CULTURAL RESOURCE SURVEY OF THE PALA MESA PLAZA PROJECT, 3233 OLD HIGHWAY 395, FALLBROOK, SAN DIEGO COUNTY, CALIFORNIA (PDS2020-STP-20-021)

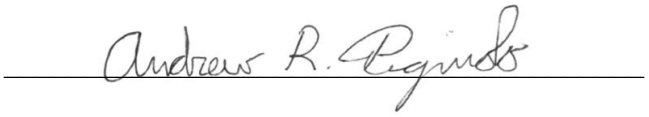
Project Name:
Fallbrook Commercial

Lead Agency:

County of San Diego
Department of Planning and Land Use
Contact: Bradley Sonnenburg
5510 Overland Avenue
San Diego, CA 92123
(858) 694-2960

Preparer:

Andrew R. Pigniolo, RPA
Laguna Mountain Environmental, Inc.
3421 Voltaire Street
San Diego, CA 92106
(858) 505-8164



Project Proponent:

Mr. Rafid Hamika
370 Bridgeton Cross Court
Las Vegas, NV 89148

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NATIONAL ARCHAEOLOGICAL DATA BASE INFORMATION

Authors:	Andrew R. Pigniolo
Firm:	Laguna Mountain Environmental, Inc.
Client/Project Proponent:	Mr. Rafid Hamika
Report Date:	September 2021
Report Title:	Cultural Resource Survey of the Pala Mesa Plaza Project, 3233 Old Highway 395, Fallbrook, San Diego County, California
Type of Study:	Cultural Resource Survey
New Sites:	None
Updated Sites:	None
USGS Quadrangle:	Bonsall Quadrangle 7.5'
Acreage:	4.37 Acres
Permit Numbers:	PDS2020-STP-20-021
Key Words:	County of San Diego, Fallbrook, 3233 Old Highway 395, Negative Survey

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LIST OF ACRONYMS AND ABBREVIATIONS

APE (Area of Potential Effects)
ARMR (Archaeological Resource Management Report)
CA (California)
California Register (California Register of Historic Resources)
CEQA (California Environmental Quality Act)
cm (centimeter)
CRM (Cultural Resource Management)
EIR (Environmental Impact Report)
ft. (feet)
Laguna Mountain (Laguna Mountain Environmental, Inc.)
Local Register (San Diego County Local Register of Historic Resources)
m (meter)
MOU (Memorandum of Understanding)
MUP (Major Use Permit)
NEPA (National Environmental Policy Act)
NHPA (National Historic Preservation Act)
RPO (Resource Protection Ordinance)
SCIC (South Coastal Information Center)
SDI (San Diego County; site number prefix)

EXECUTIVE SUMMARY

Laguna Mountain Environmental, Inc. (Laguna Mountain) conducted an archaeological survey of the 4.37-acre Pala Mesa Plaza Project for a proposed commercial development. The project is located in the Fallbrook area of San Diego County and includes the addition of commercial retail buildings to an existing commercial area. The archaeological investigation included a records search, literature review, examination of historic maps and previous studies, archival research, and archaeological field survey of the property.

Cultural resource work was conducted in accordance with the California Environmental Quality Act (CEQA), the County Resource Protection Ordinance (RPO), and the County of San Diego guidelines. The County of San Diego served as lead agency for the project and CEQA compliance.

A records search performed at the South Coastal Information Center indicated that at least a portion of the project area has been part of six previous surveys, but none of these investigations were intensive over the current project parcel. At least 64 archaeological investigations have been previously documented in the vicinity of the project, and 21 cultural resources have been identified through previous research within a one-mile radius of the project. Sites in the project vicinity include 11 prehistoric and 10 historic resources.

The survey of the project area was conducted on December 18, 2020 by Mr. Andrew R. Pigniolo, RPA. Ms. Aleshanee Ventura from Saving Sacred Sites served as Native American monitor during the survey. The property was generally open and the entire parcel was surveyed using 10 to 15 m transect intervals. Surface visibility was moderate, averaging approximately 60 percent throughout the project area. Some portions include existing buildings and hardscape parking lots and visibility was limited to areas of landscaping in these portions of the project. The remainder of the area was very open with approximately 95 percent surface visibility. The cultural resources survey of the project adequately served to identify cultural resources.

No cultural resources were identified during the survey. Photographs and project records for this inventory will be curated at Laguna Mountain.

Due to the extensive amount of previous cut and grading activity, the potential for buried cultural resources is very low to non-existent. The project will result in no effects to cultural resources. No mitigation measures are recommended for this project.

1.0 INTRODUCTION

1.1 Project Description

1.1.1 Project Summary

The proposed project is located in the Fallbrook area in the northwestern portion of San Diego County (Figure 1). The project area is located at 3233 Old Highway 395, immediately east of Interstate 15 where it intersects with Highway 76, and on the east side of Via Todo Santos and south of Via Belmonte. It is located in an unsectioned portion of Township 10 South, Range 1 East. The project is limited to the 0.25-acre proposed project area (APN 125-050-54) and no off-site improvements are proposed. The project area is shown on the Bonsall USGS 7.5' Quadrangle (Figure 2). The proposed project involves the addition of commercial retail buildings to an existing commercial area (Figure 3).

The cultural resource survey was conducted pursuant to the California Environmental Quality Act (CEQA), the County Resource Protection Ordinance (RPO), and County of San Diego guidelines. The County of San Diego served as lead agency for CEQA compliance. The cultural resource survey was conducted to determine if any cultural resources eligible for inclusion in the California Register of Historic Resources (California Register) could be affected by this project.

