaeological Collections. The City shall provide the Applicant/Owner final curation language and guidance on the Project grading plans prior to issuance of the grading permit, if applicable, during Project construction. The Applicant/Owner shall be responsible for all repatriation and curation costs and provide to the City written documentation from the TCA Tribe or the curation facility, whichever is most applicable, that the repatriation and/or curation have been completed.

MM-CR-1D: HUMAN REMAINS

As specified by California Health and Safety Code Section 7050.5, if human remains, or remains that are potentially human, are found on the Project site during ground-disturbing activities or during archaeological work, the person responsible for the excavation, or his or her authorized representative, shall immediately notify the San Diego County Medical Examiner's Office by telephone. No further excavation or disturbance of the discovery or any nearby area reasonably suspected to overlie adjacent remains (as determined by the Qualified Archaeologist and/or the TCA Native American monitor) shall occur until the Medical Examiner has made the necessary findings as to origin and disposition pursuant to Public Resources Code 5097.98.

If such a discovery occurs, a temporary construction exclusion zone shall be established surrounding the area of the discovery so that the area would be protected (as determined by the Qualified Archaeologist and/or the TCA Native American monitor), and consultation and treatment could occur as prescribed by law. As further defined by State law, the Medical Examiner will determine within two working days of being notified if the remains are subject to his or her authority. If the Medical Examiner recognizes the remains to be Native American, and not under his or her jurisdiction, then he or she shall contact the NAHC by telephone within 24 hours. The NAHC will make a determination as to the Most Likely Descendent, who shall be afforded 48 hours from the time access is granted to the discovery site to make recommendations regarding culturally appropriate treatment.

If suspected Native American remains are discovered, the remains shall be kept in situ (in place) until after the Medical Examiner makes its determination and notifications, and until after the Most Likely Descendent is identified, at which time the archaeological examination of the remains shall only occur on site in the presence of the Most Likely Descendent. The specific locations of Native American burials and reburials will be proprietary and not disclosed to the general public. According to California Health and Safety Code, six or more human burials at one location constitute a cemetery (Section 8100), and disturbance of Native American cemeteries is a felony (Section 7052). In the event that the Applicant/Owner and the Most Likely Descendant are in disagreement regarding the disposition of the remains, State law will apply, and the mediation

process will occur with the NAHC. In the event that mediation is not successful, the landowner shall rebury the remains at a location free from future disturbance (see Public Resources Code Section 5097.98(e) and 5097.94(k)).

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APPENDICES

APPENDIX A

SCIC Record Search

CONFIDENTIAL APPENDIX B

NAHC SLF Request and Tribal Outreach