

Bradley Court Convalescent Center Expansion Project

Cultural Resources Technical Report

PDS2021-MUP-85-053W²

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Glossary of Terms

APN	Assessor's Parcel Number
ARMR	Archaeological Resources Management Report
ASML	Above Mean Sea Level
BCE	Before Common Era
CE	Common Era
CEQA	California Environmental Quality Act
CHRIS	California Historical Resources Information System
County	County of San Diego
CRHR	California Register of Historical Resources
Kgr	granitoid rocks
MLD	Most Likely Descendant
NAHC	Native American Heritage Commission
NRHP	National Register of Historic Places
Ordinance	Resource Protection Ordinance
PfC	Placentia Series sandy loam
Project	Bradley Court Convalescent Center Expansion Project
Qu	Undivided alluvium and colluvium
RA	Registered Archaeologist
Rincon	Rincon Consultants, Inc.
RPA	Registered Professional Archaeologist
SCIC	South Central Information Center
USGS	United States Geological Survey
VsE	Vista Series coarse sandy loam
XPI	Extended Phase I Testing Plan

Executive Summary

Rincon Consultants Inc. (Rincon) was retained by ARCO Construction Company, Inc. to conduct an Cultural Resources Assessment for the Bradley Court Convalescent Center Expansion Project (project) in El Cajon, San Diego County, California. This assessment addresses the requirements of the California Environmental Quality Act (CEQA) and includes a cultural resources records search, a Sacred Lands File search, pedestrian survey, and the preparation of this technical report. This report conforms to the Archaeological Resources Management Report (ARMR) guidelines set by the California Office of Historic Preservation and the County of San Diego (County) reporting requirements. The County is the lead agency under CEQA. This assessment reports on archaeological resources only, no built environmental assessment was conducted for this project.

The Sacred Lands File search from the Native American Heritage Commission was returned with positive results for the project site and vicinity. The records search for the project identified 21 previously conducted cultural resources studies within a 0.5-mile radius of the project site, of which one included the entire project site. Additionally, the records search identified 16 previously recorded cultural resources within a 0.5-mile radius of the project site, none of which occur within the project site; however, one prehistoric resource is recorded within approximately 0.2-mile of the project site, and an undocumented prehistoric milling complex immediately southwest of the project site. Additionally, previous cultural resources studies within the vicinity recommend archaeological and Native American monitoring due to the presence of previously recorded resources and general sensitivity of the area.

The pedestrian survey did not identify any new cultural resources within the project site. Disturbances associated with construction of the existing buildings and paved parking lot were observed throughout the project site. Historical topographic map and aerial imagery review indicates that the project site was continuously developed from 1941 to 2000 (NETR Online 2021; USGS 2021). Furthermore, aerial imagery and topographic maps depict the San Diego River approximately 2.6 miles north of the project site, and Forester Creek approximately 1.4 miles west of the project site, further providing evidence for the sensitivity of the vicinity of the project site as water sources provide a natural sustenance resource.

Based on this information, the project site is considered to have a moderate sensitivity for archaeological resources. Rincon recommends the following mitigation measures: a worker's environmental awareness program should be conducted prior to earthmoving activities, archaeological monitoring during ground disturbing activities by a qualified archaeologist, and provisions for unanticipated discoveries of cultural resources during project implementation. With adherence to these measures, Rincon recommends a finding of less than significant impact to archaeological resources with mitigation under CEQA. Recommended measures are provided in further detail in Sections 4 and 7 of this assessment. The project is also required to adhere to State regulations regarding the unanticipated discovery of human remains.

1 Introduction

Rincon Consultants Inc. (Rincon) was retained by ARCO Construction Company, Inc. to conduct an Archaeological Resources Assessment for the Bradley Court Convalescent Center Expansion Project (project) in El Cajon, San Diego County, California. This assessment addresses the requirements of the California Environmental Quality Act (CEQA) and includes a cultural resources records search, a Sacred Lands File search, a pedestrian survey, and the preparation of this technical report. This report conforms to the Archaeological Resources Management Report (ARMR) guidelines set by the California Office of Historic Preservation and the County of San Diego (County) report requirements. The County is the lead agency under CEQA. This assessment reports on archaeological resources only, no built environmental assessment was conducted for this project.

1.1 Project Location and Description

The project site consists of 3.4-acres of Assessor's Parcel Number (APN) 3871-426-600 located at 675 East Bradley Avenue, El Cajon, San Diego County, California. The project lies within the *El Cajon South, California* topographic quadrangle, Township 1 South, Range 1 West, Section 35. The project site is bound by E. Bradley Avenue to the north, Sams Hill Road to the west, residential development to the south-southwest and east, and commercial development to the northeast (Figure 1 and Figure 2). Soils within the project site consist of coarse sandy loam; the project site is also located within an alluvial fan. The project site is currently developed with two Modern California Ranch buildings including a special care building and a residential building both constructed in 1960 (*San Diego Union*, October 2, 1960).

The project would construct a new 26,515 square-foot adult residential facility building with 66 resident beds and a new 10,613 sf 31-bed skilled nursing building. The existing residential building would be converted to a controlled access building. The total project site would include four buildings with a total of 153 beds. The proposed sitework will include 73 parking spaces, and a new fire lane access road allowing access to the rear of existing Building 2 and the new Building 3. A new driveway approach along Bradley Avenue will be placed for full fire truck access. New sewer, domestic water, and fire water (including one additional fire hydrant) will be provided with the sitework. Two trash enclosures for refuse and recycled goods will be provided. Along with new landscaping throughout the facility, site lighting will be installed to provide a minimum of 1.0 FC of lighting along all egress paths to the public way.

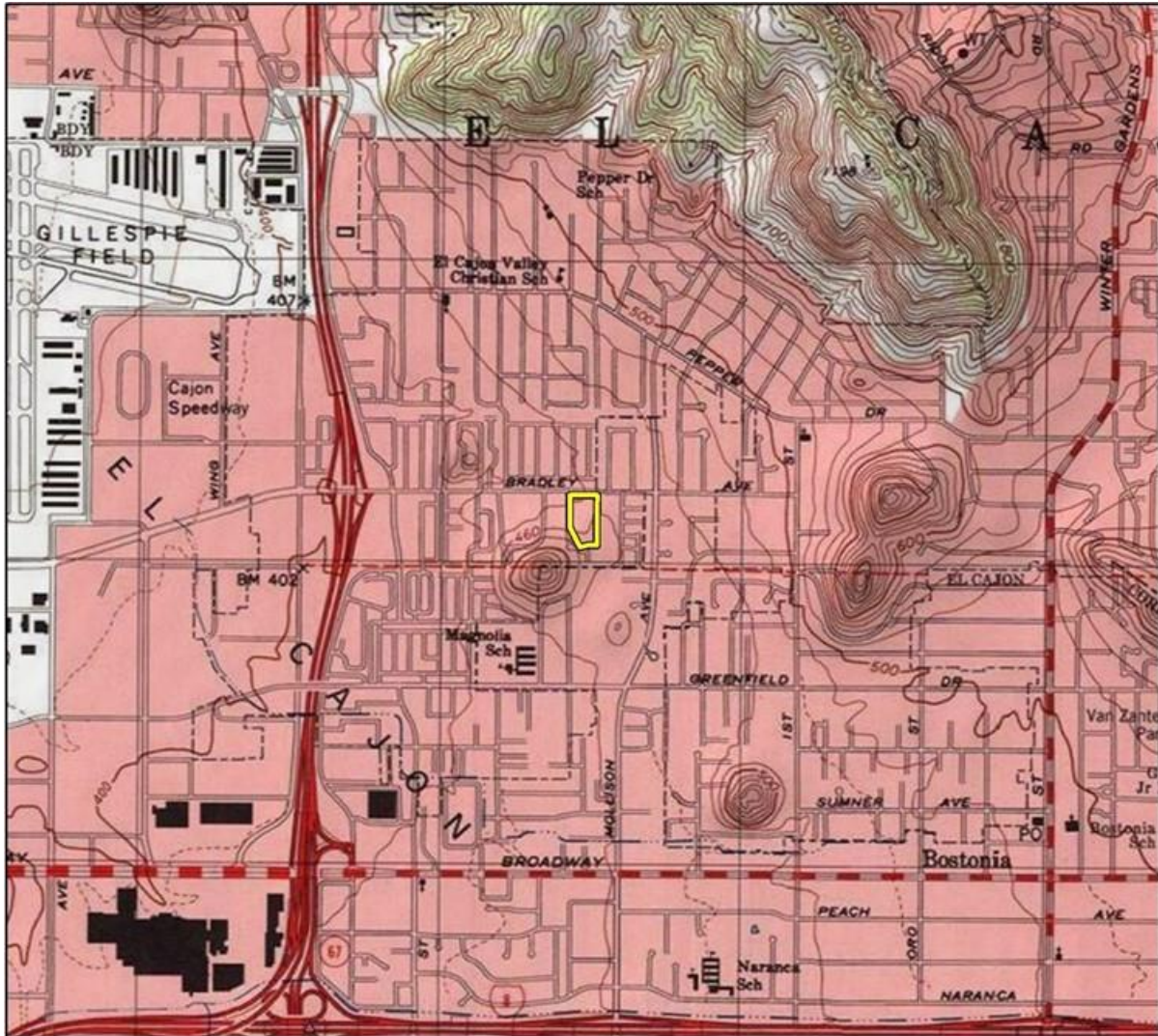
1.2 Existing Conditions

1.2.1 Environmental Setting

The project site is located within the peninsular ranges of northern El Cajon, in an urban setting with two existing buildings. The project site is situated at an elevation of 140 meters (460 feet [ft]) above mean sea level (AMSL). Vegetation mainly consists ornamental trees and shrubs. The soils within the project site consist of the Placentia Series sandy loam and Vista Series coarse sandy loam dating to the Holocene and Pleistocene (USDA 2020; USGS 2004). Placentia Series soils are typically found

within toe-slopes and depressions; while Vista Series soils are found along hillsides, backslopes, and rock outcrops, all of which are found within and surrounding the current project site.

Figure 1 Project Vicinity Map



Basemap provided by National Geographic Society, Esri and its licensors © 2021. El Cajon South Quadrangle. T15S R01W S35. The topographic representation depicted in this map may not portray all of the features currently found in the vicinity today and/or features depicted in this map may have changed since the original topographic map was assembled.

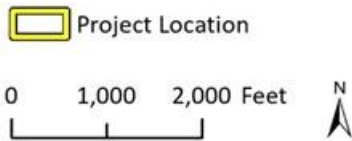


Figure 2 Project Location Map



Imagery provided by Microsoft Bing and its licensors © 2021.