1.1.2 Project Personnel

The cultural resource inventory was conducted by Laguna Mountain Environmental, Inc. (Laguna Mountain), whose cultural resources staff meets state and local requirements. Mr. Andrew R. Pigniolo served as Principal Investigator for the project. Mr. Pigniolo is on the County of San Diego's list of qualified archaeologists and meets the Secretary of the Interior's standards for qualified archaeologists. Mr. Pigniolo has an M.A. degree in Anthropology from San Diego State University and has more than 41 years of experience in the San Diego region. His resume is included in Appendix A.

Ms. Carol Serr served as Associate Archaeologist for the project assisting with the record search, graphics preparation, and report editing. Ms. Serr has a B.A. degree in Anthropology from San Diego State University and more than 41 years experience in archaeology of San Diego County.

Ms. Aleshanee Ventura, of Saving Sacred Sites, served as Native American monitor for the project. Ms. Ventura has more than two years experience in local archaeological monitoring.

Figure 1 Regional Location

Figure 2 Project Location Map

Figure 3. Project Plan

1.1.3 Structure of the Report

This report follows the County of San Diego Report Format and Content Requirements for cultural resources, which is a modified version of the Archaeological Resource Management Report (ARMR) Guidelines. The report introduction provides a description of the project and background on the project area, as well as any previous research. Section 2.0 describes the guidelines for determining archaeological significance. Section 3.0 describes the survey methods and results. Section 4.0 provides the interpretation of any identified resources and impacts to those resources, and Section 5.0 includes a discussion of mitigation measures and recommendations for the project.

1.2 Existing Conditions

The following environmental and cultural background provides a context for the cultural resource inventory.

1.2.1 Environmental Setting

The project is located in the northwestern portion of San Diego County in the eastern Fallbrook area. The project area includes an east trending gentle valley slope that has been leveled in the past. The property is largely developed with existing commercial buildings and the associated parking lot, but open areas are present in the northern and southern sections of the project area. Elevation onsite ranges from approximately 300 to 340 feet above mean sea level.

Current land use in the project vicinity consists of mixed commercial and residential. Within the project area, the existing commercial structures and parking lots are in current use. Most of the area has been disturbed by past agricultural uses and leveling.

The geomorphology of the project area is largely a product of the region's geologic history. During the Jurassic and late Cretaceous (>100 million years ago) a series of volcanic islands paralleled the current coastline in the San Diego region. This island arc of volcanos spewed out vast layers of tuff (volcanic ash) and breccia that have since been metamorphosed into hard rock of the Santiago Peak Volcanic formation. These fine-grained rocks provided a regionally important resource for Native American flaked stone tools.

At about the same time, a granitic and gabbroic batholith was being formed under and east of these volcanoes. This batholith was uplifted and forms the granitic rocks and outcrops of the Peninsular Range and the foothills around the project area. During the emplacement of the batholith surrounding rocks were metamorphosed. These rocks are overlain throughout most of the project area by alluvium. Outcrops of metamorphic rock, were present only at the high point of the knoll within the project area. Although somewhat soft these metamorphic rocks provided particularly good abrasive surfaces for Native American seed processing. The batholith contains numerous pegmatite dikes. This was a good source of quartz, a material used by Native Americans for flaked stone tools and ceremonial purposes.

The project area itself is underlain by late to middle Pleistocene undivided Old alluvial flood plain deposits (Kennedy and Tan 2005). These consist of fluvial sediments deposited on canyon floors that are moderately well consolidated, poorly sorted, permeable, commonly slightly dissected gravel, sand, silt, and clay-bearing alluvium. (Kennedy and Tan 2005).

Ramona sandy loam is present throughout the majority of the project area (Bowman 1973). Ramona series soils consist of well-drained, very deep sandy loams that have a sandy clay loam subsoil. These soils formed in granitic alluvium. They are on terraces and alluvial fans. In a representative profile surface layer is yellowish-brown and brown, slightly acid and medium acid sandy loam about 17 inches thick. The subsoil is brown and yellowish-brown slightly acid and neutral sandy clay loam about 43 inches thick. Below this is yellowish-brown, neutral light coarse sandy clay loam. In some areas this soil is gravelly throughout the profile (Bowman 1973).

The far western fill and cut slope portion of the project is underlain by Greenfield sandy loam (Bowman 1973). Greenfield series soils consist of well-drained, very deep sandy loams derived from granitic alluvium (Bowman 1973). These soils are on alluvial fans and alluvial plains. In a representative profile the surface layer is brown, slightly acid sandy loam about 6 inches thick. The subsoil is yellowish-brown and light yellowish-brown, slightly acid sandy loam about 28 inches thick. The substratum is light yellowish-brown, neutral loamy coarse sand. It extends to a depth of more than 60 inches (Bowman 1973).

The San Luis Rey River is located less than 1 mile south of the project and would have provided a regular water source for Native Americans using the area.

The climate of the region can generally be described as Mediterranean, with cool wet winters and hot dry summers. Rainfall limits vegetation growth. One vegetation community, adapted to the dry conditions of the area, probably occurred in the project area. The area is currently disturbed, but elements of coastal sage scrub vegetation were likely present in the past. Components of this community provided important resources to Native Americans in the region. Sage seed, yucca, buckwheat, acorns, and native grasses formed important food resources to Late Prehistoric Native Americans.

Animal resources in the region prior to development of the area included deer, fox, raccoon, skunk, bobcats, coyotes, rabbits, and various rodent, reptile, and bird species. Small game, dominated by rabbits, is relatively abundant.

1.2.2 Cultural Setting

Prehistoric Period

Paleoindian Period

The earliest well documented prehistoric sites in southern California are identified as belonging to the Paleoindian period, which has locally been termed the San Dieguito complex/tradition. The Paleoindian period is thought to have occurred between 9,000 years ago, or earlier, and 8,000 years ago in this region. Although varying from the well-defined fluted point complexes such as clovis, the San Dieguito complex is still seen as a hunting focused economy with limited use of seed grinding technology. The economy is generally seen to focus on highly ranked resources such as large mammals and relatively high mobility which may be related to following large game. Archaeological evidence associated with this period has been found around inland dry lakes, on old terrace deposits of the California desert, and also near the coast where it was first documented at the Harris Site.

