Cultural Resources Technical Report

Campus Point Drive Storm Drain Replacement Project

July 2024

Prepared for:

The City of SAN DIEGO

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Acronyms and Abbreviations

°F	degrees Fahrenheit
2008 General Plan	2008 City of San Diego General Plan
AB	Assembly Bill
APE	area of potential effects
CEQA	California Environmental Quality Act
CHRIS	California Historical Resources Information System
City	City of San Diego
County	County of San Diego
CRHR	California Register of Historical Resources
CRTR	Cultural Resources Technical Report
Harris	Harris & Associates
MLD	most likely descendant
NAGPRA	Native American Graves Protection and Repatriation Act
NAHC	Native American Heritage Commission
NRHP	National Register of Historic Places
project	Campus Point Drive Storm Drain Replacement Project
SDMC	San Diego Municipal Code

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Executive Summary

At the request of the City of San Diego (City) Engineering & Capital Projects Department (project applicant), Harris & Associates (Harris) has prepared this Cultural Resources Technical Report (CRTR) in support of the Campus Point Drive Storm Drain Replacement Project (project). The 12.62-acre survey area occurs within the University City neighborhood of San Diego, and the project consists of replacing a storm drain that is partially undergrounded and in disrepair, resulting in the severe erosion of the steep canyon slope in which the majority of the storm drain is located. Other project activities would include installation of associated cut-off walls, concrete energy dissipators, riprap, slope repair, and revegetation.

This CRTR is intended to provide the results of the Phase I cultural survey and provide a project-level analysis of the potential impacts that could occur to cultural resources as a result of project implementation. An evaluation of cultural resources was conducted through a review of background data from the California Historical Resources Information System (CHRIS), information from the Native American Heritage Commission (NAHC), Tribal outreach, and data collected during the Phase I cultural survey. No known resources were identified during the background research, and no resources were identified during the cultural survey. Ground visibility was poor (only 1–2 percent); therefore, it is recommended that an Archaeological and Tribal Monitoring Program be implemented. A copy of this CRTR will be submitted to the South Coastal Information Center upon approval from the lead agency.

The project is required to comply with all federal, state, and local regulations applicable to cultural resources.

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Section 1 Introduction

At the request of the City of San Diego (City) Engineering & Capital Projects Department (project applicant), Harris & Associates (Harris) has conducted a Phase I cultural survey in support of the proposed Campus Point Drive Storm Drain Replacement Project (project) in the City of San Diego, California.

1.1 Purpose of the Report

The purpose of this Cultural Resources Technical Report (CRTR) is to document the cultural resources present on the project site; identify potential impacts to cultural resources associated with implementation of the project; and identify avoidance, minimization, or mitigation measures consistent with federal, state, and local rules and regulations, including the San Diego Municipal Code (SDMC) Historical Resources Guidelines (City of San Diego 2024), City's Historical Resource Technical Report Guidelines and Requirements (City of San Diego 2012), and City's California Environmental Quality Act (CEQA) Significance Determination Thresholds (City of San Diego 2022). This CRTR includes an introduction; a discussion of project setting, which includes the project description, project location, environmental setting, cultural setting, previous investigations, and federal, state, and local regulations applicable to cultural resources; methods for the Phase I cultural survey conducted for the project and its limitations; findings of the Phase I cultural survey; an interpretation of resource importance and impacts identified; management considerations, including avoidance and minimization measures and design considerations; a references list; and a list of preparers and persons and organizations contacted in preparation of this CRTR.

The term "historical resources" refers to buildings, structures, signs, features, place names, objects, archaeological sites, districts, landscapes possessing physical evidence of human activities that are typically over 45 years old, and Traditional Cultural Properties and Resources. The term "Traditional Cultural Property" refers to property that is eligible for inclusion in the National Register of Historic Places (NRHP) because of its association with cultural practices or beliefs of a living community that (1) are rooted in that community's history and (2) are important in maintaining the continuing cultural identity of the community.

The cultural investigation described in this CRTR was implemented to support the City's responsibilities under CEQA and the SDMC to reduce or eliminate impacts to cultural resources resulting from implementation of the project.

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Section 2 Project Setting

2.1 Project Description

The project includes the demolition of approximately 142 linear feet of existing 18-inch-diameter corrugated metal pipe and catch basin and installation of approximately 325 linear feet of 24-inch-diameter reinforced concrete pipe storm drain, including associated cut-off walls for steep terrain installations, and installation of one concrete energy dissipator with riprap to reduce the flow velocity from the outfall structure. Small sections of existing reinforced concrete brow ditches immediately north and south of the existing 18-inch-diameter corrugated metal pipe that would be replaced are also damaged and would be removed and replaced. Additionally, new catch basins would be installed to intercept stormwater runoff coming down the hill, and direct it into the new 24-inch-diameter storm drain pipe. Eroded sections of the existing slope would be repaired by grading and backfilling per project geotechnical recommendations, and all disturbed areas would be revegetated per City requirements and a Revegetation Plan, which would include using both container plants and an approved hydroseed mix and a 25-month maintenance and monitoring period. Backfill would be free of biodegradable/organic-rich material, hazardous substance contamination, other deleterious debris, and rocks or hard lumps greater than 6 inches, and would consist of predominantly granular soil. Staging of materials is expected to occur within the project site boundaries and the existing dirt access roads.

The cultural resources study consists of a desktop literature review of the project site and evaluation of resources. Harris senior archaeologist Donna Beddow, RPA, who served as the principal investigator, meets the Secretary of the Interior's Professional Standards for Archaeology (Appendix A, Resumes).

2.2 Project Location

The project site is in the University City neighborhood of San Diego within the City of San Diego's University Community Plan Area, which is generally bordered by La Jolla to the west, State Route 52 to the south, and Interstate 805 to the east (Appendix B, Figures; Figure 1, USGS Topographic Map). The project site is linear, beginning in the west at the edge of Campus Point Drive and extending northeast and down a steep canyon slope composed of native and non-native vegetation and ending at the canyon bottom through which existing dirt access roads traverse (Figure 2, Project Location; Appendix C, Photographs). The project site is immediately surrounded on the northern, eastern, and southern sides by an undeveloped, steep-slope canyon and bordered on the western side by dense commercial development.

2.3 Environmental Setting

2.3.1 Natural Environment

The project site is generally within and immediately surrounded by Campus Point Open Space and developed/landscaped areas. Most of the survey area occurs on the western slope of a canyon in the University City neighborhood of the City. The canyon slope that makes up most of the survey area contains native and non-native vegetation communities and land cover types and is largely undeveloped due to the slope's steepness. Evidence of unhoused encampments, trash, and debris was observed at various locations along the slope. The urban areas within the western portion of the survey area include the Campus Point Drive roadway and parts of a corporate office campus, Nissan Design America, which is surrounded by medical campuses, industrial buildings, residential areas, a Jewish Community Recreation Center, and a high school. Historical imagery suggests that development in the area began between 1953 and 1964 (NETR Online 2024).

The topography of the survey area is variable—the western portion begins on a mesa top, extends downslope of a steep-sided canyon, crosses the canyon floor, and begins to climb back up the opposite slope of the canyon. The elevation in the survey area ranges from approximately 200 to 360 feet above mean sea level.

2.3.1.1 Climate

On a regional level, San Diego County (County) has a Mediterranean climate, which is characterized by wet winters and dry summers. This is largely because a semi-permanent high-pressure zone sits over the Pacific Ocean during much of the year and forms a fog belt (marine layer). Generalized climate in the region is dry, subhumid mesothermal, with warm dry summers and cold moist winters, which pushes the growing season to the wet months of the year (late winter to early spring).

The closest Natural Resources Conservation Service weather station to the project site is the San Diego International Airport, approximately 10 miles south of the project site. Between 2004 and 2024, the average maximum temperature was 71 degrees Fahrenheit (°F), and the average minimum temperature was 58.5°F. The average annual precipitation during this time period was 9.60 inches. In 2023, the total rainfall was 14.43 inches, approximately 8.53 inches greater than in 2022 (NRCS 2024).

2.3.1.2 Flora and Fauna

Harris biologists conducted a biological survey of the project site in late winter 2024. Seven vegetation communities and land use types were observed on the project site: Diegan coastal sage scrub, eucalyptus woodland, emergent wetland, non-vegetated channel, southern arroyo willow riparian forest, disturbed habitat, and urban/developed land (Harris 2024).