1.2.1.1 Natural Setting

Approximately 80 percent of soils within the project site are Placentia Series sandy loam (Pfc), which generally lay on alluvial fans and terraces and consist of alluvium derived from coarse-grained igneous rocks. A typical profile of Placentia Series soils features sandy loam from 0 to 13 inches, sandy clay from 13 to 34 inches, and sandy clay loam from 34 to 63 inches with minimal inclusions and moderate drainage (USDA 2020). These types of soils are typically found on toe-slopes and depressions. The southern portion of the project site is made up of Vista Series coarse sandy loam (VsE) with some inclusions and 15 to 30 percent slopes. These well drained soils are typically found on hills, backslopes, and around rock outcrops. According to United States Geological Survey (USGS) maps, the project site consist of undivided alluvium and colluvium (Qu) dating to the Holocene and Pleistocene with granitoid rocks (Kgr) from the early cretaceous (USGS 2004). Because of the episodic nature of alluvial sedimentation, the sudden burial of artifacts is possible, and alluvial soils have an increased likelihood of containing buried archaeological deposits (Waters 1992; Borejaza et al. 2014).

1.2.1.2 Cultural Setting

The cultural setting for the project is presented broadly in three overviews: Prehistoric, Ethnographic, and Historic. The prehistoric and historic overviews describe human occupation before and after European contact, while the ethnographic overview provides a synchronic “snapshot” of Native American culture.

Prehistoric Context

The project site lies in what is described generally as California’s Southern Bight (Byrd and Raab 2007). This region extends from the Mexican border to Santa Monica and includes Orange and San Diego counties, western Riverside County, and the Southern Channel Islands. At European contact, the Southern Bight was occupied by the Tongva, Juaneño, Luiseño, Cupeño, and Kumeyaay (Ipai and Tipai). For this study, the prehistoric cultural chronology for the Southern Bight is presented following Byrd and Raab (2007), who divided it into the Early (9600 - 5600 Before Common Era [BCE]), Middle (5600 - 1650 BCE), and Late (1650 BCE – 1769 Common Era [CE]) Holocene and focuses on the Kumeyaay people who inhabit the project area.

Early Holocene (ca. 9600 - 5600 BCE)

Evidence of Paleo-Indian occupation of southern California is very limited. The earliest accepted dates for human occupation of the California coast are from the Northern Channel Islands, off the Santa Barbara coast, and date to approximately 10,000 BCE (Johnson et al. 2002). San Diego and Orange counties and the Southern Channel Islands have not produced dates as early as these, but radiocarbon evidence has dated early occupation of the coastal region between circa (ca.) 8000 and 7000 BCE (Byrd and Raab 2007).

Traditional models describe California’s first inhabitants as big-game hunters roaming North America during the end of the last Ice Age. As the Ice Age ended, warmer and drier climatic conditions are thought to have created wide-spread cultural responses. The pluvial lakes and streams in the desert interior began to wane and cultures dependent on these water sources migrated to areas with moister conditions, such as the southern California coast (Byrd and Raab 2007).

The San Dieguito Complex is a well-defined cultural response to these changing climatic conditions in the southern California coastal region and was named originally for the cultural sequence in western San Diego County (Rogers 1929, 1939). Leaf-shaped points, knives, crescents, and scrapers characterize the artifact assemblages throughout the region (Byrd and Raab 2007). San Dieguito sites generally show evidence of the hunting of various animals, including birds, and gathering of plant resources (Moratto 1984).

Middle Holocene (ca. 5600 – 1650 BCE)

The Middle Holocene is viewed as a time of cultural transition. During this time, the cultural adaptations of the Early Holocene gradually altered. Use of milling stone tools began to appear across most of central and southern California around 6000 - 5000 BCE, indicating a focus on the collection and processing of hard-shelled seeds. Environmental changes in the Southern Bight are thought to have been the key factor in these changing adaptations (Byrd and Raab 2007). Occupation patterns indicated semi-sedentary populations focused on the bays and estuaries of San Diego and Orange counties, with shellfish and plant resources as the most important dietary components (Warren 1968). In the San Diego area, this adaptive strategy is known as the La Jolla complex.

Sometime around 4000 years ago, extensive estuarine silting began to cause a decline in shellfish and thus a depopulation of the coastal zone. Settlement shifted to river valleys, and resource exploitation focused on hunting small game and gathering plant resources (Warren 1968; Byrd and Raab 2007).

Late Holocene (ca. 1650 BCE - 1769 CE)

Numerous cultural adaptations occurred during the Late Holocene. The bow and arrow was adopted sometime after 500 CE, and ceramics are frequently found in sites dating to ca. 1200 CE. Food surpluses, especially of acorns, sustained populations (Byrd and Raab 2007; Kroeber 1925). Other exploited food resources include shellfish, fish, small terrestrial mammals, and small-seeded plants. Late Holocene settlement patterns are characterized by large residential camps linked to smaller specialized camps for resource procurement (Byrd and Raab 2007).

1.2.1.3 Ethnographic Overview

The people who traditionally occupied the region along the Pacific coast from central San Diego County southward into Baja California and eastward into Imperial County were originally referred to by Europeans as the Diegueño or Diegueno, because they lived on the lands allotted to Mission San Diego de Alcalá (Carrico 1987; Gifford 1931). Today, the Native Americans called Diegueno generally refer to themselves as the Kumeyaay (Shipek 1987). Linguistic studies support the division of the Kumeyaay people into northern (Ipai) and southern (Tipai) dialect groups, while often identifying the Desert Kumeyaay of eastern San Diego County, portions of northeastern Baja California, and the western portion of Imperial County as Kamia (Gifford 1931; Luomala 1978). Luomala notes that anthropologists have created “hazily defined” divisions with “cultural and environmental differences shading into one another” (1978:592). Prior to European contact, the boundary between the Kumeyaay groups was not rigid and the distinction between them likely existed as a gradient rather than a clear division of cultural and political units (Carrico 1987). These groups shared closely related Yuman languages, as well as customs, beliefs, and material culture. This report will focus on the Tipai as the project is in the southern portion of Kumeyaay territory.

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The Tipai occupied the Pacific coast from La Jolla south to below Ensenada and Todos Santos Bay in Baja California, Mexico. The Northern Kumeyaay (Ipai) occupied the area north of La Jolla to Agua Hedionda Lagoon. Kumeyaay territory extended inland throughout the Cuyamaca and Laguna mountains into the Yuha and Anza Borrego deserts of Imperial County (Carrico 1987; Luomala 1978). The region includes tremendous environmental variation and resource zones. Neighboring groups included the Luiseño and Cupeño to the northwest, the Cahuilla to the northeast, the Quechan to the east, and the Paipai to the south (Kroeber 1925).

Tipai territory was divided among bands that typically controlled 10 to 30 linear miles in a drainage system and up to the drainage boundaries. Within each band's territory, a primary village and a number of secondary homesteads were located along tributary creeks (Shipek 1982:297). Each band was composed of five to 15 kinship groups (*sibs* or *shiimul*), some of which were divided among more than one band (Kroeber 1925:719; Shipek 1987:8). Approximately 50 to 75 named kinship groups were located throughout the entire Kumeyaay territory.

Tipai winter villages were located in sheltered valleys near reliable sources of water with the entire band present. Dwellings in the relatively permanent winter villages were semi-subterranean and roughly circular, with a wooden pole framework covered with brush thatch. The main entrance had a mat covering to keep out the wind and ensure privacy, and ritually faced the east (Luomala 1978:597). Other structures in the village consisted of family-owned platform granaries, a village-owned brush ceremonial enclosure, and sweat lodges. A semi-circular enclosure was used for the *keruk* mourning ceremony, and a rock wall sometimes surrounded ceremonial and dance areas. At their summer camps, ramadas and windbreaks were common and built into trees or rock shelters. Granaries and housing that was more permanent would sometimes be constructed in frequently visited oak groves in the hills and mountains of Tipai territory. Individuals were cremated and the ashes buried or placed in ceramic urns that were then buried or placed in caves.

Many Tipai camped in coastal valleys at certain times of the year and gathered coastal resources. Fish were taken with hooks, nets and bows, often from tule boats. Shellfish were gathered from the sandy beaches (e.g., *Chione* and *Donax*) and rocky shores (e.g., mussels and abalone). Common game birds included doves and quail; migratory birds included geese. A primary source of protein came from rabbits, woodrats, and other small game living along the mesas and foothills. These animals were caught using throwing sticks, the bow and arrow, or in nets on community drives. Hunting large game such as deer and mountain sheep was the role of expert hunters trained in specialized hunting (Luomala 1978:601). Land resources belonged generally to the bands with only a few areas considered "tribal" land and open to anyone (Shipek 1982:301).

During the winter, small game and seasonal herbs were collected in the valleys. Greens included miner's lettuce, clover, pigweed, and grasses. Seeds were harvested from buckwheat, chia and other salvias, and a variety of grasses. In the mountains and foothills, yucca was gathered for its stalks, flowers, and leaves. Elderberry, manzanita, cholla and prickly-pear *Opuntia* cactus, and juniper shrubs provided berries and fruit. The acorns from several species of oak, gathered during the late summer and stored in family and village granaries, were depended upon heavily. For the Tipai, and many other southern California groups, acorns were the primary staple. They were gathered, pounded into flour, and leached of toxic tannins. During the late spring and summer, small groups foraged in favored spots, usually at progressively higher elevations as various resources ripened (Shipek 1987).

All Kumeyaay practiced plant husbandry to "maintain and increase supplies of native foods" (Shipek 1987:12). These practices included clearing lands for planting seeds of greens, shrubs, and specific

trees; sowing grass seed on burned fields; and transplanting wild onions, tobacco, and cuttings of *Opuntia* (nopales or paddle cactus) near village sites.

Tipai clothing was minimal. Men and children wore utilitarian belt sashes and pouches designed to hold tools and small game, while women wore a one- or two-piece apron made of shredded bark, and a round, twined cap. Robes of rabbit, willow bark, or deerskin were worn in the winter and served as bedding. Sandals woven from agave fibers were worn when traveling long distances (Luomala 1978:599).

Tipai baskets were of high quality and of the same weave and forms found elsewhere in southern California; carrying nets and sacks were also made and used. Pottery was manufactured regularly in the form of water jars, cooking and storage pots, and cremation urns (Kroeber 1925:722). The Tipai made and traded curved clay pipes, stone pipes, and medicine sucking tubes.

Religious mythologies shared by the Tipai and other Kumeyaay groups include abstract spiritual concepts and a higher creator-god (Shipek 1985). *Kuuchama*, or Tecate Peak, was the most sacred landmark. The Kumeyaay believed the peak was designated as the location for acquiring power for good, healing, and peace. Other holy places recognized by all Kumeyaay include *Wee'ishpa* or Signal Mountain, Jacumba Peak, Mount Woodson, Viejas Mountain, and other mountains along the Colorado River in the Desert Kumeyaay region (Shipek 1985, 1987:14). Ceremonies among the Kumeyaay are similar to those of other southern California native peoples (Kroeber 1925: 712-717), including puberty rites, marriage, naming, cremation of the dead, and the annual mourning ceremony (*keruk*) for all those of the sib who died the previous year. The ceremonial leader inherited religious position and conducted these rituals.