Archaic Period

Native Americans during the Archaic period had a generalized economy that focused on hunting and gathering. In many parts of North America, Native Americans chose to replace this economy with types based on horticulture and agriculture. Coastal southern California economies remained largely based on wild resource use until European contact (Willey and Phillips 1958). Changes in hunting technology and other important elements of material culture have created two distinct subdivisions within the Archaic period in southern California.

The Early Archaic period is differentiated from the earlier Paleoindian period by a shift to a more generalized economy and an increased focus on the use of grinding and seed processing technology. At sites dated between approximately 8,000 and 1,500 years before present, the increased use of groundstone artifacts and atlatl dart points, along with a mixed core-based tool assemblage, identify a range of adaptations to a more diversified set of plant and animal resources. Variations of the Pinto and Elko series projectile points, large bifaces, manos and portable metates, core tools, and heavy use of marine invertebrates in coastal areas are characteristic of this period, but many coastal sites show limited use of diagnostic atlatl points. Major changes in technology within this relatively long chronological unit appear limited. Several scientists have considered changes in projectile point styles and artifact frequencies within the Early Archaic period to be indicative of population movements or units of cultural change (Moratto 1984), but these units are poorly defined locally due to poor site preservation.

Late Prehistoric Period

Around 2,000 BP dramatic cultural changes occurred. An intrusion of Shoshonean-speakers into the northern part of San Diego County occurred around 1,500 BP. The Late Prehistoric period in San Diego County is recognized archaeologically by smaller projectile points, the replacement of flexed inhumations with cremation, the introduction of ceramics and an emphasis on inland plant food collection and processing, especially acorns. Inland semi-sedentary villages were established along major water courses, and montane areas were seasonally occupied to exploit acorns and piñon nuts, resulting in permanent milling stations on bedrock outcrops. Mortars for acorn processing increased in frequency relative to seed-grinding basins.

This period is known archaeologically in the southern part of San Diego County as the Yuman (Rogers 1945) or the Cuyamaca Complex (True 1970). In the northern part of the county, where the project is located, the period is known as the San Luis Rey Complex (True et. al. 1974).

The San Luis Rey Complex is divided into two phases. San Luis Rey I is a pre-ceramic phase dating from approximately 2,000 BP to 500 BP (True et al. 1974). The material culture of this phase includes small triangular pressure flaked projectile points, manos, portable metates, olivella beads, drilled stone ornaments, and mortars and pestles. The San Luis Rey II phase differs only in the addition of ceramics and pictographs. Dates for the introduction of ceramics have not been satisfactorily documented.

The Shoshonean inhabitants of northern San Diego County were called Luiseños by Franciscan friars who named the San Luis Rey River and established the San Luis Rey Mission in the heart of Luiseño territory. Their territory encompassed an area from roughly Agua Hedionda on the coast, east to Lake Henshaw, north into Riverside County, and west through San Juan Capistrano to the coast (Bean and Shipek 1978).

The Luiseño shared boundaries with the Gabrieliño and Serrano to the west and northwest, the Cahuilla from the deserts to the east, the Cupeño to the southeast and the Ipai, to the south. All but the Ipai are linguistically similar to the Luiseño, belonging to the Takic subfamily of Uto-Aztecan (Bean and Shipek 1978). The Yuman Ipai have a different language and cultural background but shared certain similarities in social structure, and some Ipai incorporated some Luiseño religious practices.

The Luiseño were divided into several autonomous lineages or kin groups. The lineage represented the basic political unit among most southern California Indians. According to Bean and Shipek (1978) each Luiseño lineage possessed a permanent base camp, or village, in the San Luis Rey Valley and another in the mountain region for the exploitation of acorns, although this mobility pattern may only apply to the ethnohistoric present. Nearly all resources of the environment were exploited by the Luiseño in a highly developed seasonal mobility system. Each lineage had exclusive hunting and gathering rights in their procurement ranges and violation of trespass was seriously punished (Bean and Shipek 1978).

Acorns were the most important single food source used by the Luiseño. Their villages were usually located near water necessary for leaching acorn meal. Seeds from grasses, manzanita, sage, sunflowers, lemonade berry, chia and other plants were also used along with various wild greens and fruits. Deer, small game and birds were hunted and fish and marine foods were eaten. Generally women collected the plant resources and the men hunted, but there was no rigid sexual division of labor (Bean and Shipek 1978).

Houses were arranged in the village without apparent pattern. The houses in primary villages were conical structures covered with Tule bundles, having excavated floors and central hearths. Houses constructed at the mountain camps generally lacked any excavation, probably due to the summer occupation. Other structures included sweathouses, ceremonial enclosures, ramadas and acorn granaries. Domestic implements included wooden utensils, baskets and ceramic cooking and storage vessels.

Hunting implements consisted of the bow and arrow, curved throwing sticks, nets and snares. Shell and bone hooks as well as nets were used for fishing. Lithic resources of quartz and metavolcanics, and some cherts were available locally in some areas. Exotic materials, such as obsidian and steatite, were acquired through trade.

The traditional Luiseño religion is a complex and deeply philosophical belief system with powerful religious leaders, elaborate ceremonies and a veil of secrecy (White 1963). Each ritual and ceremonial specialist maintained the knowledge of the full meaning of a ceremony in secrecy and passed on the knowledge to only one heir. The decimation of the population after European contact undoubtedly caused the loss of some religious specialists and brought about abbreviated versions of ceremonies (Winterrowd and Shipek 1986), many of which are still practiced today. Surviving ceremonies include initiation for cult candidates, installation of religious chiefs, funerals and clothes burning (Bean and Shipek 1978).