The Biological Resources Technical Report notes that 74 plant taxa were observed in the survey area, 32 (43 percent) of which were native species and 42 (57 percent) of which were non-native species. Of the plants observed in the survey area, one is designated sensitive. In addition, 28 wildlife species— three invertebrates, one amphibian, 21 birds, and three mammals (or evidence thereof)—were observed in the survey area. Of the 28 wildlife species observed in the survey area, two are designated sensitive (Harris 2024).

2.4 Cultural Setting

2.4.1 Prehistoric

Cultural resources found throughout the City are reminders of the City's historical record. Cultural resources are the tangible or intangible remains or traces left by prehistoric or historical people who inhabited the San Diego region. They encompass both built (post-1769) and archaeological environments, as well as Traditional Cultural Properties; are typically in protected areas near water sources and multiple ecoregions; and can include Traditional Cultural Places, such as gathering areas, landmarks, and ethnographic locations.

The following provides a brief cultural background for the City.

2.4.1.1 Paleoindian Period (Pre-5500 BC)

Several terms are used for the early occupation of the San Diego region and include Paleoindian period, Early Archaic period, Initial period, and Scraper Maker period (Moratto 1984). The Paleoindian period dates from 9000 to 5500 BC (Chartkoff and Chartkoff 1984; Moratto 1984; Rogers 1966; Taylor and Meighan 1978; Warren and True 1961). Early humans have been characterized as an early nomadic, hunting culture whose settlements were on mesas and ridge tops and in deserts (Erlandson and Colton 1991; Rogers 1966; Wallace 1978; Warren et al. 1961). During this period, inhabitants relied on large game for subsistence (Rogers 1966; Warren et al. 1961) and produced "finely worked blades, spear points, choppers, and scrapers out of fine-grained volcanics" (Carrico 1977). In addition, leaf-shaped knives, foliate to ovoid bifaces, foliate to short-bladed shoulder points, crescents, engraving tools, core hammers, pebble hammers, and cores were part of the tool assemblage (Moratto 1984; Wahoff and Dolan 2000). Pottery and milling stones were missing from the assemblage, confirming the assumption that hunting was an economic focus for the culture (Moriarty 1967; Warren and True 1961). Because the tool assemblage was similar to desert cultures of the Mojave Desert, it is believed that this culture migrated west from the desert into California (Gallegos 1995; Rogers 1939). However, no single hypothesis is universally accepted. Other hypotheses identify the movement of people into California from the south and north down the coast (Taylor and Meighan 1978; Chartkoff and Chartkoff 1984).

2.4.1.2 Archaic (8000 BC–AD 500)

According to Hale et al. (2018), "the more than 1500-year overlap between the presumed age of Paleoindian occupations and the Archaic period highlights the difficulty in defining a cultural chronology in the San Diego region." The Archaic period is also known as La Jollan, Millingstone Horizon, and Encinitas Tradition. This period is characterized by the presence of dart points, milling equipment, scattered hearths, shell middens, and flexed burials (Carrico 1977). Subsistence strategies placed an emphasis on gathering, possibly as a result of environmental change (Wahoff and Dolan 2000; Wallace 1978). The assemblage was composed of milling implements and cobble/core-based tools. The flaked tools do not appear to be as refined as those of the Paleoindian period. Mortuary goods included shell beads and ornaments, projectile points, and milling implements. Wallace (1978) interpreted archaeological sites of this period as an indication of an increase in population and permanence. Site types included coastal shell habitation bases, quarries, resource exploitation, and milling (Gallegos 1995). The sites are typified by an abundance of shellfish remains and are situated near sloughs and lagoons and on the open coast (Carrico 1977; Masters and Gallegos 1997; Moratto 1984; Wallace 1978). An inland manifestation identified as the Pauma complex is known to have existed (True 1958). Unlike the coastal people, this complex occupied "transverse valleys and sheltered canyons of inland San Diego county, ha[d] an emphasis on hunting and gathering, had a greater diversity of tool types, and lacked shellfish remains" (Masters and Gallegos 1997:12).

Similar to the Paleoindian period, controversy surrounds the origins of the Archaic culture. Several hypotheses have been postulated. Kaldenberg (1976) and Moriarty (1967) proposed that the transition from the Paleoindian to the Archaic culture was an in-situ adaptation. In contrast, Warren et al. (1961) viewed this transition as a migration from the desert to the coast due to the adverse environmental condition of the Altithermal. Taylor and Meighan (1978:36) did not take a single position regarding the transition to the Archaic culture but, rather, incorporated the hypotheses as identified below:

> The artifact inventory and cultural activities argue strongly that this stage began in the desert inland and spread toward the Pacific Coast, reaching it about 8500 years ago. There is no evidence to show whether the Milling Stone Stage involved movement of the people or a conquest of earlier residents; perhaps the early hunters simply adopted this way of life as game animals became scarce.

The population of this period focused on lagoonal resources and moved up and down the river valleys, exploiting various inland and coastal resources (Masters and Gallegos 1997).

2.4.1.3 Late Prehistoric (AD 500–1769)

The Late Prehistoric period is an antecedent to Spanish contact (AD 1000–1769). It was a "time of cultural transformations brought about by trait diffusion, immigration, and *in-situ* adaptation to

environmental changes" (Moratto 1984:153). Subsistence strategies focused on terrestrial collection and hunting (Christenson 1992); however, shellfish and other maritime resources were also used. Settlement included large villages near permanent water sources, temporary campsites, quarries, and resource exploitation sites. Small triangular points, pottery, and Obsidian Butte obsidian are characteristic of this period (Christenson 1992; Masters and Gallegos 1997; True 1966, 1970). Cremations replaced flexed inhumations, and mortuary goods became more elaborate (Wallace 1955). Cremations are believed to have been introduced into the area during the Late Prehistoric period and are the result of Shoshonean intrusion (1500 BP) from the deserts (True 1966) into northern San Diego County. However, in the southern part of the County, this practice has been attributed to a "Colorado River origin that may have had an influence as far reaching as the Hohokam [current day Pima people and Tohono O'odham Nation] in southwestern Arizona" (True 1970:58). Kaldenberg (1976:67) had a different opinion on the origin and timing of the entrance of cremation practices into the region. He noted that the practice of cremation was introduced at the terminus of the Archaic culture (3000 BP) with the "migration of Yuman people into the San Diego coastal region." By 2000 BP, inhumations were replaced by cremations (Kaldenberg 1976).

Two complexes (San Luis Rey and Cuyamaca) are identified with the Late Prehistoric period. True (1966) believed that the San Luis Rey complex was a precursor to the ethnographic Luiseño. Similarly, he suggested that the Cuyamaca complex was the predecessor to the ethnographic Kumeyaay. Through the examination of both geographic regions, True identified specific characteristics unique to each; however, he noted that, although geographically similar, these two cultures were distinctly different.

2.4.2 Ethnohistoric Period (Post-AD 1769)

The Ethnohistoric period begins with the first permanent European settlements. Early Ethnohistoric accounts and mission documents have been used to reconstruct this period (Hale et al. 2018). Shipek (1993) delineated the boundaries between the Luiseño and the Kumeyaay as follows:

> In 1769, the Kumeyaay national territory started at the coast about 100 miles south of the Mexican border (below Santo Tomas), thence north to the coast at the drainage divide south of the San Luis Rey River including its tributaries. Using the U.S. Geological Survey topographic maps, the boundary with the Luiseño then follows that divide inland. The boundary continues on the divide separating Valley Center from Escondido and then up along Bear Ridge to the 2240 contour line and then north across the divide between Valley Center and Woods Valley up to the 1880-foot peak, then curving around east along the divide above Woods Valley.

The Kumeyaay (also known as Ipai/Tipai, Diegueño, and Kamia) lived in small villages, or rancherias, and would inhabit multiple locations throughout the year. According to Cline (1984), the typical settlement included two or more seasonal villages with temporary camps farther away

from the main central villages. Hunting and gathering were the main economic focus, consisting of small game, acorns, grass seeds, and other plant resources. Similar to the Prehistoric period, a wide range of tools (chipped and ground stone) made from locally available materials were used. Exotic materials, such as obsidian and chert, were imported from the deserts to the north and east. In addition to lithic tools, the Kumeyaay produced baskets and pottery.