1.2.1.4 Historic Overview

The post-Contact history of California is divided into three periods: the Spanish period (1769 – 1822), the Mexican period (1822 – 1848), and the American period (1848 – present). These historical periods are described below.

Spanish Period (1769 – 1822)

In 1542 Juan Rodriguez Cabrillo led the first European expedition to observe present day southern California. That year, he landed on Point Loma, approximately 20 miles from the proposed project site. For more than 200 years, Cabrillo and other Spanish, Portuguese, British, and Russian explorers sailed the Alta (upper) California coast and made limited inland expeditions, but they did not establish permanent settlements (Bean 1968; Rolle 2003).

Gaspar de Portolá and Franciscan Father Junipero Serra established the first Spanish settlement in Alta California at Mission San Diego de Alcalá in 1769. This was the first of 21 missions erected by the Spanish between 1769 and 1823. The Mission and its associated presidio were initially built near the Kumeyaay village of *Cosoy*, near the present site of Old Town San Diego. However, the water supply at this location was low and the soil was not very fertile. Thus, the Mission was moved in 1774 to its present location, near the Kumeyaay village of *Nipaguay* (Mission San Diego 2013; City of San Diego 2006). The missions were responsible for administering to the local tribes and converting the population (Engelhardt 1927a). In 1775 a group of Kumeyaay surrounded Mission San Diego de Alcalá and set fire to the structure and fought against the small contingent of Spanish guards (Carrico 1997). The revolt against the Spanish was likely the result of increased forced conversions, rape, theft of land, and forced imprisonment of Kumeyaay by the Spanish (Carrico 1997).

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During the Spanish period, Spain deeded ranchos to prominent citizens and soldiers, though very few in comparison to the following Mexican period. Presidio commandants were given the authority to grant house lots and garden plots to soldiers and, sometime after 1800, soldiers and their families began to move towards the base of Presidio Hill to receive land grants from the presidio commandants (City of San Diego 2006). To manage and expand their herds of cattle on these large ranchos, colonists enlisted the labor of the surrounding Native American population (Engelhardt 1927b).

Mexican Period (1822 – 1848)

The Mexican period commenced when news of the success of the Mexican Revolution (1810-1821) against the Spanish crown reached California in 1822. This period was an era of extensive interior land grant development and exploration by American fur trappers west of the Sierra Nevada Mountains. The California missions declined in power and were ultimately secularized in 1834. By 1835, the presidio and Mission San Diego de Alcalá had been abandoned and lay in ruins (City of San Diego 2006). The hallmark of the Mexican period was large ranchos deeded to prominent Mexican citizens, frequently soldiers, by the governor.

The Mexican government recognized the newly established Pueblo of San Diego in 1834. The pueblo did not fare as well as other California towns during the Mexican period. Secularization of the missions caused increased hostilities by Native Americans against the *Californios* living in San Diego County during the late 1830s. Attacks on outlying ranchos and an unstable political and economic climate caused the pueblo's population to drop from approximately 500 to 150 permanent residents by 1840. In 1838, San Diego was demoted from pueblo status and made a subprefecture of the Los Angeles Pueblo (City of San Diego 2006).

Rancho El Cajon was a 48,800-acre property located in the present day cities of El Cajon, Bostonia, Santee, Lakeside, Flinn Springs, and the eastern part of La Mesa, San Diego County, California. **Error! Reference source not found.** provides a hand-drawn map of the Rancho. The land was originally called Rancho Santa Monica but was renamed Rancho El Cajon (Brackett 1939). The project site was property of the Rancho El Cajon and was given by Governor Pio Pico to Maria Antonia Estudillo, daughter of Jose Antonio Estudillo and wife of Miguel Pedorena, in 1845 (Hoffman 1862). At this time, the ranch was used for ranching and cattle grazing. Pedorena died suddenly on March 31, 1850 and was buried in Old Town, San Diego (Haggland 1983). After his death, his wife built houses and corrals at the ranch and harvested large crops but she died shortly after on February 3, 1851. Thomas W. Sutherland, guardian of Pedorena's heirs, filed a claim for Rancho El Cajon with the Public Land Commission, as required by the Land Act of 1851, in 1852 and was granted a patent in 1876. During the Civil War, their heirs began to sell parts of the ranch (Haggland 1983).

Figure 3 Rancho El Cajon Land Grant

Source: University of California, Berkeley 2011

American Period (1848 – Present)

The American period in San Diego County began as early as 1846 when the United States (US) military occupied San Diego and effectively ended *Californio* resistance in 1847. The American government assumed formal control of Alta California with the signing of the Treaty of Guadalupe Hidalgo in 1848, in which the US agreed to pay Mexico \$15 million for the territory that included California, Nevada, Utah, and parts of Colorado, Arizona, New Mexico, and Wyoming.

During the early American period, cattle ranches dominated much of Southern California, although droughts and population growth resulted in farming and urban professions supplanting ranching through the late 19th century. After the US took control of San Diego in 1846, the political and economic situation stabilized and population increased. The discovery of gold in northern California in 1848 led to the California Gold Rush, which resulted in a massive population increase (Guinn 1977). By 1853, the population of California exceeded 300,000. Thousands of settlers and immigrants continued to pour into the state, particularly after the completion of the transcontinental railroad in 1869. By the 1880s, the railroads had established networks throughout southern California, resulting in fast and affordable shipment of goods, as well as means to transport new residents (Dumke 1944).

San Diego County

San Diego County was organized formally in February 1850 and grew slowly during the 1860s. The mid-1800s saw the urbanization of the County thanks to the development and promotion of the area by Alonzo Horton, who offered free lots to anyone who would build a house worth \$500. The Santa Fe Railroad began construction in 1880 with the first trains arriving in 1882. After several population booms, San Diego reached a population of 35,000 by 1888. The population fell to 17,000 in 1890 because of a real estate market crash (City of San Diego 2006).

The 20th century brought further development to San Diego. John D. Spreckels launched a major building campaign with the purpose of modernizing the city. Summer cottage retreats began to develop in the beach communities of Ocean Beach and La Jolla. Improvements in public transportation caused development to spread to the areas of University Heights, Greater North Park, and Mission Hills. In 1915, the Panama-California Exposition was held in San Diego in celebration of the opening of the Panama Canal (City of San Diego 2006).

During the 1920s, San Diego's population grew from 74,683 to 147,897 due to the Panama-California Exposition and efforts to attract the US Navy to San Diego. The naval and military presence provided the population and economy that allowed the city and county's further development (City of San Diego 2006).

San Diego County continues to be an important military center. One of the largest metropolitan areas in California, San Diego County is a popular vacation destination known for its beaches, mild climate, and urban events.

El Cajon

Originally known as "The Big Box Valley" and "The Corners", the city of El Cajon's growth is due to its role as the communications center and agrarian heartland of San Diego County. In the search for pastureland, mission padres and early 19th century explorers came to the El Cajon Valley as it provided a natural barrier for their cattle and provided a rainfall watershed, supporting the mission cattle. No permanent settlement of El Cajon was documented until 1870 when a school and homestead was documented at Park and Magnolia, approximately 1.5-miles south of the project site. In 1868, the Pedorena's Rancho Cajon holders were purchased, clearing settlements and squatters that came west following the American Civil War. Later, in 1876, the commercial building was constructed, and El Cajon started to grow even more. El Cajon emerged and flourished as a citrus, avocado, grape and raisin center as the soil and climate promoted excellent produce production. The expansion of El Cajon was further supported by gold mining operations. In 1912, the constituents voted to incorporate a 1 ¼ square mile area of El Cajon, creating a city attorney, president, and committees. As the city grew through World War II, the population erupted and by 1960, the city's incorporation was increased to 9.8 square miles and a population of 37,618 individuals. El Cajon continues to grow, and the appointed officials work to provide a balanced economy and governmental structure for municipal services to meet such growth (El Cajon, n.d.).

1.2.2 Records Search Results

Background research for this Archaeological Resources Assessment included a records search, a review of historical maps and aerial photographs, a Sacred Lands File search, and Native American outreach. A summary of each of these efforts follows.

1.2.2.1 California Historical Resources Information System

On April 21, 2021, Rincon received records search results for the proposed project from the California Historical Resources Information System (CHRIS) at the South Coastal Information Center (SCIC) at San Diego State University. The purpose of the records search was to identify previously conducted cultural resources studies and previously recorded cultural resources located within the project site and within a 0.5-mile radius of the project site. In addition to the SCIC records search, a review of the NRHP, CRHR, the Built Environment Resources Directory, and the Archaeological Determinations of Eligibility list was conducted. Appendix A provides a summary of the records search results.

Previous Cultural Resources Studies

The SCIC records search identified 21 previously conducted cultural resources studies conducted within the 0.5-mile radius of the project site (**Error! Reference source not found.**, Attachment B), one (SD-09460/SD-14599) which encompassed the current project site. The study is discussed in more detail below.

Table 1 Previous Cultural Resource Studies within a 0.5-Mile Radius of the Project Site

Report Number	Author(s)	Year	Title	Relationship to Project Site
SD-00863	Fink, Gary	1973	<i>Archaeological Survey for the Proposed Forester Creek Drainage Channel Project</i>	Outside
SD-01507	Van Wormer, Stephen	1989	<i>Historical, Architectural, and Archaeological Assessment of the Somers-Linden Farmstead Complex</i>	Outside
SD-01821	Carrico, Richard	1977	<i>Archaeological Survey of the Bradley Avenue Apartment Complex</i>	Outside
SD-02085	Environmental Horizons, Inc.	1980	<i>Draft Environmental Impact Report for the Bradley-Graves Development</i>	Outside
SD-02411	Smith, Brian	1992	<i>Results of an Archaeological Survey and the Evaluation of an Existing Residence at the Elias Subdivision Project</i>	Outside
SD-02472	Smith, Brian	1992	<i>Extended Initial Study Submittal and Request for Appeal of Draft Environmental Impact Report Requirement - Elias Subdivision</i>	Outside
SD-03098	Smith, Brian	1992	<i>Results of a Cultural Resources Study of the Padre Dam Municipal Water District Phase I Reclaimed Water System Project</i>	Outside
SD-03610	Smith, Brian and Larry Pierson	1998	<i>An Archaeological/Historical Study for the Trenfel Subdivision Project</i>	Outside
SD-07550	Duke, Curt	2002	<i>Cultural Resources Assessment Cingular Wireless Facility No. SD 809-01 San Diego County, California</i>	Outside
SD-08224	Van Wormer, Stephen	1989	<i>Historical/Architectural Assessment of the Somers-Linden Farmstead Complex; 1333 Lindenwood Drive, El Cajon</i>	Outside
SD-09083	Kyle, Carolyn	2002	<i>Cultural Resource Assessment for Cingular Wireless Facility SD No. 767-02, City of El Cajon, San Diego County, California</i>	Outside