Ethnohistoric Period

The Ethnohistoric period refers to a brief period when Native American culture was initially being affected by Euroamerican culture and historical records on Native American activities were limited. Spanish explorers first encountered coastal Luiseño villages in 1769 and later established the Mission San Luis Rey de Francia in 1798, four miles inland from the mouth of the river. The missions "recruited" the Luiseño to use as laborers and convert them to Catholicism. The inland Luiseño were not heavily affected by Spanish influence until 1816, when an outpost of the mission was established 20 miles further inland, at Pala (Sparkman 1908).

At the time of contact, Luiseño population estimates range from 5,000 to as many as 10,000 individuals. Missionization, along with the introduction of European diseases, greatly reduced the Luiseño population. Most villagers, however, continued to maintain many of their aboriginal customs and simply adopted the agricultural and animal husbandry practices learned from Spaniards.

By the early 1820s California came under Mexico's rule, and in 1834 the missions were secularized resulting in political imbalance which caused Indian uprisings against the Mexican rancheros. Many of the Luiseño left the missions and ranchos and returned to their original village settlements.

When California became a sovereign state in 1849, the Luiseño were recruited more heavily as laborers and experienced even harsher treatment. Conflicts between Indians and encroaching Anglos finally led to the establishment of reservations for some Luiseño populations, including the La Jolla Reservation in 1875. Other Luiseño were displaced from their homes, moving to nearby towns or ranches. The reservation system interrupted Luiseño social organization and settlement patterns, yet many aspects of the original Luiseño culture still persist today. Certain rituals and religious practices are maintained and traditional games, songs and dances continue as well as the use of foods such as acorns, yucca and wild game.

Historic Period

Cultural activities within San Diego County between the late 1700s and the present provide a record of Native American, Spanish, Mexican, and American control, occupation, and land use. An abbreviated history of San Diego County is presented for the purpose of providing a background on the presence, chronological significance, and historical relationship of cultural resources within the county.

Native American control of the southern California region ended in the political views of western nations with Spanish colonization of the area beginning in 1769. De facto Native American control of the majority of the population of California did not end until several decades later. In southern California, Euroamerican control was firmly established by the end of the Garra uprising in the early 1850s (Phillips 1975).

The Spanish Period (1769-1821) represents a period of Euroamerican exploration and settlement. Dual military and religious contingents established the San Diego Presidio and the San Diego and San Luis Rey Missions. The Mission system used Native Americans to build a footing for greater European settlement. The Mission system also introduced horses, cattle, other agricultural goods and implements; and provided construction methods and new architectural styles. The cultural and institutional systems established by the Spanish continued beyond the year 1821, when California came under Mexican rule.

The Mexican Period (1821-1848) includes the retention of many Spanish institutions and laws. The mission system was secularized in 1834, which dispossessed many Native Americans and increased Mexican settlement. After secularization, large tracts of land were granted to individuals and families and the rancho system was established. Cattle ranching dominated other agricultural activities and the development of the hide and tallow trade with the United States increased during the early part of this period. The Pueblo of San Diego was established during this period and Native American influence and control greatly declined. The Mexican Period ended when Mexico ceded California to the United States after the Mexican-American War of 1846-48.

Soon after American control was established (1848-present), gold was discovered in California. The tremendous influx of American and Europeans that resulted quickly drowned out much of the Spanish and Mexican cultural influences and eliminated the last vestiges of de facto Native American control. Few Mexican ranchos remained intact because of land claim disputes and the homestead system increased American settlement beyond the coastal plain.

1.2.3 Record Search Results

The archaeological inventory includes archival and other background studies in addition to Laguna Mountain's field survey of the project area. The archival research consisted of literature and record searches at local archaeological repositories, in addition to an examination of historic maps, and historic site inventories. This information was used to identify previously recorded resources and determine the types of resources that might occur in the survey area. The methods and results of the archival research are described below.

The records and literature search for the project was conducted at the South Coastal Information Center (SCIC) at San Diego State University. The records search included a one-mile radius of the project area to provide background on the types of sites that would be expected in the region (Appendix B). Copies of historic maps were provided by the South Coastal Information Center.

At least 64 archaeological investigations have been previously documented in the vicinity of the project. Six of these covered at least a portion of the project area, but none of these investigations were intensive examinations of the area. These studies indicate there was a moderate amount of prehistoric activity in the area, but none has been recorded on the property. Table 1 summarizes the investigations within the one-mile radius.