2.4.3 Historical Period (Post-AD 1542)

The Historical period can be divided into three phases (Spanish, Mexican, and American). Each phase is identified with a change in political power. Common goals in each phase included land gain, assimilation of the native population, and the attainment of wealth. However, these periods were dissimilar in the rationale behind these goals. Rationale included defense (Spain), independence and secularization (Mexico), and expansion and economics (United States). Assimilation of Native Californians was a desire of each government that came to power; however, the greatest misfortune of this period was the large decline in Native American populations (Phillips 1981).

2.4.3.1 Spanish Period (AD 1769–1821)

Although the first Spanish contact occurred in 1542, it was not until 1769 that the first permanent settlement was established. The Spanish period was a time of European expansionism and is typically identified with the mission system. In addition, presidios (military defense) and pueblos (city government) played an important role in the structuring of the community (Campbell 1977). The mission system was the institution designated for the assimilation and exploitation of native people (Campbell 1977; Cline 1979; Jackson and Castillo 1995; Phillips 1981). Jackson and Castillo (1995:6) identified this exploitation as an extension of the "sixteenth-century policy of *congregación/reducción*." In contrast, Costo (1987) noted that the transference of the Spanish Inquisition (originally established in 1478) to the New World was the mechanism for this exploitation because the inquisition contained economic and religious incentives. The Spanish stronghold in California declined with Spain's loss of the Napoleonic Wars (1803–1815), which eliminated funding to the mission.

2.4.3.2 Mexican Period (AD 1821–1859)

Mexican independence from Spain occurred in 1821, and in 1833, Mexico secularized the missions. After secularization, large tracts of land were granted to private citizens. "The secularization of the missions during the Mexican period is usually regarded as a watershed in California history because it resulted in the replacement of one Hispanic institution by another – the rancho for the mission" (Phillips 1981:33). Like the mission, the rancho became the institution of native exploitation. This period experienced an increase in cattle ranching and the hide and tallow trade (Gallegos 1995; Wahoff and Dolan 2000). The passage of the Treaty of Guadalupe Hidalgo that ended the Mexican-American War in 1848 was the final event that culminated the Mexican period in California.

2.4.3.3 American Period (Post-AD 1850)

The concept of a two-ocean economy and the California Gold Rush were the impetus that brought about the annexation of California (1850) to the United States. A large number of immigrants entered California with the discovery of gold and the availability of free land with the passage of the Homestead Act (1863). This population increase caused the displacement of Native Californians and brought about a deterioration in their rituals and traditions (Carrico 1986; Gallegos 1995). During this period, the ranchos experienced a decline primarily in response to their inability to validate land ownership as a result of the California Land Claims Act of 1851. "With the discovery of gold, the building of the transcontinental railroad, and the development of crops and cities, people in massive numbers from all parts of the world began to inhabit the region" (Phillips 1981: editors' introduction).

2.5 Previous Investigations

Record searches were conducted for the project's area of potential effects (APE), which includes the project site and a 1-mile buffer around the site. The 1-mile buffer includes all off-site improvements areas. Staff conducted the records search using the California Historical Resources Information System (CHRIS) (Confidential Appendix D, CHRIS Background Data). One hundred and sixty-two studies have been conducted within a 1-mile radius, and two of the studies (Table 1, Previous Studies within the Project Area of Potential Effects) intersect with the APE. Twenty-eight cultural resources and one historic address are documented within the 1-mile buffer; however, no known resources or historic addresses occur within the survey area.

Resources in the records search area include prehistoric (lithic, scatters, ceramic scatters, shell scatters, faunal, burials, hearths, and isolates), and historic (bridges, railroad, foundations, and water conveyance system) sites. The complete listing of reports, resources, and historic addresses for the search area is provided in Confidential Appendix D.

The nearest resource (P-37-009288) is approximately 0.21 mile south of the survey area. It was originally recorded by David Hanna in 1980; however, it was originally noted by Loughlin and Ezell in 1974 in an Environmental Impact Report for S.A.I. According to Greenlee and Letter 2011:

> The site includes three distinct loci. Locus A was originally recorded as a La Jollan sparse shell scatter with flakes and manos. Locus B is a prehistoric shell midden containing Donax gouldii shell fragments and one piece of debitage. Locus C is a pile of midden soil scraped and deposited from another area (possibly Locus B). Since the initial recording of these loci, all three have been destroyed due to development along Interstate 5 and Voigt Drive (formerly Miramar Road).

Table 1. Previous Studies within the Project Area of Potential Effects

Report ID	Title	Author	Year
SD-10885	Archaeological and Geospatial Investigations of Fire-Altered Rock Features at Torrey Pines State Reserve, San Diego, California	Scott A. Mattingly	2007
SD-17232	San Diego 56 Fiber Project, San Diego County, California (BCR Consulting Project No. SYN1628)	David Brunzell	2017

2.6 Applicable Regulations

Cultural resource regulations that apply to the project site include provisions of CEQA, the California Health and Safety Code, and the California Register of Historical Resources (CRHR). Historical and archaeological districts, sites, buildings, structures, and objects are assigned significance based on their exceptional value or quality in illustrating or interpreting the heritage of the City in history, architecture, archaeology, engineering, and culture. A number of criteria are used in demonstrating resource importance.

2.6.1 Federal Level Regulations

2.6.1.1 National Register of Historic Places

The NRHP is the nation's official list of historic places. The NRHP is overseen by the National Park Service and requires that a property or resource eligible for listing in the NRHP meet one or more of the following four criteria at the national, state, or local level to ensure integrity and to obtain official designation:

a. The property is associated with events that have made a significant contribution to the broad patterns of our history.
b. The property is associated with the lives of persons significant to our past. Eligible properties based on this criterion are generally those associated with the productive life of the individual in the field in which the person achieved significance.
c. The property embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic value, or represents a significant and distinguishable entity whose components lack individual distinction.
d. The property has yielded, or is likely to yield, information important to prehistory or history.

In addition to meeting at least one of these four criteria, listed properties must also retain sufficient physical integrity of those features necessary to convey historic significance. The register has identified the following seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association.

Properties are nominated to the NRHP by the State Historic Preservation Officer of the state where the property is located, by the federal preservation officer for properties under federal ownership

or control, or by the Tribal preservation officer if on Tribal lands. Listing in the NRHP provides formal recognition of a property's historic, architectural, or archaeological significance based on national standards. Documentation of a property's historic significance helps provide for the preservation of the resource.

2.6.2 State Level Regulations

2.6.2.1 California Environmental Quality Act

According to CEQA, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing in the CRHR (California Public Resources Code, Section 5024.1; 14 CCR 4852), including the following:

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

The fact that a resource is not listed in or determined to be eligible for listing in the CRHR, not included in a local register of historical resources (pursuant to California Public Resources Code, Section 5020.1[k]), or not identified in a historical resources survey (meeting the criteria in Section 5024.1[g] of the CEQA Guidelines) does not preclude a lead agency from determining that the resource may be a historical resource as defined in California Public Resources Code, Section 5020.1(j) or 5024.1.

2.6.2.2 California Register of Historical Resources (California Public Resources Code, Section 5020 et seq.)

In California, the term "historical resource" includes but is not limited to "any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California" (California Public Resources Code, Section 5020.1[j]). In 1992, the California Legislature established the CRHR "to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (California Public Resources Code, Section 5024.1[a]). A resource is eligible for listing in the CRHR if the State Historical Resources Commission determines that it is a significant resource and that it meets any of the following NRHP criteria (California Public Resources Code, Section 5024.1[c]):

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

Resources less than 50 years old are not generally considered for listing in the CRHR but may be considered if it can be demonstrated that sufficient time has passed to understand the historical importance of the resources (14 CCR 4852[d][2]).

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historical resources. The criteria for the CRHR are nearly identical to those for the NRHP, and properties listed or formally designated as eligible for listing in the NRHP are automatically listed on the CRHR, as are the state landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys. The State Historic Preservation Officer maintains the CRHR.

2.6.2.3 California Health and Safety Code, Section 7050.5

California law protects Native American burials, skeletal remains, and associated grave goods regardless of their antiquity and provides for the sensitive treatment and disposition of those remains. California Health and Safety Code, Section 7050.5, requires that, if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the County Coroner has examined the remains (California Health and Safe Code, Section 7050.5b). If the County Coroner determines or has reason to believe the remains are those of a Native American, they must contact the Native American Heritage Commission (NAHC) within 24 hours (California Health and Safe Code, Section 7050.5c). The NAHC will notify the most likely descendant (MLD). With the permission of the landowner, the MLD may inspect the site of discovery. The inspection must be completed within 24 hours of notification of the MLD by the NAHC. The MLD may recommend means of treating or disposing of, with appropriate dignity, the human remains and items associated with Native Americans.