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Report Number	Author(s)	Year	Title	Relationship to Project Site
SD-09222	Environmental Horizons, Inc.	1980	<i>Draft EIR for the Bradley-Graves Development</i>	Outside
SD-09460	McGinnis, Patrick and Michael Baksh	2005	<i>Cultural Resources Survey of the Bradley Avenue Road Widening Project, County of San Diego, California</i>	Within
SD-10575	Smith, Brian	1992	<i>Results of an Archaeological Survey and the Evaluation of an Existing Residence at the Elias Subdivision Project</i>	Outside
SD-12404	Pierson, Larry	2009	<i>A Historical Assessment of the 988 Pepper Drive Project, El Cajon, San Diego County, California, APN 388-072-03</i>	Outside
SD-13409	Tennesen, Kristin	2012	<i>ETS #22127, Cultural Resources Monitoring for the Intrusive Inspections, 4206 Poles, Santee Subarea Project, San Diego County, California (HSR # 177995)</i>	Outside
SD-14599	McGinnis, Patrick, and Michael Baksh	2005	<i>Cultural Resources Survey of the Bradley Avenue Interchange Project County of San Diego, California</i>	Within
SD-17233	Brunzell, David	2017	<i>San Diego 129 Project, San Diego County, California (BCR Consulting Project No. SYN1622)</i>	Outside
SD-17491	Robbins-Wade, Marry ad Dominique Diaz De Leon	2018	<i>Cultural Resources Survey Report – Negative Findings, 1181 N. Anza Street Townhomes Project, El Cajon, San Diego County, California PDS2018-TM-5628</i>	Outside
SD-18001	Bruce, Bonnie and Carrie Wills	2018	<i>Archaeological Sensitivity Assessment for CRAN_RSDL_CAL06901F, Small Cell, Adjacent to 340 Hart Drive, El Cajon, San Diego County, California (EBI Project No. 6118005080)</i>	Outside
SD-18019	Harding, Tory	2017	<i>Archaeological Survey Report 67 and Bradley/SD0845/FA 13867492, 1467 N. Magnolia Avenue, El Cajon, California 92020, San Diego County</i>	Outside

Source: SCIC 2021

SD-09460/SD-14599

Patrick McGinnis and Michael Baksh, PhD, of Tierra Environmental Services prepared study SD-09460, *Cultural Resources Survey of the Bradley Avenue Road Widening Project, County of San Diego, California*, and study SD-14599, *Cultural Resources Survey of the Bradley Avenue Interchange Project County of San Diego, California*, in 2005. The two reports were identified by the SCIC as separate reports; however, upon review of the studies the reports are the same except in the following areas: slightly different project names; Section 106 Oversight Review and Approval by the California Department of Transportation District 11 Senior Environmental Planner on the cover page of study SD-14599; placement of the project location figures on different pages; different formatting of the survey results and recommendations; and, lastly, inclusion of appendices in study SD-14599. A summary of the study is included below.

The study was conducted to determine the effects of the road widening project, including but not limited to on-ramp and off-ramp modifications, overcrossing widening, modification of turn lanes, and intersection improvements. The study consisted of background research, review of previous studies and site records, a cultural resources survey, and Native American outreach. One resource

was previously recorded within that study's project area, outside of the current project site; however, no cultural resources were identified during the cultural resources survey of the area of potential effects. Although no further testing was recommended for the project, McGinnis and Baksh (2005a) recommended archaeological monitoring for the road widening project due to the sensitive nature of the area. The study included the entirety of the current project site.

Previously Recorded Cultural Resources

The SCIC records search identified 16 previously recorded cultural resources located within a 0.5-mile radius of the project site, none of which are recorded within the current project site. Only one of the 16 previously recorded resources (P-27-005997) contains prehistoric artifacts. Resource P-27-005997 is located within approximately 0.2-mile of the current project site. The prehistoric/historic site was recorded by S. Carrico of Westec Services, Inc. at an unknown date and is described as an extensive lithic, ceramic, milling, and historic trash dump site. Results of a survey identified 311 artifacts including mano fragments, a hammer/pounder, flakes, debitage, prehistoric ceramic pieces, projectile points, bone fragments, a scraper, and a historic-period trash deposit. The survey also identified 237 milling features on 58 bedrock outcrops. **Error! Reference source not found.** below summarizes the previously recorded resources within a 0.5-mile radius of the project site.

Table 2 Previously Recorded Resources within a 0.5-mile Radius of the Project Area

Primary Number	Trinomial	Resource Type	Description	Recorder(s) and Year(s)	NRHP/ CRHR Status	Relationship to Project Site
P-37-005997	CA-SDI-5997	Prehistoric / Historic Site	Milling site and trash refuse	S. Carrico, date unknown	Not evaluated	Outside
P-37-016565	–	Historic Building/ Structure	Italian Renaissance farmhouse	1999 (Pierson, L.)	7: Not Evaluated, or Needs Re-evaluation for NRHP or CRHR 7:	Outside
P-37-017465	–	Historic Building	Old Boarding House	1985 (Brandes, R.)	Not evaluated	Outside
P-37-017495	–	Historic Building	William Treantefeles House	1985 (Brandes, R.)	Not evaluated	Outside
P-37-017496	–	Historic Building	Robert Barnett House	1985 (Brandes, R.)	Not evaluated	Outside
P-37-017562	–	Historic Building	Rogers House	1985 (Brandes, R.)	Not evaluated	Outside
P-37-017583	–	Historic Building	Somermont	1985 (Brandes, R.)	Not evaluated	Outside
P-37-017648	–	Historic Building	Wright House	1985 (Brandes, R.)	Not evaluated	Outside

Primary Number	Trinomial	Resource Type	Description	Recorder(s) and Year(s)	NRHP/CRHR Status	Relationship to Project Site
P-37-017649	–	Historic Building	Frances Woodward Home	1985 (Brandes, R.)	Not evaluated	Outside
P-37-017659	–	Historic Building	Bates Home/ Cutter/ Horner Home	1985 (Brandes, R.)	Not evaluated	Outside
P-37-017666	–	Historic Building	Smith House	1985 (Brandes, R.)	Not evaluated	Outside
P-37-017668	–	Historic Building	Hannibal Home	1985 (Brandes, R.)	Not evaluated	Outside
P-37-017685	–	Historic Building	Northcutt Home/ Shield Home	1985 (Brandes, R.)	Not evaluated	Outside
P-37-017704	–	Historic Building	Hitchcock Home	1985 (Brandes, R.)	Not evaluated	Outside
P-37-017713	–	Historic Building	Olivier House	1985 (Brandes, R.)	Not evaluated	Outside
P-37-027462	–	Historic Building	Somers-Linden Farmstead Complex	2002 (Beddow, D.)	7: Not Evaluated, or Needs Re-evaluation for NRHP or CRHR	Outside

Source: SCIC 2021

1.3 Regulatory Setting

1.3.1 California Environmental Quality Act

The California Environmental Quality Act (CEQA) requires a lead agency to determine whether a project may have a significant effect on historical resources (Public Resources Code [PRC], Section 21084.1) or tribal cultural resources (PRC Section 21074[a][1][A]-[B]). A historical resource is a resource listed, or determined to be eligible for listing in the California Register of Historical Resources (CRHR); a resource included in a local register of historical resources; or an object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (State CEQA Guidelines, Section 15064.5[a][1-3]).

A resource shall be considered historically significant if it meets any of the following criteria:

- 1) Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage; or
- 2) Is associated with the lives of persons important to our past; or

- 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.

Generally, a cultural resource must be at least 50 years of age to be considered for listing on the CRHR. Resources that have achieved significance in less than 50 years may also be eligible for inclusion in the CRHR, provided that enough time has lapsed to obtain a scholarly perspective on the events or individuals associated with the resource.

If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that resources cannot be left undisturbed, mitigation measures are required (PRC Section 21083.2[a], [b]).

PRC Section 21083.2(g) defines a unique archaeological resource as an artifact, object, or site about which it can be demonstrated clearly that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- 1) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;
- 2) Has a special and particular quality such as being the oldest of its type or the best available example of its type;
- 3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.

1.3.2 County of San Diego

The County addresses impacts to archaeological and cultural resources in the County's Guidelines for Determining Significance for Cultural Resources: Archaeological and Historical Resources. The measures listed in the document are found in Section 2 of this report. In addition, the following regulations also apply to the project.

Resource Protection Ordinance

The majority of development in the County is subject to Resource Protection Ordinance (RPO). This ordinance requires that cultural resources be evaluated as part of the County's discretionary environmental review process and if any resources are determined significant under RPO, they must be preserved. RPO prohibits development, trenching, grading, clearing, and grubbing, or any other activity or use that may result in damage to significant prehistoric or historic site lands, except for scientific investigations with an approved research design prepared by an archaeologist certified by the Society of Professional Archaeologists.

Conservation and Open Space Element of the San Diego County General Plan (Chapter 5)

The Conservation and Open Space Element of the San Diego County General Plan provides direction to future growth and development in the County of San Diego through the conservation, management, and utilization of natural and cultural resources, the protection and preservation of open space, and the provision of park and recreation resources.

The Conservation and Open Space Element outlines goals and policies for several elements including cultural resources listed below:

GOAL COS-7 Protection and Preservation of Archaeological Resources. Protection and preservation of the County's important archeological resources for their cultural importance to local communities, as well as their research and educational potential.

Policies

COS-7.1 Archaeological Protection. Preserve important archaeological resources from loss or destruction and require development to include appropriate mitigation to protect the quality and integrity of these resources. The importance of archaeological resources must be evaluated from the perspective of the affected community, including local tribes, in addition to the definitions contained in the California Public Resources Code. Input from the affected community on the importance of cultural resources through the consultation process is important in determining what resources should be preserved and what constitutes appropriate mitigation.

COS-7.2 Open Space Easements. Require development to avoid archeological resources whenever possible. If complete avoidance is not possible, require development to fully mitigate impacts to archaeological resources. Avoidance of archaeological resources is normally achieved through the design of the development project in conjunction with the use of open space easements that protect the resources. If complete avoidance is not possible, other forms of mitigation, including data recovery excavations and the incorporation of archaeological features into the project design on a case-by-case basis may be appropriate. The determination of what constitutes adequate mitigation should be based on meaningful consultation with the affected community, including local tribes.

COS-7.3 Archaeological Collections. Require the appropriate treatment and preservation of archaeological collections in a culturally appropriate manner. The determination of what constitutes appropriate treatment and preservation of archaeological collections should be based on existing federal curation standards in combination with consultation with the affected community, such as the tribes. Many collections should be placed in a local collections curation facility that meets federal standards per 36 CFR Part 79. The proper storage and treatment of these collections should also be based on consultation with the affected community, such as the tribes. In addition, existing federal and state law governs the treatment of certain cultural items and human remains, requires consultation, and in some circumstances, repatriation. The County is committed to conduct an inventory of collections it holds or are held by cultural resources consulting firms.