Table 1. Archaeological Investigations within One Mile of the Project Area

Author(s)	Report Title	Year
Bonner and Taniguchi	Record Search and Site Visit Results for Cingular Telecommunications Facility Candidate SD947-04 (Leatherbury), 3701 Pala Mesa Drive, Fallbrook	2004
Bradford	Palomar Community College North Education Center Continuing Consultation	2012
Bull	Archaeological Resources of Lake Rancho Viejo	1981
Caltrans	Archaeological Survey Report for a Proposed Truck Weigh Station on Northbound I-15 11-SD-15 PMR 46.1 - R46.7	1982
Caltrans	Historic Property Survey 11-SD-76 P.M.16.0/16.4	1987
Caltrans	Negative Archaeological Survey Report: 11-SD-76 P.M. 17.8, 11-SD-76 P.M. 18.5, 11-SD-76 P.M. 19.15	1994
Case	Phase I Cultural Resources Pedestrian Survey for the Lower San Luis Rey River Valley Groundwater Storage and Recovery Program, San Diego County	2002
Castells et al.	Cultural Resource Survey Report for the San Diego Gas & Electric Company and Southern California Gas Company Pipeline Safety & Reliability Project, San Diego County	2016
Chmiel	Letter Report: ETS 29493: Cultural Resources Survey For Retire from Service Pole P517172, Fallbrook, San Diego County	2015
Clowery	ETS #22379, Cultural Resources Survey for the Restoration for Tl 698 Around Z219410, Horse Creek, Pala Project, San Diego County	2012
Cook	Cultural Resource Inventory Palomar Aggregates EIR Appendix C	1990
Corum	An Archaeological Survey Report for the Proposed Interstate 15/Route 76 Interchange (11-SD-15/76, P.M. 46.3-48.1/16.8-17.7) 11203-095091	1977
Cox	Letter Report: ETS 32422 - Cultural Resources Survey Report for Firm C1234 Section A Reconductor Project, Valley Center, San Diego County, IO 7071280	2017
Cox	Letter Report: ETS 32423 - Cultural Resources Survey Report for Firm C1234 Section B Reconductor Project, Fallbrook, San Diego County, IO 7071280	2017
Davis	Indirect Visual Impact Assessment Survey for the Proposed Pipeline Safety and Reliability Project, San Diego County	2016
Duke	Cultural Resource Assessment Cingular Wireless Facility No. SD113-02, Fallbrook, San Diego County	2003
EDAW	State Route 76 Corridor- SR-76 Highway Improvement Project Historic Property Survey Report	2009
Erickson	ETS #23630, Cultural Resources Monitoring for the Palomar College Reconductor, 5 Pole Project, San Diego County	2013
Erickson	ETS #24222, Addendum Cultural Resources Monitoring for the College North, Overhead Conversion Project, San Diego County	2013
Hale	Workplan for Archaeological Data Recovery for the Palomar North Project, San Diego County	2012
Hatley	Supplemental Environmental Information - Pala Mesa Units C, D, & E	1978
Hector et al.	Cultural Resources Survey, Archaeological Testing, and Historic Building Evaluation for the Proposed Meadowood Project, San Diego County	2006
Jordan et al.	Archaeological Survey Report for the Realignment of State Route 76, San Diego County	2006
Jordan et al.	Cultural Resources Study for the County of San Diego Department of Parks and Recreation San Luis Rey River Park - Middle Right of Way Trail, Bonsall Community Park Development, and Rio Prado Park Development Projects, Pala, Bonsall and Pala Mesa, San Diego	2019
Kasper and Crotteau	Archaeological Phase I Survey Report for Proposed Rock Outcrop Removal on 11-SD-76 (P.M. 18.25, 18.7, 19.15, 20.25) 11212-185021	1981
Laylander and Ni Ghabhlain	Monitoring, Discovery and Historic Properties Treatment Plan for the Palomar Community College North Education Center, San Diego County	2011
Manchen and Williams	Supplemental Archaeological Survey for the Minor Project Refinements: Certificate of Public Convenience and Necessity for the Rainbow-San Diego (Line 3602) 36-inch Natural Gas Pipeline Project, San Diego County	2017
McGinnis	Cultural Resources Survey and Testing Report for the Palomar Community College North Education Center, Fallbrook	2007
Metropolitan Water Dist. of Southern California	San Diego Pipeline No. 6 Project Environmental Planning Technical Report Cultural and Ethnographic Resources	1992

Table 1. Archaeological Investigations within One Mile of the Project Area
(Continued)

Author(s)	Report Title	Year
Ni Ghabhlain et al.	Archaeological Survey Report for the San Luis Rey River Park, San Diego County	2011
RECON	Draft Environmental Impact Report for Dulin Ranch Specific Plan	1977
RECON	Supplemental Environmental Information for Pala Mesa Units C, D, and E	1978
RECON	Draft Environmental Impact Report for Lake Rancho Viejo	1981
RECON	Draft Environmental Impact Report for Campus Park Specific Plan	1982
RECON	Draft Environmental Impact Report for the Lake Rancho Viejo Specific Plan	1984
RECON	Draft Environmental Impact Report for the Meadowood Project, Fallbrook Community Plan Area, San Diego County	2005
Rosen	Archaeological Survey Report for a Proposed Truck Weigh Station on Northbound I-15, 11-SD-15, P.M. R 46.1/ R46.7, 11203-910075-5957015	1982
Rosen	Report of an Archaeological Survey on State Route 76	1985
Rosen	Report of an Archaeological Survey on State Route 76 11-SD-76 P.M. 12.4/16.8 11209-116740	1985
Rosen	Negative Archaeological Survey - 4-lane Expressway, City of Oceanside	1991
Rosen and Crafts	Negative Archaeological Survey Report Negative Findings 11-SD-76, P.M. 17.8, 11234-055301, 11-SD-76, P.M. 18.5, 11273-056701, 11-SD-76, P.M. 19.15, 11273-056601	1994
Rosenthal et al.	Archaeological Survey of the Proposed Hard Rock Mining Site, San Diego County	1987
Roy	Letter Report: ETS 31859 - Cultural Resources Monitoring Report for Replacement Activities for Pole P319681, Community of Fallbrook, San Diego County, IO 7074264	2015
Shalom	Cultural Resources Survey for the San Luis Rey River Park Master Plan San Diego	2006
Sikes and Arrington	Cultural Resources Inventory Pala Gateway Project, San Diego County	2009
Smith	Cultural Resource Study at Sites CA-SDI-684 and CA-SDI-9854	1990
Tennesen	ETS #24222, Cultural Resources Monitoring for the College North, Overhead Conversion Project, San Diego County	2013
Tsunoda	Revised - Third Supplemental Historic Property Survey Report (HPSR): State Route (SR) 76 Widening Project Between South Mission Road and Interstate 15	2013
Tsunoda	Third Supplemental Historic Property Survey Report (HPSR): State Route (SR) 76 Widening Project Between South Mission Road and Interstate 15	2013
Wade	Cultural Resource Survey Campus Park Project	2009
Wade	Cultural Resource Record Search and Survey (2004) and Updates (2012) Campus Park West (Pappas Property) Fallbrook	2012
Wade	Archaeological Survey and Assessment for Prehistoric Resources Located on the Horse Creek Ridge Property, County of San Diego	2013
Wade	Campus Park/Dr Horton Property: Archaeological Re-survey	2013
Wade	Addendum to Archaeological Survey and Assessment for Prehistoric Resources Located on the Horse Creek Ridge Property	2016
Wade and Van Wormer	Archaeological Survey and Assessment for Historical Resources Located on the Horse Creek Ridge Property, County of San Diego	2013
WESTEC	Draft Environmental Impact Report for Sycamore Springs Specific Plan, Tentative Map and Use Permit	1980
Whitehouse and Cheever	Cultural Resource Constraints Study of the Pankey Ranch Property County of San Diego	1990
Wills	Cultural Resources Records Search and Site Visit Results for TMobile West, LLC Candidate SD02113A (Quality Inn Fallbrook) 3135 Old Highway 395, Fallbrook, San Diego County	2015
Wright	Cultural Resources Negative Survey Report for: The Murray Davidson Subdivision TM 5398	2004
Wright	Cultural Resources Negative Survey Report For: TPM 20841, Log No. 04-02-024 - Bridge Pac Minor Subdivision APN 125-070-075, Negative Findings	2004
Wright	Cultural Resources Negative Survey Report For: TPM 20874, Log No. 04-02-043 - Berezousky Minor Subdivision	2004
Wright	Cultural Resources Survey Report for TPM 20936 Log 05-02-016 Fernandez Minor Subdivision APN 125-220-11	2005
Wright	Cultural Resources Survey Report for: TPM 21076,Log No. 07-02-011, the Sumac Road Project, APN 125-030-45-00 - Negative Findings	2008
Zepeda-Herman	Cultural Resources Monitoring Report Meadowood Project Settlement Agreement Phase	2013