2.6.3 City of San Diego

2.6.3.1 2008 City of San Diego General Plan

The Historic Preservation Element of the 2008 City of San Diego General Plan (2008 General Plan) includes the following cultural resources goals:

A. Identification and Preservation of Historical Resources

- Identification of the historical resources of the City.
- Preservation of the City's important historical resources.
- Integration of historic preservation planning in the larger planning process.

Policies of this goal include the following:

- **HP-A.1:** Strengthen historic preservation planning.
- **HP-A.2:** Fully integrate the consideration of historical and cultural resources in the larger land use planning process.
- **HP-A.3:** Foster government-to-government relationships with the Kumeyaay/Diegueño Tribes of San Diego.
- **HP-A.4:** Actively pursue a program to identify, document and evaluate the historical and cultural resources in the City of San Diego.
- **HP-A.5:** Designate and preserve significant historical and cultural resources for current and future generations.

B. Historic Preservation, Education, Benefits, and Incentives

- Public education about the importance of historical resources.
- Provision of incentives supporting historic preservation.
- Cultural heritage tourism promoted to the tourist industry.

Policies of this goal include the following:

- **HP-B.1:** Foster greater public participation and education in historical and cultural resources.
- **HP-B.2:** Promote the maintenance, restoration, and rehabilitation of historical resources through a variety of financial and development incentives. Continue to use existing programs and develop new approaches as needed. Encourage continued private ownership and utilization of historic structures through a variety of incentives.
- **HP-B.3:** Develop a historic preservation sponsorship program.
- **HP-B.4:** Increase opportunities for cultural heritage tourism.

2.6.3.2 City of San Diego Municipal Code Historical Resources Guidelines

The purpose and intent of the SDMC Historical Resources Guidelines (Chapter 14, Division 3, Article 2) are to protect, preserve, and where damaged, restore the City's historical resources. The regulations apply to all proposed development in the City when historical resources are present on the premises regardless of the requirement to obtain a Neighborhood Development Permit or Site Development Permit. When any portion of a premises contains historical resources, as defined in SDMC Chapter 11, Article 3, Division 1, the regulations apply to the entire premises.

2.6.3.3 Historical Resource Technical Report Guidelines and Requirements

The City's Historical Resource Technical Report Guidelines and Requirements is the guiding document for the management of historical resources in the City. The intent of the guidelines is to ensure consistency in the management of the City's historical resources, including identification, evaluation, preservation/mitigation, and development. In addition, the guidelines also provide an overview of the development review process and requirements for the preparation of cultural resources technical studies.

2.6.3.4 CEQA Significance Determination Thresholds for Historical Resources

Historical resources significance determination, pursuant to the City's CEQA Significance Determination Thresholds, consists of determining the sensitivity or significance of identified historical resources and then determining direct and indirect impacts that would result from project implementation. The City's CEQA Significance Determination Thresholds define a significant historical resource as one that qualifies for the CRHR or is listed in a local historic register or deemed significant in a historical resource survey, as provided under California Public Resources Code, Section 5024.1(g), although even a resource that is not listed in or determined eligible for listing in the CRHR, not included in a local register, or not deemed significant in a historical resource survey may nonetheless be historically significant for the purposes of CEQA. The SDMC Historical Resources Guidelines state that the significance of a resource may be determined based on the potential for the resource to address important research questions as documented in a site-specific technical report prepared as part of the environmental review process.

Based on the City's CEQA Significance Determination Thresholds, a significant impact regarding historical resources could occur if implementation of a project would result in a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5, including the adverse physical or aesthetic effects or the destruction of a prehistoric or historic building (including an architecturally significant building), structure, or object or site.

As a baseline, the City has established the following criteria to be used in the determination of significance for an archaeological resource under CEQA:

> An archaeological site must consist of at least three associated artifacts/ecofacts (within a 40 square meter area) or a single feature and must be at least 45 years of age. Archaeological sites containing only a surface component are generally considered not significant, unless demonstrated otherwise. Such site types may include isolated finds, bedrock milling stations, sparse lithic scatters, and shellfish processing stations. All other archaeological sites are considered potentially significant. The determination of significance is based on a number of factors specific to a particular site including site size, type, and integrity; presence or absence of a subsurface deposit, soil stratigraphy, features, diagnostics, and datable

material; artifact and ecofact density; assemblage complexity; cultural affiliation; association with an important person or event; and ethnic importance.

The determination of significance for historic buildings, structures, objects and landscapes is based on age, location, context, association with an important person or event, uniqueness, and integrity.

A site will be considered to possess ethnic significance if it is associated with a burial or cemetery; religious, social or traditional activities of a discrete ethnic population; an important person or event as defined by a discrete ethnic population; or the mythology of a discrete ethnic population.

Based on the City's CEQA Significance Determination Thresholds (City of San Diego 2022), a significant impact regarding archaeological resources could occur if implementation of a project would result in a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 or the disturbance of any human remains, including those interred outside formal cemeteries.

2.6.4 Native American Traditional Cultural Properties

2.6.4.1 Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act of 1990 (NAGPRA), provides a process for federal agencies and institutions that receive federal funds (including museums, universities, state agencies, and local governments) to repatriate or transfer from their collections certain Native American cultural items—human remains, funerary objects, sacred objects, and objects of cultural patrimony—to lineal descendants, Native American Tribes, Alaska Native corporations, and Native Hawaiian organizations. NAGPRA also provides a process for federal agencies to address new discoveries of Native American human remains, funerary objects, sacred objects, and objects of cultural property intentionally excavated or inadvertently discovered on federal or Tribal lands. Those processes are detailed in Code of Federal Regulations, Title, Section 10.4. "New" discoveries are those events occurring after November 16, 1990, when NAGPRA was enacted. Consultation with Native American Tribes, Alaska Native corporations, and Native Hawaiian organizations is a critical component for addressing identification, treatment, and disposition of Native American cultural items.

2.6.4.2 Native American Heritage Values

Federal and state laws mandate that consideration be given to the concerns of contemporary Native Americans with regard to potentially ancestral human remains, associated funerary objects, and items of cultural patrimony. Consequently, an important element in assessing the

significance of the study site has been to evaluate the likelihood that these classes of items are present in areas that would be affected by the project.

Also, potentially relevant to prehistoric archaeological sites is the category termed "Traditional Cultural Properties" in discussions of cultural resources management performed under federal auspices. According to Parker and King (1998), "traditional" in this context refers to those beliefs, customs, and practices of a living community of people that have been passed down through the generations, usually orally or through practice. The traditional cultural significance of a historic property, then, is significance derived from the role the property plays in a community's historically rooted beliefs, customs, and practices. Examples of properties possessing such significance include the following:

1. A location associated with the traditional beliefs of a Native American group about its origins, its cultural history, or the nature of the world;
2. A rural community whose organization, buildings and structures, or patterns of land use reflect the cultural traditions valued by its long-term residents;
3. An urban neighborhood that is the traditional home of a particular cultural group, and that reflects its beliefs and practices;
4. A location where Native American religious practitioners have historically gone, and are known or thought to go today, to perform ceremonial activities in accordance with traditional cultural rules of practice; and
5. A location where a community has traditionally carried out economic, artistic, or other cultural practices important in maintaining its historic identity.

Thus, a Traditional Cultural Property can be defined generally as one that is eligible for inclusion in the NRHP because of its association with cultural practices or beliefs of a living community that (1) are rooted in that community's history and (2) are important in maintaining the continuing cultural identity of the community.

2.6.4.3 California Native American Graves Protection and Repatriation Act

In 2001, the California Legislature passed Assembly Bill (AB) 978, the California NAGPRA of 2001, requiring all state agencies and museums that receive state funding and that have possession or control over collections of human remains or cultural items to provide a process for the identification and repatriation of these items to the appropriate Tribes. The bill also created a Repatriation Oversight Commission with oversight authority. The intent of the legislation was to cover gaps in the federal NAGPRA specific to the State of California. After the Repatriation Oversight Commission remained unfunded for over a decade, the NAHC was granted oversight authority. The NAHC was given more responsibilities in 2018 under AB 2836 and in 2021 under AB 275. AB 2836 requires the NAHC to provide technical assistance to the University of California in implementing policies and procedures adopted to expedite repatriation of remaining

items in its possession. AB 275 requires the NAHC to maintain a list of California Native American Tribes and their state aboriginal territories, adopt mediation procedures, and publish notices of completion of preliminary inventories and summaries on the NAHC website. Pursuant to Section 8013(a) of the California Health and Safety Code, the NAHC maintains a list of all California Native American Tribes and their respective state aboriginal territories for the purpose of the repatriation of Native American human remains and cultural items.