COS-7.4 Consultation with Affected Communities. Require consultation with affected communities, including local tribes to determine the appropriate treatment of cultural resources. Consultation should take place with the affected communities concerning the appropriate treatment of cultural resources, including archaeological sites, sacred places, traditional cultural properties, historical buildings and objects, artifacts, human remains, and other items. The County is required by law, Senate Bill 18 Protection of Traditional Tribal Cultural Places (SB-18), to consult with the appropriate tribes for projects that may result in major land use decisions including General Plans, General Plan Amendments, Specific Plans and Specific Plan Amendment. In addition to these types of permits, it is County policy to consult with the appropriate tribes on all other projects that contain or are likely to contain,

archaeological resources. Consultation may also include active participation by the tribes as monitors in the survey, testing, excavation, and grading phases of the project.

COS-7.5 Treatment of Human Remains. Require human remains be treated with the utmost dignity and respect and that the disposition and handling of human remains will be done in consultation with the Most Likely Descendant (MLD) and under the requirements of Federal, State and County Regulations. Human remains, including ancestral Native American remains, should be left undisturbed and preserved in place whenever possible. For most development permits, this is required by the County's Resource Protection Ordinance. In the event that human remains are discovered during any phase of an archaeological investigation, the requirements of State and local laws and ordinances, including notification of and consultation with appropriate tribal members, must be followed in determining what constitutes appropriate treatment of those remains.

COS-7.6 Cultural Resource Data Management. Coordinate with public agencies, tribes, and institutions in order to build and maintain a central database that includes a notation whether collections from each site are being curated, and if so, where, along with the nature and location of cultural resources throughout the County of San Diego. This database should be accessible to all qualified individuals while maintaining the confidentiality of the location and nature of sensitive cultural resources, such as archaeological sites. The County maintains a partnership with the local repository of the database, the South Coastal Information Center at San Diego State University, which provides direct access by qualified County personnel to the database so that the information it contains may be used to design development projects to avoid cultural resources at an early point in the process.

GOAL COS-8 Protection and Conservation of the Historical Built Environment. Protection, conservation, use, and enjoyment of the County's important historic resources.

Policies

COS-8.1 Preservation and Adaptive Reuse. Encourage the preservation and/or adaptive reuse of historic sites, structures, and landscapes as a means of protecting important historic resources as part of the discretionary application process, and encourage the preservation of historic structures identified during the ministerial application process. Historic buildings, objects, trails, landscapes and districts are important parts of the multi-cultural heritage of San Diego County and should be preserved for the future enjoyment and education of the County's diverse populations. Preservation and adaptive reuse of these resources should be encouraged during the planning process and an emphasis should be placed on incentives for preservation, such as the Mills Act property tax program, in addition to restrictions on development, where appropriate.

COS-8.2 Education and Interpretation. Encourage and promote the development of educational and interpretive programs that focus on the rich multicultural heritage of the County of San Diego. The County should continue to develop educational and interpretive programs that focus on the history of San Diego County, including but not limited to the important historical resources located on County parks, such as the Adobe at Rancho Penasquitos and Rancho Guajome. Such programs should be for residents and visitors of all ages from all communities and should include docent and self-guided tours, interpretive signage, kiosks, informational pamphlets, books and other audio-visual materials.

Mills Act (San Diego County) – Historical Property Contracts, 2002

Ordinance 9425 amended by Ordinance 9628 provides for reduced property taxes on eligible historic properties, if the owner agrees to maintain and preserve the property. Preservation of properties is to be in accordance with the standards and guidelines set forth by the Secretary of the Interior. The Mills Act serves as an economic incentive to owners to preserve their historic properties for the benefit of the entire community.

San Diego County Local Register of Historical Resources, 2002

The San Diego County Local Register’s purpose is to develop and maintain, “an authoritative guide to be used by state agencies, private groups, and citizens to identify the County’s historical resources and to indicate which properties are to be protected, to the extent prudent and feasible, from substantial adverse change.” Sites, places, or objects, which are eligible to the National Register or California Register, are automatically included in the San Diego County Local Register. 7 Ordinance 9842, County Administrative Code §86.601-86.608. 8 Ordinance 9425 and 9628, County Administrative Code §88.6-88.19. 9 Ordinance 9493, County Administrative Code §396.7. Guidelines for Determining Significance 10 Cultural Resources: Archaeological and Historic Resources

San Diego County Historic Site Board, 2000

The function of the County of San Diego Historic Site Board (Advisory Body) is to provide decision makers with input regarding cultural resources (archaeological and historic). The Historic Site Board is responsible for reviewing resources seeking participation in the Mills Act and projects with significant cultural resources.

Zoning Ordinance

Sections 5700-5749 of the Zoning Ordinance provide the procedures for landmarking Historic/Archaeological resources with an “H” (Historic) Designator. The application of this designator to a property requires the owner to submit and receive approval by the Department of Planning and Land Use of a site plan for any changes to the exterior of a resource. In addition, it identifies the only situations in which a landmarked resource may be demolished or relocated.

The “J” Designator is reserved for the Julian Historic District. In addition to the requirements of the “H” Designator, “J” Designated properties are referred to the Julian Historic District Architectural Review Board for recommendation.

2 Guidelines for Determining Significance

2.1 CEQA Guidelines

Section 15064.5(b) of the State CEQA Guidelines identifies an adverse environmental impact to historical resources as:

Substantial Adverse Environmental Impact

(b) A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.

(1) Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.

(2) The significance of an historical resource is materially impaired when a project:

- a. Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or
- b. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- c. Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

The County additionally addresses impacts to archaeological and cultural resources in the County's Guidelines for Determining Significance for Cultural Resources: Archaeological and Historical Resources. The measures listed in the document are found in Section 2.3 and are listed below (County of San Diego 2007).

2.2 County Guidelines for Determining Significance – Cultural Resources

According to the County's Guidelines (County of San Diego 2007a: 21–22), any of the following will be considered a potentially significant impact to cultural resources:

1. The project causes a substantial adverse change in the significance of a historic resource as defined in Section 15064.5 of the State CEQA Guidelines. This shall include the destruction,

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disturbance or any alteration of characteristics or elements of a resource that cause it to be significant, in a manner not consistent with the Secretary of Interior Standards.

2. The project causes a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the State CEQA Guidelines. This shall include the destruction or disturbance of an important archaeological site or any portion of an important archaeological site that contains or has the potential to contain information important to history or prehistory.
3. The project disturbs any human remains, including those interred outside of formal cemeteries.
4. The project proposes activities or uses damaging to significant causes a substantial adverse change in the significance of a tribal cultural resources as defined under CEQA Section 21074.
5. The project proposes activities or uses damaging to significant cultural resources as defined by the Resource Protection Ordinance and fails to preserve those resources.

Guidelines 1 and 2 are derived directly from CEQA. Sections 21083.2 of CEQA and 15064.5 of the State CEQA Guidelines recommend evaluating historical and archaeological resources to determine whether or not a proposed action would have a significant effect on unique historical or archaeological resources. Guideline 3 is included because human remains must be treated with dignity and respect and CEQA requires consultation with the "Most Likely Descendant" as identified by the Native American Heritage Commission (NAHC) for any project in which human remains have been identified. Although not currently included in the County's Guidelines, Guideline 4 is included because Tribal Cultural Resources are important to local Native American communities and may include sacred sites and traditional use areas that have been used over multiple generations. Guideline 5 was selected because the Resource Protection Ordinance requires that cultural resources be considered when assessing environmental impacts. Any project that would have an adverse impact (direct, indirect, and cumulative) on significant cultural resources as defined by this Guideline (5) would be considered a significant impact. The only exemption is scientific investigation.

All discretionary projects are required to conform to applicable County standards related to cultural resources. These include requirements listed in the Zoning Ordinance, General Plan, and the Grading, Clearing and Watercourses Ordinance (Section 87.429). Non-compliance would result in a project that is inconsistent with County standards, which is itself a significant impact under CEQA.

3 Analysis of Project Effects

3.1 Methods

3.1.1 Survey Methods

Rincon Archaeologist Rachel Bilchak, BS, BA, Registered Archaeologist (RA), conducted a pedestrian survey of the project site on May 12, 2021. The project site was surveyed using transects spaced 10 meters apart and generally oriented east-west. Areas of exposed ground surface were examined for artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools, ceramics), ecofacts (marine shell and bone), soil discoloration that might indicate the presence of a cultural midden, historic-period debris (e.g., metal, glass, ceramics), and features indicative of the former presence of structures or buildings (e.g., standing exterior walls, foundations) or historic-period debris (e.g., metal, glass, ceramics).

Rincon Principal Investigator Breana Campbell-King, MA, RPA, Rincon archaeologist Mark Strother, MA, RPA, and Ms. Bilchak conducted a follow-up site visit on May 20, 2021 to inspect the southeast corner of the project site that was in accessible during the initial visit due to a locked gate.

3.1.2 Native American Heritage Commission

Rincon contacted the Native American Heritage Commission (NAHC) on April 19, 2021, to request an SLF search of the project site. As part of this request, Rincon asked the NAHC to provide a list of Native American groups and/or individuals culturally affiliated with the area who may have knowledge of cultural resources within the project site. The NAHC responded on May 19, 2021, stating the results of the SLF search were positive. The NAHC response can be found in Appendix B of this report. On May 20, 2021, Rincon attempted to contact Mr. Clint Linton to discuss the project but a specific response regarding the project was not received.

Ms. Lisa Cumper, Tribal Historic Preservation Officer for the Jamul Indian Village was contacted to provide tribal monitoring for the project. Erica Gonzalez provided tribal monitoring during the pedestrian survey.

3.1.3 Aerial Imagery and Historical Topographic Map Review

Rincon completed a review of historical topographic maps and aerial imagery to ascertain the development history of the project site. Historical topographic maps dating from 1893 to 1939 depict the project site as undeveloped land within the city of El Cajon. According to the historical topographic maps, from 1941 to 1964, the project site is bound by East Bradley Avenue to the north, and a dirt road traverses south through the project site to a building. Aerial imagery from 1953 shows that the project site was developed with a curved building and circular fountain or landscaping feature and bound by East Bradley Avenue to the north (NETR Online2021); however, by a 1964 aerial of the property, the two extant buildings were constructed, with Building 2 attached to the curved building. The buildings were constructed in 1960 (*San Diego Union*, October 2, 1960). From 1969 to 1996, historical topographic maps depict the project site with the current buildings. Aerial imagery from 2000 depicts the project site in its current condition with the addition

of landscaping and parking areas (NETR Online 2021; USGS 2021). Furthermore, aerial imagery and topographic maps depict the San Diego River approximately 2.6 miles north of the project site, and Forester Creek approximately 1.4 miles west of the project site.