Twenty-one cultural resources have been identified through previous research within one mile of the project area. These cultural resources are summarized on Table 2. These resources consist of 11 prehistoric sites and 10 historic resources. The prehistoric sites include a village site and three other locations with habitation debris, all also associated with bedrock milling. A lithic scatter and five isolate artifacts have also been recorded. The historic resources include the Rancho Monserate, water conveyance features, a residence, remains of adobe walls with associated refuse, and a bench mark monument.

Table 2. Recorded Cultural Resources within One Mile of Project Area

Resource No.		Resource Type	Recorder (Year)
P-37-00682	CA-SDI-0682	Village Site with Milling	True (1960); Kasper (1981); Zepeda-Herman (2013); Sharlotta (2014); Wade & James (2017)
P-37-00684	CA-SDI-0684	Habitation Site with Milling	True (1960)
P-37-01285	CA-SDI-1285	Lithic Scatter	Kearns (1971)
P-37-09854	CA-SDI-9854	"Temporary Camp with Milling"	Cottrell (1984)
P-37-010861	CA-SDI-10861	Temporary Camp with Milling	Cook (1987)
P-37-012207	CA-SDI-12207	Historic Adobe Walls and Refuse	Wells & Snyder (1991); Bowden-Renna (2006)
P-37-014886	—	Isolate Ground Sherd	Cook (1987)
P-37-025446	CA-SDI-16890	Historic Rancho Monserate	Andrews et al. (2003); Wade (2012); Shultz et al. (2015)
P-37-028133	—	Historic Concrete Reservoir Structure	Dolan (2006)
P-37-031756	CA-SDI-20172	Historic Concrete Standpipes	Gunderman (2011)
P-37-033557	—	Historic Highway 395	Stringe-Bowsher (2018)
P-37-035187	—	Isolate Flake	Wade (2015)
P-37-035254	—	Historic Sign on Boulder	Shultz et al. (2015)
P-37-035257	—	Historic Bench Mark Monument	Shultz et al. (2015)
P-37-035849	—	Historic Residence	Meiser (2008)
P-37-036301	—	Isolate Flake	Yerka et al. (2016)
P-37-036389	—	Isolate Historic Ceramic Item	Briggs & Wade (2017)
P-37-036431	—	Isolate Metate	James & Wade (2017)
P-37-036438	—	Isolate Metate	James & Wade (2017)
P-37-036440	—	Bedrock Milling	James & Wade (2017)
P-37-037048	CA-SDI-22270	Historic Aqueduct Pipeline	Cooley & Ramos-Ponciano (2018)

Historic research included an examination of a variety of resources. The current listings of the National Register of Historic Places were checked through the National Register of Historic Places website. The California Inventory of Historic Resources (State of California 1976) and the California Historical Landmarks (State of California 1992) were also checked for historic resources. Historic map research indicated that historic structures were not present in the project area. A 1953 aerial photograph of the area shows it as plowed agricultural land sloping gently eastward (NETR 1953). The 1964 aerial shows the grading for the development to the west and the elevation of the road on the western side of the project area through terraced fill. The project area itself is still sloping (NETR 1964). Conditions were the same in 1967, but by the 1984 aerial the construction of Interstate 15 to the east resulted in dramatic changes. The area appears to have been graded and leveled during this period in association with the relocation of Highway

395. The development of the market and related paved parking area are present by the 1984 aerial and the remaining areas appear as graded and level with the exception of the cut and fill slopes on the upslope sides (NETR 1967, 1984).

1.3 Applicable Regulations

Resource importance is assigned to districts, sites, buildings, structure, and objects that possess exceptional value or qualify illustrating or interpreting the heritage of San Diego County in history, architecture, archaeology, engineering, and culture. A number of criteria are used in demonstrating resource importance. Specifically, criteria outlined in CEQA land the San Diego County Local Register provide the guidance for making such a determination. The following sections(s) details the criteria that a resource must meet in order to be determined important.