2.6.4.4 Native American Historic Resource Protection Act

California Public Resources Code, Sections 5097 et seq., codify the procedures to be followed in the event of the unexpected discovery of human remains on nonfederal public lands. Section 5097.9 states that no public agency or private party on public property shall "interfere with the free expression or exercise of Native American Religion." The code further states that:

> No such agency or party [shall] cause severe or irreparable damage to any Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine . . . except on a clear and convincing showing that the public interest and necessity so require. County and city lands are exempt from this provision, expect for parklands larger than 100 acres.

2.6.4.5 City of San Diego CEQA Significance Determination Thresholds for Tribal Cultural Resources

CEQA was amended in 2014 through AB 52, which created a new category of "Tribal Cultural Resources" that must be considered under CEQA and applies to all projects that file a Notice of Preparation or Notice of Intent to Adopt a Negative Declaration or Mitigated Negative Declaration on or after July 1, 2015. AB 52 requires lead agencies to provide notice to and begin consultation with California Native American Tribes that are traditionally and culturally affiliated with the geographic area of a project if that Tribe has requested, in writing, to be kept informed of projects by the lead agency prior to the determination of if a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report will be prepared. If a Tribe requests consultation within 30 days upon receipt of the notice, the lead agency must consult with the Tribe. AB 52 also specifies mitigation measures that may be considered to avoid or minimize impacts on Tribal Cultural Resources. Specifically, California Public Resources Code, Section 21074, provides the following guidance:

(a) "Tribal Cultural Resources" are either of the following:
    1. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are either of the following:
        A. Included or determined to be eligible for inclusion in the California Register of Historical Resources.
        B. Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American Tribe.

(b) A cultural landscape that meets the criteria of subdivision (a) is a Tribal Cultural Resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

(c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "nonunique archaeological resource" as defined in subdivision (h) of Section 21083.2 may also be a Tribal Cultural Resource if it conforms with the criteria of subdivision (a).

Section 3 Methods

3.1 Survey Methods

The goal of this cultural survey was to identify known resources, provide an analysis of those resources, and recommend measures to reduce impacts to a less than significant level. The pedestrian survey was conducted on March 20, 2024, by Rocky Ciarmoli and Jasmine Alvarez-Ceja from Harris and Lawerence Douglas, who served as the Kumeyaay Native American monitor. Record searches were conducted for the APE (the project site and a 1-mile buffer). The area included in the field survey (survey area) included the project site and a 100-foot buffer. In addition, the NAHC was contacted for a Sacred Lands File check, and Tribal outreach was conducted (Confidential Appendix E, Sacred Lands File Check and Tribal Outreach).

The intensive pedestrian survey was conducted using standard archaeological procedures and techniques to identify any historical sites, structures, features, or objects. Continuous parallel transects (5 meters) were walked primarily in a south–north direction in the accessible northern portion of the project site and a north–south direction in the southern portion of the project site. Transects were modified when heavy vegetation was encountered. For the most part, the project site is heavily eroded and developed, and visibility was limited. Areas including eroded runoff gorges, disturbed steep slopes, drainages, and cleared areas were opportunistically surveyed for the presence of resources. The accessible northern portion of the parcel surveyed is heavily vegetated with native shrubbery, trees, and grasses, as well as poison oak. Multiple dirt access/fire roads appear to be well maintained. The drainage also contains non-native vegetation. The survey area was photographed (Appendix C) to document the environmental setting.

3.2 Historical Maps and Aerials

Thirty-four historic aerial maps from 1953 to 2020 were reviewed for the project. In 1953, the project site was vacant, and the surrounding area was minimally developed. Voight Drive (formerly Mira Mesa Boulevard) was present. By 1964, development was present west and south of the project site. By 1978, residential development was present to the east, and Genesee Avenue was west of the project site. By 1980, Campus Point Drive and associated adjacent commercial development were under construction. Development continued in the area in the 1980s, 1990s, and 2000s. However, the project site remained undeveloped.

3.3 Laboratory and Cataloging Procedures

No artifacts were identified; therefore, laboratory analysis was not required.

3.4 Artifact Conveyance

No artifacts were identified; therefore, conveyance is not required.

3.5 Native American Outreach and Participation

The NAHC was contacted for a Sacred Lands File check to determine if sacred lands are present on the project site. The NAHC response was negative for sacred lands and recommended that the list of Tribes provided be contacted. All Tribal bands were contacted by email and regular mail for any information they may have regarding sacred lands that may be present on the project site. To date, no responses have been received.

Redtail Environmental provided the Native American (Kumeyaay) monitor (Lawrence Douglas), who participated in the field survey conducted by Harris. Monitors are listed in Section 8, List of Preparers and Persons and Organizations Contacted. No concerns were raised by the Native American monitor.

Section 4 Report of Findings

The cultural survey was negative for the presence of resources. Below is a discussion of findings for the project.

4.1 Results

No known resources were identified as a result of the CHRIS background check, and no resources were identified during the pedestrian survey of the project.

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Section 5 Interpretation of Resource Importance and Impact Identification

5.1 Resource Importance

5.1.1 Archaeological Resources

No known archaeological resources were identified within the project APE as a result of the CHRIS background check, and no resources were identified during the cultural survey.

5.1.2 Historical Resources

No known historical resources were identified within the project APE as a result of the CHRIS background check, and no resources were identified during the cultural survey.

5.1.3 Native American Heritage Resources

The NAHC response was negative for the presence of sacred lands. All Tribal bands on the list provided by the NAHC were contacted, and to date, no responses have been received.

5.2 Impact Identification

No resources were identified during the CHRIS background check or during the field survey. As such, there are no impacts to known resources. However, due to the limited visibility (1–2 percent) and sensitivity of the area, there is potential for resources to be present (surface and subsurface).

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Section 6 Management Considerations – Avoidance and Minimization Measures and Design Considerations

Implementation of the project could result in direct impacts to unknown cultural resources; therefore, a Worker Environmental Awareness Program and an Archaeological and Tribal Monitoring Program are recommended.

6.1 Worker's Environmental Awareness Program

A qualified archaeologist should be retained to conduct Worker Environmental Awareness Program training on archaeological sensitivity for construction personnel prior to the start of any ground-disturbing activities. The archaeologist should meet or exceed the Secretary of the Interior's professional qualifications standards for archaeology (NPS 1983). Archaeological sensitivity training should include a description of the types of cultural material that may be encountered, cultural sensitivity issues, regulatory issues, and the proper protocol for treatment of the materials in the event of a find.

6.2 Archaeological and Tribal Monitoring Program

To reduce potential direct impacts to unknown resources, the following Archaeological and Tribal Monitoring Program should be implemented. The program should include but not be limited to the following requirements:

- Pre-construction
  - Contract with an archaeologist who meets or exceeds the Secretary of the Interior's professional qualifications standards for archaeology (NPS 1983). The archaeologist shall perform archaeological monitoring and a potential data recovery program during earth-disturbing activities. The project archaeologist shall perform the monitoring duties before, during, and after construction.
  - Project archaeologist and Kumeyaay Native American monitor to attend pre-construction meeting to explain the monitoring requirements.
- Construction
  - Monitoring. Both the project archaeologist and Kumeyaay Native American monitor are to be on site during earth-disturbing activities. The frequency and location of monitoring of native soils will be determined by the project archaeologist in consultation with the Kumeyaay Native American monitor.
  - If cultural resources are identified:
    - Both the project archaeologist and Kumeyaay Native American monitor have the authority to divert or temporarily halt ground disturbance operations in the area of the discovery.