3.2 Survey Results

Exposed soils throughout the project site consist of medium-brown sandy loam, alluvium, typically intermixed with gravel. Approximately 10 percent of the project site is undisturbed while 90 percent of the project site is partially developed with the building being concentrated on the southern half of the project site. Previous ground disturbance in the undeveloped portions of the lot is visible and includes evidence of vegetation removal, grading, and stockpiling of dirt and other materials. Ground visibility within the undeveloped areas was generally excellent, approximately 100 percent. Areas of exposed ground surface are limited to the southeast area of the project site. There was a steep cut slope on the southeast of the project site. Brick fragments, modern glass, and ceramics were observed during the current survey efforts. Additionally, boulders were observed in the south-central area of the project site. No artifacts or features were identified during this survey. Photograph 1 through Photograph 6 depict project site conditions during the current efforts.

Of important note, there is a known milling complex immediately southwest of the project site; however, the milling feature is not fully documented. Rincon did not record the feature as part of the current survey efforts.

Photograph 1 Northwest Corner Entrance, View Northwest



Photograph 2 Graded Disturbed Soil, View East



Photograph 3 Building 1, View South



Photograph 4 Exposed Soils and Boulders Near South-Central Edge of Project Site, View West



Photograph 5 Brick Fragments, and Modern Glass and Ceramics, View East



Photograph 6 Steep Drop-Off On The Eastern Side of the Project Area, View Southeast

3.2.1 Historical Resources

The Bradley Court Convalescent Center project site contains two Modern California Ranch-style buildings constructed by the Brunson Sanitarium and Major's Nursing and Convalescent Home in 1960.

Physical Description

The Bradley Court Convalescent Center, addressed as 675 East Bradley Avenue, is located on an approximately 3.4-acre lot in a north-south orientation south of Bradley Avenue. The property is surrounded by single and multi-family residential properties at the northern city limits of El Cajon. A large section of undeveloped land creates a setback between the street and the two Modern California Ranch buildings, both constructed in 1960, which are accessible by a paved driveway along the western property line (Photograph 7).

Building 1 is a one-story, irregularly U-shaped 7,039sqft building which sits low to the ground at the center of the lot with the driveway and parking lot to the west (

Photograph 8). The cross-gable roofline with composition shingles and a wide enclosed eave overhang contributes to the Modern Ranch style, along with the stucco siding painted brown with

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white accent trim. Throughout are aluminum and vinyl sash and casement windows with wood framing. The front entrance is on the west elevation within a cross-gable extension and is set back under a porch cover of the primary roofline supported by square porch posts. All of the entrances, including the front entrance, have large openings with flush metal doors large enough for clearance of a wheelchair or hospital bed; the entrances have side lights and are all gated and locked for the patients' safety. The side entrances all have a cantilever porch cover with composition shingles. Within the U-shape outside of the building is an employee break area covered by a corrugated metal porch cover, which was constructed with the building in 1960. The eastern leg of the U-shaped plan was constructed between 1964 and 1966. There are domed metal and louvered vents throughout the roofline.

Building 2 is sited southeast of Building 1 with a large undeveloped section of land to its west (Photograph 9). The one-story irregularly L-shaped Modern California Ranch building sits low to the ground and is gated along the perimeter. The 5,874sqft building has a stucco exterior painted brown with white accent trim and has a side-gable roofline with composition shingles and a wide enclosed eave overhang. There are vinyl and aluminum sash, casement, and hopper windows throughout with wood framing. The entrance is on the north elevation of the east-west section of the building with a large ramp leading to the entrance. On the north elevation of the north-south leg is a recessed porch within the volume of the building with wood railings and posts and a ramp for access. The east-west leg has a lower roofline than the main portion of the building.

Photograph 7 Vacant portion between Bradley Avenue and Building 1, View East



Photograph 8 West Elevation of Building 1, View Southeast



Photograph 9 West Elevation of Building 2, View Southeast



Site Development

Before construction of the two Modern California Ranch style care buildings in 1960, the 675 East Bradley Avenue property, Lot 7 Block 2 of the La Bonita Park Tract, was developed with a circular-shaped building at the southern end of the property with a circular fountain or landscaping feature at the center of the lot (NETRonline, 1953). The original function and date of construction of this building was not identified as directories and aerials are not available for El Cajon pre-1953. However, an easement was created in 1925 with San Diego Gas and Electric Company for public utilities, appurtenances, ingress and egress purposes; therefore, the curved building was most likely constructed at that time (Anacal Engineering Company, 2019).

In 1956, the lot was purchased by Earl Major, local developer, who owned several sanitariums and nursing homes in the San Diego area, including the Woodside Manor Rest Home in Lakeside, California. That year, Mr. Major applied for a permit to construct the current sanitarium / convalescent home on the Bradley Avenue property by contractor W.F.W. Blackwell (*San Diego Union*, August 5, 1956). The Bradley Avenue property replaced another sanitarium owned by Mr. Major which was closing due to eminent domain for the airport. In 1960, the Bronson Sanitarium and Major's Nursing and Convalescent Home was officially open with Mrs. Mae B. Brunson acting as Administrator of the sanitarium (*Chula Vista Star-News*, May 13, 1965). The only alteration to the site during Mr. Major's ownership was the addition of the eastern leg of the U-shaped Building 1 between 1964 and 1966 (NETRonline, 1964 and 1966).

By 1967, the subject property was purchased by the Perkins Brothers from Mr. and Mrs. Earl Major, who continued to run the property as a convalescent and nursing home (*San Diego Union*, April 9, 1967). They renamed the site to the Bradley Convalescent Home in 1969 and tore down the ca. 1953 curved section of Building 2 between 1971 and 1978; only the portion directly adjacent to the north-south portion is still extant. During their ownership, the structure northeast of Building 2 was constructed by 1988, and the shed structure east of Building 1 was constructed circa 1994. The Perkins Brothers, later known as Perkins Properties LP, hired Healthcare Management Systems, Inc. to manage the site in 2001 and renamed the facility to its current name, The Bradley Court (*San Diego Union*, March 28, 1969; *North County Times*, August 9, 2001). In 2020, Perkins Properties sold The Bradley Court to its current owner, El Cajon Real Estate LLC.

4 Interpretation of Resource Importance and Impact Identification

4.1 Resource Importance and Evaluation

No prehistoric resources were identified as part of the pedestrian survey completed for this project. Rincon understands the project site is located in an area of sensitivity for prehistoric resources however no prehistoric resources were recorded on the project site.

Based on historical research, the Bradley Court Convalescent Center property at 675 East Bradley Avenue is recommended ineligible for the California Register of Historic Resources (CRHR) and the San Diego County Local Register (Local Register).

The property was found not eligible under CRHR / Local Register Criterion 1 / V(b)(1) for making a significant contribution to the broad patterns of local or state history. The Brunson Sanitarium and Major's Nursing and Convalescent Home was not the first sanitarium or convalescent / nursing home in the El Cajon or San Diego County area. Sanitariums date back to the late 1800s, with notable examples such the Mt. Ecclesia Sanitarium in Oceanside, the McCulloch Sanitarium in San Diego, and a private sanitarium run by Drs. Gochenauer and Fiest circa 1900 also in San Diego (San Diego History Center, 2021). Nursing homes / convalescent homes have also been in the area since circa 1904 with St. Joseph's Nursing Home in San Diego as the first identified home in the area (San Diego History Center, 2021). The Brunson Sanitarium was a continuation of the established care facility and resting home concept in the area and was also not Earl Major's first nursing home as well. Therefore, the property is not recommended eligible under Criterion 1 / V(b)(1).

The subject property was also found not eligible under Criterion 2 / V(b)(2) for an association with the lives of persons important in local, state, or national history. Upon research of the owners and individuals associated with the 675 East Bradley Avenue property, none of the individuals were found significant in local or state history. Mr. Earl Major was contributing to a needed care of the elderly and mentally disabled; however, he was not the first to build a convalescent/nursing home in the area and did not create any revolutionary techniques or technology in nursing home / sanitarium care. No information was gleaned on Mrs. Mae B. Brunson outside of her work as the Administrator of the Brunson Sanitarium; therefore, the property is recommended ineligible under Criterion 2/ V(b)(2).

The two care facilities on the 675 East Bradley Avenue property are examples of the Modern California Ranch architectural style popular in the El Cajon area from 1950 to 1975. The style was popularized by Master Architect Cliff May through articles in *Sunset Magazine* and his book *Western Ranch Houses*. Modern California Ranch buildings are typically one-story, low to the ground with a large horizontal massing. They have prominent low-sloped gabled or hipped roofs with deep overhangs and sprawling floor plans frequently "L" or "U" shaped around a central courtyard (*San*

Diego Modernism Historic Context Statement, 73). The buildings exhibit modest elements of the Modern California Ranch style; they are not exceptional examples of the style. They lack the custom detailing seen in other examples such as decorative concrete block walls, prominent chimneys, or multi-lite windows with shutters. Therefore, the property is not recommended under Criterion 3 / V(b)(3) as an example of the Modern California Ranch style.

Very little information was also gleaned on contractor, W.F.W. Blackwell. Newspaper articles were identified for the construction of homes and an apartment building by Blackwell, but no other information was identified. Little information was found to create a full body of work for W.F.W. Blackwell and their importance to the construction industry; therefore, the property is not recommended eligible under Criterion 3 / V(b)(3).

The 675 East Bradley Avenue property is unlikely to yield information important to the prehistory or history of the local area, California, or the nation; therefore, it is not recommended eligible under Criterion 4 / V(b)(4).

4.2 Native American Heritage Values

Based upon the SLF search conducted in 2021 by the NAHC, the NAHC returned positive results in the El Cajon South Quadrangle. During the current archaeological evaluation, no artifacts or remains were identified or recovered. Rincon understand the County of San Diego is engaged in Native American consultation through the CEQA AB 52 process and additional information regarding Native American heritage resources may be disclosed as part of the consultation process.

4.3 Conclusions

As detailed above, the Bradley Court Convalescent Center property is recommended ineligible for listing in the NRHP or CRHR or for designation to the County of San Diego Historic Register, and therefore is not considered a historical resource as defined by CEQA. Based on these findings, Rincon recommends a finding of **no impact to historical resources**. Further, the CHRIS records search and a review of County of San Diego Historic Register failed to identify any other cultural resources, including historic districts, within close proximity to the project site.

5 Management Considerations

The SLF search for the project site was returned with positive results for Native American resources within the mapping quadrant and therefore are within a 1-mile radius of the project site. The records search for the project identified 21 previously conducted cultural resources studies within a 0.5-mile radius of the project site, of which one included the entire project site. The records search identified 16 previously recorded cultural resources within a 0.5-mile radius of the project site, none of which occur within the project site; however, one prehistoric site is recorded adjacent to the current project site, there is a known but undocumented milling feature immediately south of the project site. Furthermore, studies within the vicinity of the project site identify the areas a sensitive and recommend archaeological and Native American monitoring. Based on the number and type of artifacts and features recorded as part of the prehistoric resource, the proximity to a milling feature, and sensitivity of the vicinity, it is possible that intact cultural materials exist subsurface within the current project site. Additionally, the soils within the project site are alluvial and colluvial soils which are episodic sediments, and the sudden burial of artifacts is possible, increasing the likelihood of containing buried archaeological deposits (Waters 1992; Borejaza et al. 2014).