1.3.1 California Environmental Quality Act (CEQA)

According to CEQA (§15064.5a), the term "historical resource" includes the following:

(1) A resource listed in, or determine to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code SS5024.1, Title 14 CCR. Section 4850 et seq.).

(2) A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements of section 5024.1(g) of the Public Resources Code, shall be presumed to be historically of culturally significant. Public agencies must treat any such resources as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

(3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code SS5024.1, Tile 14, Section 4852) including the following:

(A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
(B) Is associated with the lives of person important in our past;
(C) Embodies the distinctive characteristics of a type, period, region, or individual, or possesses high artistic value; or
(D) Has yielded, or may be likely to yield, information important in prehistory or history.

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

According to CEQA (§15064.5b), 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. CEQA defines a substantial adverse change as:

(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 historical 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.

Section 15064.5(c) of CEQA applies to effects on archaeological sites and contains the following additional provisions regarding archaeological sites:

(1) When a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource, as defined in subsection (a).

(2) If a lead agency determines that the archaeological site is an historical resource, it shall refer to the provisions of Section 21084.a of the Public Resources Code, and this section, Section 15126.4 of the Guidelines, and the limits contained in Section 21083.2 of the Public Resources Code do not apply.

(3) If an archaeological site does not meet the criteria defined in subsection (a), but does meet the definition of a unique archaeological resource in Section 21083.2 of the Public

Resources Code, the site shall be treated in accordance with the provisions of section 21083.2. The time and cost limitations described in Public Resources Code Section 21083.2 (c-f) do not apply to surveys and site evaluation activities to determine whether the project location contains unique archaeological resources.

(4) If an archaeological resource is neither a unique archaeological nor an historical resource, the effects of the project o n those resources shall not be considered a significant effect on the environment. It shall be sufficient that both the resource and the effect on it are noted in the Initial Study or EIR, if one is prepared to address impacts on other resources, but they need not be considered further in the CEQA process.

Section 1564.5 (d) & (e) contain additional provisions regarding human remains. Regarding Native American human remains, paragraph (d) provides:

(d) When an initial study identifies the existence of, or the probably likelihood, of Native American human remains within the project, a lead agency shall work with the appropriate Native Americans as identified by the Native American Heritage Commission as provided in Public Resources Code SS5097398. The applicant may develop an agreement for treating or disposing of, with appropriate dignity, the human remains and any items associated with Native American burials with the appropriate Native Americans as identified by the Native American Heritage Commission. Action implementing such an agreement is exempt from:

(1) The general prohibition on disinterring, disturbing, or removing human remains from any location other than a dedicated cemetery (Health and Safety Code Section 7050.5).

(2) The requirement of CEQA and the Coastal Act.

1.3.2 San Diego County Local Register of Historical Resources (Local Register)

The County requires that resource importance be assessed not only at the State level as required by CEQA, but at the local level as well. If a resource meets any one of the following criteria as outlined in the Local Register, it will be considered an important resource.

(1) Is associated with events that have made a significant contribution to the broad patterns of San Diego County's history and cultural heritage;
(2) Is associated with the lives of persons important to the history of San Diego County or its communities;

(3) Embodies the distinctive characteristics of a type, period, San Diego County 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.

1.3.3 San Diego County Resource Protection Ordinance (RPO)

The County of San Diego's RPO protects significant cultural resource. The RPO defines "Significant Prehistoric or Historic Sites" as follows:

> Sites that provide information regarding important scientific research questions about prehistoric or historic activities that have scientific, religious, or other ethnic value of local, regional, State, or Federal importance.

Such locations shall include, but not be limited to:

(1) Any prehistoric or historic district, site, interrelated collection of features or artifacts, building, structure, or object either:

  (aa) Formally determined eligible or listed in the National Register of Historic Placed by the Keeper of the National Register; or

  (bb) To which the Historic Resource ("H" Designator) Special Area Regulations have been applied; or

(2) One-of-a-kind, locally unique, or regionally unique cultural resources which contain a significant volume and range of data and materials; and

(3) Any location of past or current sacred religious or ceremonial observances which is either:

  (aa) Protected under Public Law 95-341, the American Indian Religious Freedom Act or Public Resources Code Section 5097.9, such as burial(s), pictographs, petroglyphs, solstice observatory sites, sacred shrines, religious ground figures or,

  (bb) Other formally designated and recognized sites which are of ritual, ceremonial, or sacred value to any prehistoric or historic ethnic group.

The RPO does not allow non-exempt activities or uses damaging to significant prehistoric or historic lands on properties under County jurisdiction. This includes development, trenching, grading, clearing and grubbing, or any other activity or use damaging to significant prehistoric or historic lands. The only exempt activity is scientific investigation with an approved research design prepared by an archaeologist certified by the Society of Professional Archaeologists. All discretionary projects are required to be in conformance with applicable County Standards related to cultural resources, including the noted RPO criteria on prehistoric and historic sites. Non-compliance would result in a project that is inconsistent with County standards.

1.3.4 Traditional Cultural Properties/Tribal Cultural Resources

Native American Heritage Values

Federal and state laws mandate that consideration be given to the concerns of contemporary Native Americans with regard to potentially ancestral human remains, associated funerary objects, and items of cultural patrimony. Consequently, an important element in assessing the significance of the study site has been to evaluate the likelihood that these classes of items are present in areas that would be affected by the proposed project.

Potentially relevant to prehistoric archaeological sites is the category termed Traditional Cultural Properties (TCP) in discussions of cultural resource management (CRM) performed under federal auspices. According to Patricia L. Parker and Thomas F. King (1990), "Traditional" in this context refers to those beliefs, customs, and practices of a living community of people that have been passed down through the generations, usually orally or through practice. The traditional cultural significance of a historic property, then, is significance derived from the role the property plays in a community's historically rooted beliefs, customs, and practices.