- The project archaeologist shall contact the City at the time of discovery.
- The project archaeologist, in consultation with the City and consulting Tribe, shall determine the significance of discovered resources.
- Construction activities shall be allowed to resume after the City and consulting Tribe concur with the significance evaluation.
- Isolates and non-significant deposits shall be minimally documented in the field. Should the isolates and non-significant deposits not be collected by the project archaeologist, the Kumeyaay Native American monitor may collect the cultural material for transfer to a Tribal curation facility or repatriation program.
- If cultural resources are determined to be significant, a Research Design and Data Recovery Program shall be prepared by the Project Archaeologist in consultation with the Kumeyaay Native American monitor and approved by the City. The program shall include reasonable efforts to preserve (avoid) unique cultural resources of Sacred Sites; the capping of identified Sacred Sites or unique cultural resources and placement of development over the cap if avoidance is infeasible; and data recovery for non-unique cultural resources. The preferred option is preservation (avoidance).

– Human remains
  - The property owner or their representative shall contact the County Coroner and the City.
  - Upon identification of human remains, no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin. If the human remains are to be taken off site for evaluation, they shall be accompanied by the Kumeyaay Native American monitor.
  - If the remains are determined to be of Native American origin, the MLD, as identified by the NAHC, shall be contacted by the property owner or their representative to determine proper treatment and disposition of the remains.
  - The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by California Public Resources Code, Section 5097.98, has been conducted.
  - California Public Resources Code, Section 5097.98; CEQA Guidelines, Section 15064.5; and California Health and Safety Code, Section 7050.5, shall be followed in the event that human remains are discovered.

- Rough grading
  - Monitoring Report. Upon completion of rough grading, a monitoring report shall be prepared identifying if resources were encountered. A copy of the monitoring report shall be provided to the South Coastal Information Center and any culturally affiliated Tribe who requests a copy.
- Final grading
  - Final Report. A final report shall be prepared substantiating that earth-disturbing activities are completed and if cultural resources were encountered. A copy of the final report shall be submitted to the South Coastal Information Center and any culturally affiliated Tribe who requests a copy.
  - Cultural material conveyance
    - The final report shall include evidence that all prehistoric materials have been curated at a San Diego curation facility or Tribal curation facility that meets federal standards per Code of Federal Regulations, Title 36, Part 79, or alternatively have been repatriated to a culturally affiliated Tribe.
    - The final report shall include evidence that all historic materials have been curated at a San Diego curation facility that meets federal standards per Code of Federal Regulations, Title 36, Part 79.

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Section 8 List of Preparers and Persons and Organizations Contacted

The following persons participated in the preparation of this CRTR:

Harris & Associates

Donna Beddow	Principal Investigator
Ryan Binns	Senior Director, Environmental + Planning Consulting
Rocky Ciarmoli	Archaeologist
Jasmine Alvarez-Ceja	Archaeologist
William Garcia	Project Manager
Jason Caprio	Director, Water Market – Southern California

City of San Diego

Daniel Yelsits	Project Manager
Scott Vurbeff	Senior Planner

Redtail Environmental

Clint Linton	Owner/Kumeyaay Native American Monitor
Lawrence Douglas	Kumeyaay Native American Monitor

The following agencies and individuals were contacted:

Art Bunce	Barona Group of the Capitan Grande
Ralph Goff	Campo Band of Diegueño Mission Indians
Michael Garcia	Ewiiaapaayp Band of Kumeyaay Indians
Robert Pinto	Ewiiaapaayp Band of Kumeyaay Indians
Clint Linton	Iipay Nation of Santa Ysabel
Rebecca Osuna	Inaja-Cosmit Band of Indians
Erica Pinto	Jamul Indian Village
Lisa Cumper	Jamul Indian Village
Carmen Lucas	Kwaaymii Laguna Band of Mission Indians
Gwendolyn Parada	La Posta Band of Diegueño Mission Indians
Angela Elliott Santos	Manzanita Band of Kumeyaay Nation
Theresa Hernandez	Mesa Grande Band of Diegueño Mission Indians
Stephen Cope	San Pasqual Band of Mission Indians
John Flores	San Pasqual Band of Mission Indians
Cody Martinez	Sycuan Band of the Kumeyaay Nation
Bernice Paipa	Sycuan Band of the Kumeyaay Nation

Ernest Pingleton	Viejas Band of Kumeyaay Indians
Ray Teran	Viejas Band of Kumeyaay Indians

Appendix A. Resumes

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Donna Beddow, RPA

SENIOR ARCHAEOLOGIST

Donna Beddow is a Senior Archaeologist with over 20 years of practical experience managing or part of multi-disciplinary teams. She specializes in cultural and tribal cultural resources, and has extensive experience with Native American consultation including AB-52, SB-18, and Sacred Lands. The majority of her career has been for the County of San Diego as a Senior Staff Archaeologist and Environmental Coordinator. She served as the County of San Diego Historic Site Board liaison and managed the County's cultural program. Her Master's thesis was used as the model for the development of the County's Significance Guidelines for Cultural Resources. These guidelines have been used by other lead agencies and environmental organizations, and are still used by the County of San Diego.

Her 20 plus years of experience include the review and preparation of CEQA documents. She has managed highly complex projects involving sensitive or difficult environmental issues; resolved major project issues and public controversies though applicant engagement and coordination with the general public and tribes. Ms. Beddow has reviewed and prepared cultural resource studies and CEQA documents for both private and public development projects.

EDUCATION

MA, Anthropology, San Diego State University, 2004

BA, History, San Diego State University, 1997

QUALIFICATIONS

Register of Professional Archaeologists

Meets Secretary of Interior's Professional Qualifications in Archaeology and History

RELEVANT EXPERIENCE

- **City of San Marcos,** *CEQA On-Call Consultant Services* (*Woodward 46 Specific Plan, Pico Avenue),* October 2023 to Present. Harris assisted the City of San Marcos with the review of environmental documents and technical studies. In addition, Harris has provided survey and report preparation for various projects. Responsibilities include peer reviewing and revising the cultural and tribal cultural sections of draft environmental documents and cultural studies for adequacy under CEQA and other applicable federal, state, and local requirements, and for consistency and compliance with project plans. In addition, as Principal Investigator, responsibilities include conducting background searches that relied on the CHRIS system, sacred lands file checks and tribal outreach, inventories, historic maps, and historic registers including the National and California Registers. Furthermore, a site survey to identify previously recorded and new sites was conducted, coordination with Native American monitors, and preparation of cultural resources technical reports.
- **University of California at San Diego (UCSD)**, *Rancho Bernardo Healthcare Center Medical Office Building*, September 2023 to Present. Harris assisted UCSD with the preparation of a Mitigated Negative Declaration (MND) for the development of a healthcare campus on a 9.81-acre site. As Principal Investigator, responsibilities consisted of a desk top evaluation of the project which included conducting a background search that relied on the CHRIS system, review of historic maps, and historic registers including the National, California, and local registers, a sacred lands file check and tribal outreach, and preparation of the cultural and tribal cultural resources section of the MND. Harris also assisted UCSD with the preparation of AB 52 tribal outreach letters and assisted with consultation tasks such as coordinating meetings and responding to tribes.
- **County of Santa Cruz,** *Buena Vista Drive Repairs,* August 2023 to Present**.** Harris assisted the County of Santa Cruz with the cultural evaluation for improvements to Buena Vista Drive. Responsibilities include conducting a background search that relied on the CHRIS system, sacred lands file check and tribal outreach, inventories, historic maps, and historic registers including the National and California Registers. In addition, a site survey to identify previously recorded and new sites was conducted, and preparation of a cultural resources technical report was prepared.