The pedestrian survey did not identify any new cultural resources within the project site. Previous disturbance associated with the construction of the existing buildings and parking was observed throughout the project site. Historical topographic map and aerial imagery review indicates that the project site was continuously developed from 1941 to 2000, including construction of the two extant buildings in 1960 (NETR Online 2021; USGS 2021).

Based on the above information, the project site is considered to have a moderate sensitivity for archaeological resources. Rincon recommends the following mitigation measures: implementation of an Archaeological and Tribal Monitoring Program. With adherence to these measures, project impacts would be less than significant. The project is also required to adhere to State regulations regarding the unanticipated discovery of human remains. The conditions below provides the details of the Archeological and Tribal Monitoring Program:

Archaeological Monitoring

PRE-CONSTRUCTION GRADING AND/OR IMPROVEMENTS: *(Prior to any clearing, grubbing, trenching, grading, or any land disturbances.)*

CULT#GR-1 - ARCHAEOLOGICAL MONITORING – PRECONSTRUCTION MEETING

INTENT: In order to comply with the County of San Diego Guidelines for Significance – Cultural Resources, an Archaeological Monitoring Program shall be implemented. **DESCRIPTION OF REQUIREMENT:** The County approved Project Archaeologist and Kumeyaay Native American Monitor shall attend the pre-construction meeting with the contractors to explain and coordinate the requirements of the archaeological monitoring program. The Project Archaeologist and Kumeyaay Native American Monitor shall monitor the original cutting of previously undisturbed deposits in all areas identified for development including off-site improvements. The Project Archaeologist and Kumeyaay Native American monitor shall also evaluate fill soils to determine that they are clean of cultural resources. The archaeological monitoring program shall comply with the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Cultural Resources. **DOCUMENTATION:** The applicant shall have the contracted Project Archeologist and Kumeyaay Native American attend the preconstruction meeting to explain the monitoring

requirements. **TIMING:** Prior to any clearing, grubbing, trenching, grading, or any land disturbances this condition shall be completed. **MONITORING:** The [DPW, PDCI] shall confirm the attendance of the approved Project Archaeologist.

DURING CONSTRUCTION: *(The following actions shall occur throughout the duration of the grading construction).*

CULT#GR-2 - ARCHAEOLOGICAL MONITORING – DURING CONSTRUCTION

INTENT: In order to comply with the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Cultural Resources, a Cultural Resource Grading Monitoring Program shall be implemented. **DESCRIPTION OF REQUIREMENT:** The Project Archaeologist and Kumeyaay Native American Monitor shall monitor the original cutting of previously undisturbed deposits in all areas identified for development including off-site improvements. The archaeological monitoring program shall comply with the following requirements during earth-disturbing activities:

- a. **Monitoring.** During the original cutting of previously undisturbed deposits, the Project Archaeologist and Kumeyaay Native American Monitor shall be onsite as determined necessary by the Project Archaeologist. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist in consultation with the Kumeyaay Native American Monitor. Monitoring of the cutting of previously disturbed deposits will be determined by the Project Archaeologist in consultation with the Kumeyaay Native American Monitor.
- b. **Inadvertent Discoveries.** In the event that previously unidentified potentially significant cultural resources are discovered:
 1. The Project Archaeologist or the Kumeyaay Native American monitor shall have the authority to divert or temporarily halt ground disturbance operations in the area of discovery to allow evaluation of potentially significant cultural resources.
 2. At the time of discovery, the Project Archaeologist shall contact the PDS Staff Archaeologist.
 3. The Project Archaeologist, in consultation with the PDS Staff Archaeologist and the Kumeyaay Native American Monitor, shall determine the significance of the discovered resources.
 4. Construction activities will be allowed to resume in the affected area only after the PDS Staff Archaeologist has concurred with the evaluation.
 5. Isolates and clearly non-significant deposits shall be minimally documented in the field. Should the isolates and/or non-significant deposits not be collected by the Project Archaeologist, then the Kumeyaay Native American monitor may collect the cultural material for transfer to a Tribal Curation facility or repatriation program.
 6. If cultural resources are determined to be significant, a Research Design and Data Recovery Program (Program) shall be prepared by the Project Archaeologist in consultation with the Kumeyaay Native American Monitor. The County Archaeologist shall review and approve the Program, which shall be carried out using professional

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archaeological methods. The Program shall include (1) reasonable efforts to preserve (avoidance) “unique” cultural resources or Sacred Sites; (2) the capping of identified Sacred Sites or unique cultural resources and placement of development over the cap, if avoidance is infeasible; and (3) data recovery for non-unique cultural resources. The preferred option is preservation (avoidance).

- c. **Human Remains.** If any human remains are discovered:
 - 1. The Property Owner or their representative shall contact the County Coroner and the PDS Staff Archaeologist.
 - 2. 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 offsite for evaluation, they shall be accompanied by the Kumeyaay Native American monitor.
 - 3. If the remains are determined to be of Native American origin, the NAHC shall immediately contact the Most Likely Descendant (MLD).
 - 4. 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 Public Resources Code Section 5097.98 has been conducted.
 - 5. The MLD may with the permission of the landowner, or their authorized representative, inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site.
 - 6. Public Resources Code §5097.98, CEQA §15064.5 and Health & Safety Code §7050.5 shall be followed in the event that human remains are discovered.
- d. **Fill Soils.** The Project Archaeologist and Kumeyaay Native American monitor shall evaluate fill soils to determine that they are clean of cultural resources.
- e. **Monthly Reporting.** The Project Archaeologist shall submit monthly status reports to the Director of Planning and Development Services starting from the date of the Notice to Proceed to termination of implementation of the archaeological monitoring program. The report shall briefly summarize all activities during the period and the status of progress on overall plan implementation. Upon completion of the implementation phase, a final report shall be submitted describing the plan compliance procedures and site conditions before and after construction.

DOCUMENTATION: The applicant shall implement the Archaeological Monitoring Program pursuant to this condition. **TIMING:** The following actions shall occur throughout the duration of the earth disturbing activities. **MONITORING:** The [DPW, PDCI] shall make sure that the Project Archeologist is on-site performing the monitoring duties of this condition. The [DPW, PDCI] shall contact the [PDS, PPD] if the Project Archeologist or applicant fails to comply with this condition.

ROUGH GRADING: *(Prior to rough grading approval and issuance of any building permit).*

CULT#GR-3 - ARCHAEOLOGICAL MONITORING – ROUGH GRADING

INTENT: In order to comply with the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Cultural Resources, an Archaeological Monitoring Program shall be implemented. **DESCRIPTION OF REQUIREMENT:** The Project Archaeologist shall prepare one of the following reports upon completion of the earth-disturbing activities that require monitoring:

- a. **No Archaeological Resources Encountered.** If no archaeological resources are encountered during earth-disturbing activities, then submit a final Negative Monitoring Report substantiating that earth-disturbing activities are completed and no cultural resources were encountered. Archaeological monitoring logs showing the date and time that the monitor was on site and any comments from the Native American Monitor must be included in the Negative Monitoring Report.
- b. **Archaeological Resources Encountered.** If archaeological resources were encountered during the earth disturbing activities, the Project Archaeologist shall provide an Archaeological Monitoring Report stating that the field monitoring activities have been completed, and that resources have been encountered. The report shall detail all cultural artifacts and deposits discovered during monitoring and the anticipated time schedule for completion of the curation and/or repatriation phase of the monitoring.

DOCUMENTATION: The applicant shall submit the Archaeological Monitoring Report to [PDS, PPD] for review and approval. Once approved, a final copy of the report shall be submitted to the South Coastal Information Center and any culturally-affiliated Tribe who requests a copy. **TIMING:** Upon completion of all earth-disturbing activities, and prior to Rough Grading Final Inspection (Grading Ordinance SEC 87.421.a.2), the report shall be completed. **MONITORING:** [PDS, PPD] shall review the report or field monitoring memo for compliance with the project MMRP, and inform [DPW, PDCI] that the requirement is completed.

FINAL GRADING RELEASE: *(Prior to any occupancy, final grading release, or use of the premises in reliance of this permit).*

CULT#GR-4 - ARCHAEOLOGICAL MONITORING – FINAL GRADING

INTENT: In order to comply with the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Cultural Resources, an Archaeological Monitoring Program shall be implemented. **DESCRIPTION OF REQUIREMENT:** The Project Archaeologist shall prepare a final report that documents the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program if cultural resources were encountered during earth-disturbing activities. The report shall include the following, if applicable:

- a. Department of Parks and Recreation Primary and Archaeological Site forms.
- b. Daily Monitoring Logs
- c. Evidence that all cultural materials have been conveyed as follows:
 - (1) Evidence that all prehistoric materials collected during the archaeological monitoring program have been submitted to a San Diego curation facility or a culturally affiliated Native American Tribal curation facility that meets federal standards per 36 CFR Part 79,

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and, therefore, would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records, including title, shall be transferred to the San Diego curation facility or culturally affiliated Native American Tribal curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility stating that the prehistoric archaeological materials have been received and that all fees have been paid.

or

Evidence that all prehistoric materials collected during the grading monitoring program have been repatriated to a Native American group of appropriate tribal affinity and shall be accompanied by payment of the fees necessary, if required. Evidence shall be in the form of a letter from the Native American tribe to whom the cultural resources have been repatriated identifying that the archaeological materials have been received.

- (2) Historic materials shall be curated at a San Diego curation facility and shall not be curated at a Tribal curation facility or repatriated. The collections and associated records, including title, shall be transferred to the San Diego curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility stating that the historic materials have been received and that all fees have been paid.
- d. If no cultural resources are discovered, a Negative Monitoring Report must be submitted stating that the archaeological monitoring activities have been completed. Grading Monitoring Logs must be submitted with the negative monitoring report.

DOCUMENTATION: The applicant's archaeologist shall prepare the final report and submit it to [PDS, PPD] for approval. Once approved, a final copy of the report shall be submitted to the South Coastal Information Center (SCIC) and any culturally-affiliated Tribe who requests a copy. **TIMING:** Prior to any occupancy, final grading release, or use of the premises in reliance of this permit, the final report shall be prepared. **MONITORING:** [PDS, PPD] shall review the final report for compliance with this condition and the report format guidelines. Upon acceptance of the report, [PDS, PPD] shall inform [PDS, LDR] and [DPW, PDCI], that the requirement is complete and the bond amount can be relinquished. If the monitoring was bonded separately, then [PDS, PPD] shall inform [PDS or DPW FISCAL] to release the bond back to the applicant.