- **City of Gilroy,** *StorQuest,* July 2023 to Present**.** Harris assisted the City of Gilroy with the cultural evaluation for the development of a self-storage facility. Responsibilities include conducting a background search that relied on the CHRIS system, sacred lands file check and tribal outreach, inventories, historic maps, and historic registers including the National and California Registers. In addition, a site survey to identify previously recorded and new sites was conducted, and preparation of a cultural resources technical report was prepared.
- **City of Napa,** *The Grange Campground,* March 2023 to Present**.** Harris assisted the City of Napa with the cultural evaluation for the development of a campground complex. Responsibilities include conducting a background search that relied on the CHRIS system, sacred lands file check and tribal outreach, inventories, historic maps, and historic registers including the National and California Registers. In addition, a site survey to identify previously recorded and new sites was conducted, and preparation of a cultural resources technical report was prepared.
- **City of San Diego,** *Coastal Resiliency Master Plan & PEIR,* February 2023 to Present. Harris is assisting the City in the development of the Coastal Resilience Master Plan and PEIR to implement Climate Resilient San Diego. The team evaluated nine locations for nature-based solutions and narrowed the scope down to the six most suitable locations. As Principal Investigator, responsibilities include conducting a background search that relies on the CHRIS system, sacred lands file check and tribal outreach, inventories, historic maps, and historic registers including the National, California, and City of San Diego Registers. In addition, site surveys to identify previously recorded and new sites, and preparation of a cultural resources technical report was prepared. The Plan and PEIR will implement Climate Resilient San Diego to inform development of nature-based coastal resilience projects to build resilience to the impacts of sea level rise and enhance and protect the biological diversity of the City's coastline.
- **City of Pacific Grove,** *Capital Improvement Project for Wastewater Collection System Phase 9,* October 2022 to Present**.** Harris assisted the City of Pacific Grove with the cultural evaluation for improvements to the wastewater collection system. Responsibilities included conducting a background search that relied on the CHRIS system, sacred lands file check and tribal outreach, inventories, historic maps, and historic registers including the National and California Registers. In addition, a site survey to identify previously recorded and new sites was conducted, and preparation of a cultural resources technical report was prepared.
- **Port of San Diego,** *Sweetwater Park,* July 2022 to Present. Harris assisted the Port of San Diego with a Section 106 consultation for grant funding to assist with the development of Sweetwater Park. In addition, Harris also provided monitoring services during construction. As Principal Investigator, responsibilities included conducting a background search that relied on the CHRIS system, sacred lands files, inventories, historic maps, and historic registers. In addition, tribal outreach, a site survey to identify previously recorded and new sites, and preparation of a cultural resources technical report and Section 106 documents (Area of Potential Effect, Findings of No Effect) were completed. The evaluation relied in part on the Chula Vista Bayfront Master Plan Final EIR (2010). Furthermore, archaeological and tribal monitoring was provided during construction that included data recovery for identified resources.
- **CH Realty,** Perris Valley Industrial Project – City of Perris*,* March 2022 to Present**.** Harris conducted the cultural evaluation for the development of an industrial building. Responsibilities include conducting a background search that relied on the CHRIS system, sacred lands file check and tribal outreach, inventories, historic maps, and historic registers including the National and California Registers. In addition, a site survey to identify previously recorded and new sites was conducted, and preparation of a cultural resources technical report was prepared.
- **County of San Diego,** *HUD Cultural Evaluations,* February 2022 to Present. Harris assisted the County of San Diego with the cultural evaluation of development sites that are applying for federal funding. Development sites include individual mobile homes, park acquisition sites, sidewalk and ADA access improvements, and vacant land. As Principal Investigator, responsibilities included conducting a background search that relies on the CHRIS system, historic maps, and historic registers including the National, California, and County of San Diego Registers. In addition, cultural surveys were conducted and preparation of required documentation for Section 106 consultation.
- **City of Watsonville,** *Climate Action and Adaptation Plan,* September - December 2021. Harris assisted the City of Watsonville with the preparation of the Climate Action and Adaptation Plan including a Negative Declaration. As part of the project, tribal consultation pursuant to SB 18 was required. Harris prepared the SB 18 tribal outreach letters, and assisted with consultation tasks such as coordinating meetings and responding to tribes.

- **County of San Diego,** *Live Oak Springs Water System Improvements Project,* April 2021 to May 2024. Harris assisted the County with the biological and cultural evaluations for improvements to the potable water system on approximately 74 acres in the community of Live Oak Springs. In addition, Harris provided archaeological and tribal monitoring during project construction. As Principal Investigator, responsibilities included conducting a background search that relied on the CHRIS system, sacred lands files, inventories, and historic maps. In addition, tribal outreach, a site survey to identify previously recorded and new sites, preparation of a cultural resources technical report, and coordination with the Native American monitor was completed. Furthermore, archaeological and tribal monitors were provided during construction and data recovery was conducted for identified resources.
- **City of Victorville,** ***General Plan Update,*** March 2021 – January 2022. Harris assisted the City of Victorville with the preparation of the General Plan Update which included updates to the Housing and Land Use Elements, as well as the Programmatic EIR. Harris assisted the City with the preparation of AB 52 and SB 18 tribal outreach letters and assisted with consultation tasks such as coordinating meetings and responding to tribes.
- **County of San Diego Planning & Development Services,** *Project Staff Support Services,* March 2021 to Present**.** Harris' support services cover technical expertise of CEQA resource areas including, but not limited to, CEQA documentation, biological resources, cultural resources, and noise. Services include reviewing EIRs, MNDs, NDs, 15183 checklists, addendums, categorical exemptions, and other CEQA documentation. The Harris team also conducts research and prepares reports and environmental documentation, project mitigation measures, conditions of approval, and project alternatives. As Principal Investigator, responsibilities consist of providing support services for the cultural resources subject area. Duties include cultural resource evaluations, review and preparation of cultural reports, conducting cultural surveys, and engaging in tribal consultations (Sacred Lands, AB-52, and SB-18). In addition, consulting with tribes post-project approval has been conducted to determine appropriate mitigations when projects are not in compliance with permit requirements.
- **County of San Diego Department of Public Works,** *Environmental Staff Support Services,* March 2021 to Present**.** Harris assisted the County of San Diego with cultural evaluations for public projects. Responsibilities include conducting a background search that relied on the CHRIS system, sacred lands file check and tribal outreach, inventories, historic maps, and historic registers including the National and California Registers. In addition, a site survey to identify previously recorded and new sites was conducted, and preparation of a cultural resources technical report was prepared.
- **City of San Diego,** *Grove Avenue Emergency Wall Repair.* Principal Investigator. Harris assisted the Port of San Diego with a Section 106 consultation for grant funding to assist with the development of Sweetwater Park. Responsibilities included conducting a background search that relied on the CHRIS system, sacred lands files, inventories, and historic maps. In addition, tribal outreach, a site survey to identify previously recorded and new sites, and preparation of a cultural resources technical report and Section 106 documents (Area of Potential Effect, Findings of No Effect) were completed.
- **City of Escondido,** *Program EIR for Sixth Cycle Housing Element and Land Use/Zoning***.** Harris assisted the City of Escondido with the preparation of the Program EIR for the Sixth Cycle Housing Element. As Principal Investigator, responsibilities included the management of the cultural and tribal cultural resources requirements for the project. Duties included the preparation of the cultural and tribal cultural resources sections of the EIR which required the identification of impacts and appropriate mitigations. In addition, tribal outreach letters pursuant to AB 52 and SB 18 were prepared for the City, and Harris coordinated with the City on deliverables.

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Appendix B. Figures

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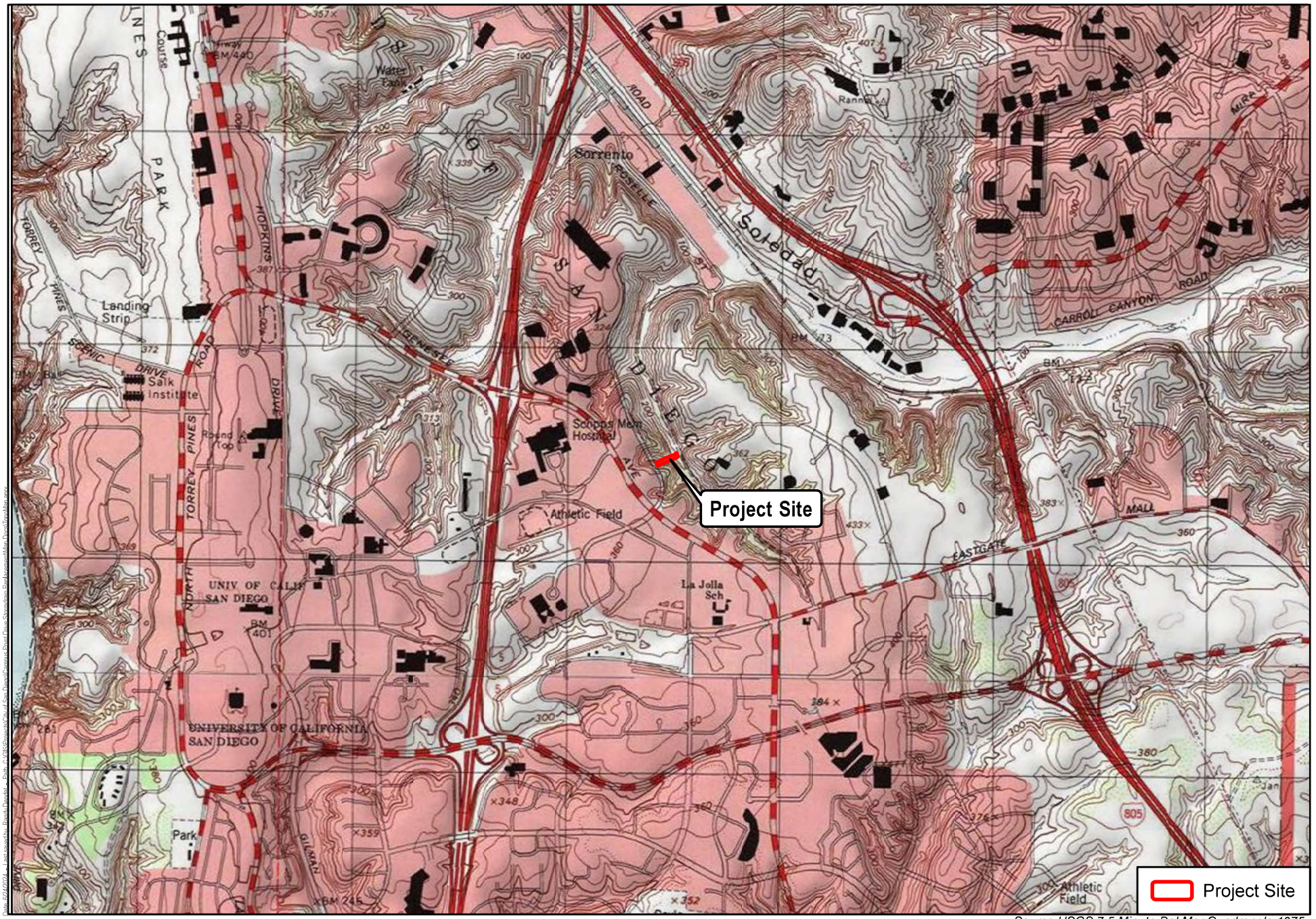

Source:USGS 7.5 Minute Del Mar Quadrangle 1975.

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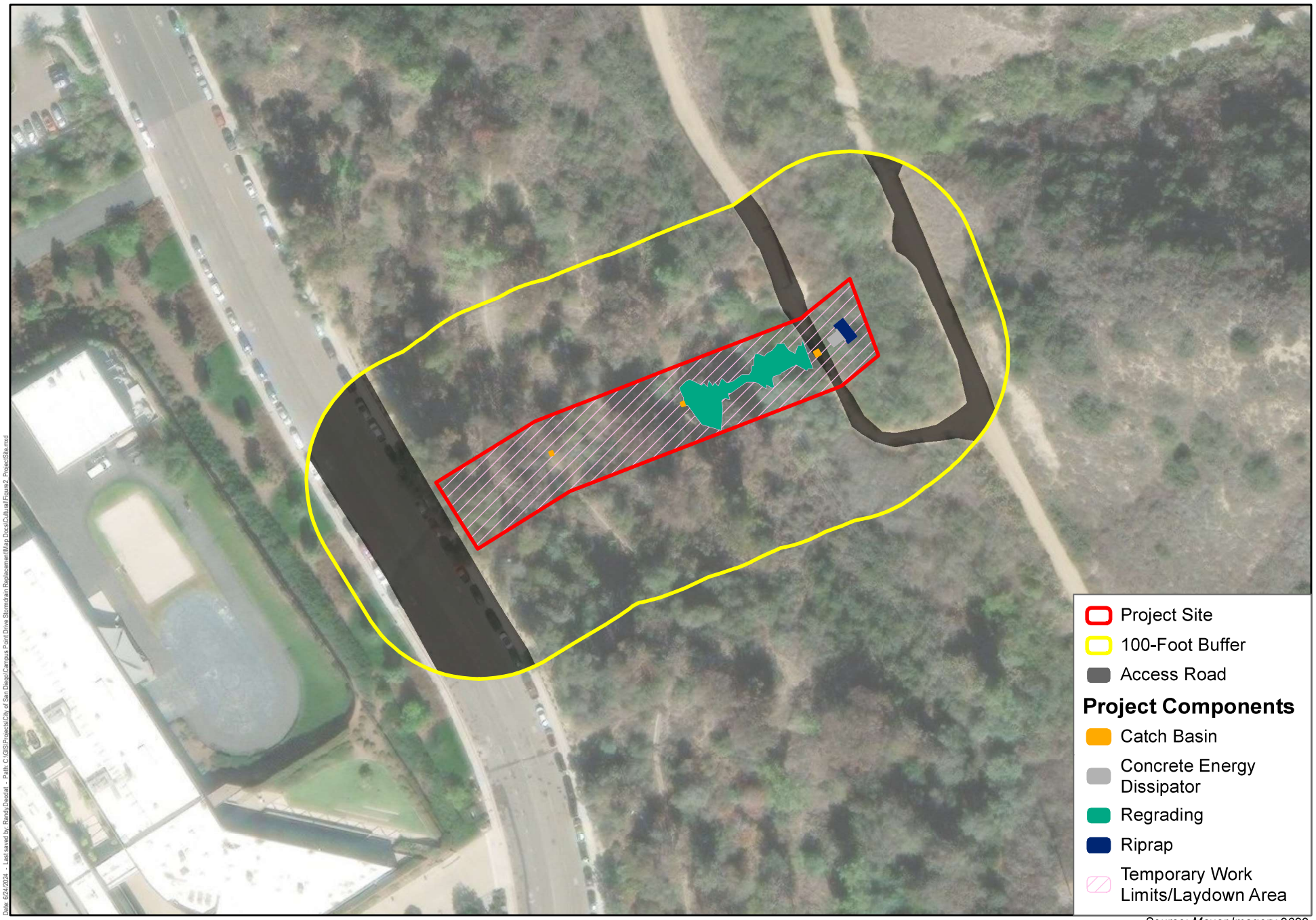
Figure 1

USGS Topographic Map

Campus Point Drive Storm Drain Replacement Project



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Source: Maxar Imagery 2022.

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Feet

Figure 2

Project Location

Campus Point Drive Storm Drain Replacement Project

Appendix C. Photographs

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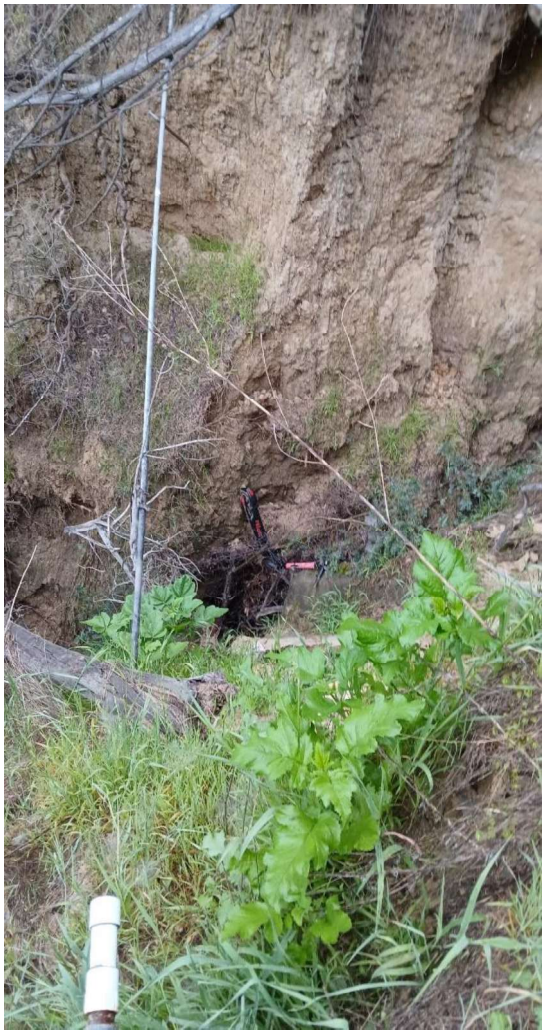
Photograph 1: Southeastern corner of survey area.

Photograph 2: Southern boundary of survey area.

Photograph 3: Drainage – eastern side of survey area.



Photograph 4: Northern side of survey area.

Photograph 5: Drainage – eastern side of survey area.

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Confidential Appendix D. CHRIS Background Data

Under Separate Cover – Refer to Confidential Appendices

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Confidential Appendix E. Sacred Lands File Check and Tribal Outreach

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