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7 List of Prepares and Persons and Organizations Contacted

Rincon Senior Principal Investigator Ken Victorino, MA, Registered Professional Archaeologist (RPA) provided management oversight for this archaeological resources assessment. Mr. Victorino meets the Secretary of the Interior's Professional Qualifications Standards for prehistoric and historic archeology (National Park Service 1983). Senior Architectural Historian Steven Treffers, MHP provided project oversight. Rincon Architectural Historian Alexandra Madsen, MA, RPA conducted the records search, Sacred Lands File search, and is a co-author of this report. Rincon archaeologist Courtney Montgomery, MA, and Architectural Historian Ashley Losco, MSHP, are contributing authors of this report. Rincon archaeologist Rachel Bilchak conducted the pedestrian field survey and is also a contributing author of this report. Geographic Information Systems analysts Josh Patterson, MA and Audrey Brown prepared the figures for this report. Rincon Program Manager and Senior Archaeologist Breana Campbell-King, MA, RPA, as well as Principal and Senior Architectural Historian Shannon Carmack reviewed this report for quality control.

Rincon contacted the Native American Heritage Commission (NAHC) as part of the requirements for this report, to request a search of the Sacred Lands Files, which were returned with positive results. The NAHC recommended contacting the Baron Group of the Captain Grande, the Viejas Band of Kumeyaay Indians, and the Kumeyaay Cultural Repatriation Committee. Rincon did not conduct outreach for this project.

8 List of Recommended Mitigation Measures

Archaeological Monitoring

PRE-CONSTRUCTION GRADING AND/OR IMPROVEMENTS: *(Prior to any clearing, grubbing, trenching, grading, or any land disturbances.)*

CULT#GR-1 - ARCHAEOLOGICAL MONITORING – PRECONSTRUCTION MEETING

INTENT: In order to comply with the County of San Diego Guidelines for Significance – Cultural Resources, an Archaeological Monitoring Program shall be implemented. **DESCRIPTION OF REQUIREMENT:** The County approved Project Archaeologist and Kumeyaay Native American Monitor shall attend the pre-construction meeting with the contractors to explain and coordinate the requirements of the archaeological monitoring program. The Project Archaeologist and Kumeyaay Native American Monitor shall monitor the original cutting of previously undisturbed deposits in all areas identified for development including off-site improvements. The Project Archaeologist and Kumeyaay Native American monitor shall also evaluate fill soils to determine that they are clean of cultural resources. The archaeological monitoring program shall comply with the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Cultural Resources. **DOCUMENTATION:** The applicant shall have the contracted Project Archeologist and Kumeyaay Native American attend the preconstruction meeting to explain the monitoring requirements. **TIMING:** Prior to any clearing, grubbing, trenching, grading, or any land disturbances this condition shall be completed. **MONITORING:** The [DPW, PDCI] shall confirm the attendance of the approved Project Archaeologist.

DURING CONSTRUCTION: *(The following actions shall occur throughout the duration of the grading construction).*

CULT#GR-2 - ARCHAEOLOGICAL MONITORING – DURING CONSTRUCTION

INTENT: In order to comply with the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Cultural Resources, a Cultural Resource Grading Monitoring Program shall be implemented. **DESCRIPTION OF REQUIREMENT:** The Project Archaeologist and Kumeyaay Native American Monitor shall monitor the original cutting of previously undisturbed deposits in all areas identified for development including off-site improvements. The archaeological monitoring program shall comply with the following requirements during earth-disturbing activities:

- f. **Monitoring.** During the original cutting of previously undisturbed deposits, the Project Archaeologist and Kumeyaay Native American Monitor shall be onsite as determined necessary by the Project Archaeologist. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist in consultation with the Kumeyaay Native American Monitor. Monitoring of the cutting of previously disturbed deposits will be determined by the Project Archaeologist in consultation with the Kumeyaay Native American Monitor.

- g. **Inadvertent Discoveries.** In the event that previously unidentified potentially significant cultural resources are discovered:
7. The Project Archaeologist or the Kumeyaay Native American monitor shall have the authority to divert or temporarily halt ground disturbance operations in the area of discovery to allow evaluation of potentially significant cultural resources.
 8. At the time of discovery, the Project Archaeologist shall contact the PDS Staff Archaeologist.
 9. The Project Archaeologist, in consultation with the PDS Staff Archaeologist and the Kumeyaay Native American Monitor, shall determine the significance of the discovered resources.
 10. Construction activities will be allowed to resume in the affected area only after the PDS Staff Archaeologist has concurred with the evaluation.
 11. Isolates and clearly non-significant deposits shall be minimally documented in the field. Should the isolates and/or non-significant deposits not be collected by the Project Archaeologist, then the Kumeyaay Native American monitor may collect the cultural material for transfer to a Tribal Curation facility or repatriation program.
 12. If cultural resources are determined to be significant, a Research Design and Data Recovery Program (Program) shall be prepared by the Project Archaeologist in consultation with the Kumeyaay Native American Monitor. The County Archaeologist shall review and approve the Program, which shall be carried out using professional archaeological methods. The Program shall include (1) reasonable efforts to preserve (avoidance) "unique" cultural resources or Sacred Sites; (2) the capping of identified Sacred Sites or unique cultural resources and placement of development over the cap, if avoidance is infeasible; and (3) data recovery for non-unique cultural resources. The preferred option is preservation (avoidance).
- h. **Human Remains.** If any human remains are discovered:
1. The Property Owner or their representative shall contact the County Coroner and the PDS Staff Archaeologist.
 2. 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 offsite for evaluation, they shall be accompanied by the Kumeyaay Native American monitor.
 3. If the remains are determined to be of Native American origin, the NAHC shall immediately contact the Most Likely Descendant (MLD).
 4. 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 Public Resources Code Section 5097.98 has been conducted.
 5. The MLD may with the permission of the landowner, or their authorized representative, inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any

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associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site.

6. Public Resources Code §5097.98, CEQA §15064.5 and Health & Safety Code §7050.5 shall be followed in the event that human remains are discovered.
 - i. **Fill Soils.** The Project Archaeologist and Kumeyaay Native American monitor shall evaluate fill soils to determine that they are clean of cultural resources.
 - j. **Monthly Reporting.** The Project Archaeologist shall submit monthly status reports to the Director of Planning and Development Services starting from the date of the Notice to Proceed to termination of implementation of the archaeological monitoring program. The report shall briefly summarize all activities during the period and the status of progress on overall plan implementation. Upon completion of the implementation phase, a final report shall be submitted describing the plan compliance procedures and site conditions before and after construction.

DOCUMENTATION: The applicant shall implement the Archaeological Monitoring Program pursuant to this condition. **TIMING:** The following actions shall occur throughout the duration of the earth disturbing activities. **MONITORING:** The [DPW, PDCI] shall make sure that the Project Archeologist is on-site performing the monitoring duties of this condition. The [DPW, PDCI] shall contact the [PDS, PPD] if the Project Archeologist or applicant fails to comply with this condition.

ROUGH GRADING: *(Prior to rough grading approval and issuance of any building permit).*

CULT#GR-3 - ARCHAEOLOGICAL MONITORING – ROUGH GRADING

INTENT: In order to comply with the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Cultural Resources, an Archaeological Monitoring Program shall be implemented. **DESCRIPTION OF REQUIREMENT:** The Project Archaeologist shall prepare one of the following reports upon completion of the earth-disturbing activities that require monitoring:

- a. **No Archaeological Resources Encountered.** If no archaeological resources are encountered during earth-disturbing activities, then submit a final Negative Monitoring Report substantiating that earth-disturbing activities are completed and no cultural resources were encountered. Archaeological monitoring logs showing the date and time that the monitor was on site and any comments from the Native American Monitor must be included in the Negative Monitoring Report.
- b. **Archaeological Resources Encountered.** If archaeological resources were encountered during the earth disturbing activities, the Project Archaeologist shall provide an Archaeological Monitoring Report stating that the field monitoring activities have been completed, and that resources have been encountered. The report shall detail all cultural artifacts and deposits discovered during monitoring and the anticipated time schedule for completion of the curation and/or repatriation phase of the monitoring.

DOCUMENTATION: The applicant shall submit the Archaeological Monitoring Report to [PDS, PPD] for review and approval. Once approved, a final copy of the report shall be submitted to the South Coastal Information Center and any culturally-affiliated Tribe who requests a copy. **TIMING:** Upon completion of all earth-disturbing activities, and prior to Rough Grading Final Inspection (Grading

Ordinance SEC 87.421.a.2), the report shall be completed. **MONITORING:** [PDS, PPD] shall review the report or field monitoring memo for compliance with the project MMRP, and inform [DPW, PDCI] that the requirement is completed.

FINAL GRADING RELEASE: (Prior to any occupancy, final grading release, or use of the premises in reliance of this permit).

CULT#GR-4 - ARCHAEOLOGICAL MONITORING – FINAL GRADING

INTENT: In order to comply with the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Cultural Resources, an Archaeological Monitoring Program shall be implemented. **DESCRIPTION OF REQUIREMENT:** The Project Archaeologist shall prepare a final report that documents the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program if cultural resources were encountered during earth-disturbing activities. The report shall include the following, if applicable:

- a. Department of Parks and Recreation Primary and Archaeological Site forms.
- b. Daily Monitoring Logs
- c. Evidence that all cultural materials have been conveyed as follows:
 - (1) Evidence that all prehistoric materials collected during the archaeological monitoring program have been submitted to a San Diego curation facility or a culturally affiliated Native American Tribal curation facility that meets federal standards per 36 CFR Part 79, and, therefore, would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records, including title, shall be transferred to the San Diego curation facility or culturally affiliated Native American Tribal curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility stating that the prehistoric archaeological materials have been received and that all fees have been paid.

or

Evidence that all prehistoric materials collected during the grading monitoring program have been repatriated to a Native American group of appropriate tribal affinity and shall be accompanied by payment of the fees necessary, if required. Evidence shall be in the form of a letter from the Native American tribe to whom the cultural resources have been repatriated identifying that the archaeological materials have been received.

- (2) Historic materials shall be curated at a San Diego curation facility and shall not be curated at a Tribal curation facility or repatriated. The collections and associated records, including title, shall be transferred to the San Diego curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility stating that the historic materials have been received and that all fees have been paid.

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- d. If no cultural resources are discovered, a Negative Monitoring Report must be submitted stating that the archaeological monitoring activities have been completed. Grading Monitoring Logs must be submitted with the negative monitoring report.

DOCUMENTATION: The applicant's archaeologist shall prepare the final report and submit it to [PDS, PPD] for approval. Once approved, a final copy of the report shall be submitted to the South Coastal Information Center (SCIC) and any culturally-affiliated Tribe who requests a copy. **TIMING:** Prior to any occupancy, final grading release, or use of the premises in reliance of this permit, the final report shall be prepared. **MONITORING:** [PDS, PPD] shall review the final report for compliance with this condition and the report format guidelines. Upon acceptance of the report, [PDS, PPD] shall inform [PDS, LDR] and [DPW, PDCI], that the requirement is complete and the bond amount can be relinquished. If the monitoring was bonded separately, then [PDS, PPD] shall inform [PDS or DPW FISCAL] to release the bond back to the applicant.

Appendix A

Records Search Summary

Appendix B

Native American Heritage Commission Sacred Land File Results