The County of San Diego Guidelines identifies that cultural resources can also include TCPs, such as gathering areas, landmarks, and ethnographic locations in addition to archaeological districts (2007). These guidelines incorporate both State and Federal definitions of TCPs. Generally, a TCP may consist of a single site, or group of associated archaeological sites (district; traditional cultural landscape), or an area of cultural/ethnographic importance.

The Traditional Tribal Cultural Places Bill of 2004 requires local governments to consult with Native American representatives during the project planning process. The intent of this legislation is to encourage consultation and assist in the preservation of "Native American places of prehistoric, archaeological, cultural, spiritual, and ceremonial importance" (County of San Diego 2007). It further allows for tribal cultural places to be included in open space planning. State Assembly Bill 52, in effect as of July 1, 2015, introduces the Tribal Cultural Resource (TCR) as a class of cultural resource and additional considerations relating to Native American consultation into CEQA. As a general concept, a TCR is similar to the federally-defined TCP, however incorporates consideration of local and state significance and required mitigation under CEQA. A TCR may be considered significant if included in a local or state register of historical resources; or determined by the lead agency to be significant pursuant to criteria set forth in PRC §5024.1; or is a geographically defined cultural landscape that meets one or more of these criteria; or is a historical resource described in PRC §21084.1, a unique archaeological resources described in PRC §21083.2, or is a non-unique archaeological resource if it conforms with the above criteria.

In 1990 the NPS and Advisory Council for Historic Preservation introduced the term "TCP" through National Register Bulletin 38 (Parker and King 1990). A TCP may be considered eligible based on "its association with cultural practices or beliefs of a living community that (a) are rooted in that community's history, and (b) are important in maintaining the continuing cultural identity of the community" (Parker and King 1990:1). Strictly speaking, Traditional Cultural Properties are both tangible and intangible; they are anchored in space by cultural values related to community-based physically defined "property referents" (Parker and King 1990:3). On the other hand, TCPs are largely ideological, a characteristic that may present substantial problems in the process of delineating specific boundaries. Such a property's extent is based on community conceptions of how the surrounding physical landscape interacts with existing cultural values. By its nature, a TCP need only be important to community members, and not the general outside population as a whole. In this way, a TCP boundary, as described by Bulletin 38, may be defined based on viewscape, encompassing topographic features, extent of archaeological district or use area, or a community's sense of its own geographic limits. Regardless of why a TCP is of importance to a group of people, outsider acceptance or rejection of this understanding is made inherently irrelevant by the relativistic nature of this concept.

2.0 GUIDELINES FOR DETERMINING SIGNIFICANCE

Any of the following will be considered a potentially significant environmental impact to cultural resources:

1. The project causes a substantial adverse change in the significance of a historical resource as defined in §15064.5 of the State Guidelines. This shall include the destruction, 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 §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 of 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 cultural resources as defined by the Resource Protection Ordinance (RPO) and fails to preserve those resources.

5. The project proposes activities or uses that would impact tribal cultural resources as defined under Public Resources Code §21074.

The Guidelines listed above have been selected for the following reasons:

Guidelines 1 and 2 are derived directly from CEQA. Section 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.

Guideline 4 was selected because the RPO 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 the RPO would be considered a significant impact. The only exception is scientific investigation.

Guideline 5 was selected because tribal cultural resources are of cultural value to Native American tribes. Any project that would have an adverse impact (direct, indirect, and cumulative) on tribal cultural resources as defined by PRC §21074 would be considered a significant impact.

All discretionary projects are required to be in conformance with applicable County standards related to cultural resources, including the noted RPO criteria on prehistoric and historic sites. In addition discretionary projects must also comply with the requirements of the Zoning Ordinance, General Plan, and the Grading, Clearing, and Watercourses Ordinance (§87.429). Non-compliance would result in a project that is inconsistent with County standards.

3.0 ANALYSIS OF PROJECT EFFECTS

3.1 Methods

3.1.1 Survey Methods

The survey of the project area was conducted on December 18, 2020 by Mr. Andrew R. Pigniolo, RPA. Ms. Aleshanee Ventura from Saving Sacred Sites served as Native American monitor during the survey. The property was generally open and the entire parcel was surveyed using 10 to 15 m transect intervals. Surface visibility was moderate, averaging approximately 60 percent throughout the project area. Some portions include existing buildings and hardscape parking lots and visibility was limited to areas of landscaping in these portions of the project. The remainder of the area was very open with approximately 95 percent surface visibility. The cultural resources survey of the project adequately served to identify cultural resources.

3.1.2 Artifact Conveyance

No artifacts were recovered during the survey therefore artifact conveyance is not necessary at this time. Photographs and project records for this inventory will be temporarily curated at Laguna Mountain until final curation arrangements can be made at the San Diego Archaeological Center or another appropriate regional repository.

3.1.3 Native American Participation

Native American involvement in the project included Saving Sacred Sites, who provided Ms. Aleshanee Ventura as Native American Monitor to participate in the field survey.

A Sacred Lands search was conducted with the California Native American Heritage Commission (NAHC). A response of positive results in the project area was received on December 22, 2020 (Appendix C). Scoping letters were submitted to the 28 Native American contacts provided by the NAHC (see Appendix C). Cheryl Madrigal, THPO of the Rincon Band of Luiseño Indians, had requested information on the project and potential impacts prior to the requests for consultation letters were sent out (see Appendix C). Lisa Cumper, THPO of the Jamul Indian Village, sent a reply stating that while the project is outside their Tribal area as well as Traditional Use Area (TUA), they request to be kept informed about the project progress. They also recommend an Approved Cultural Monitor be present during all ground-disturbing activities. Director of Cultural Resources for the Iipaay Nation of Santa Ysabel, Clint Linton, sent a brief reply with his recommendation. The Cultural Coordinator for Temecula Band of Luiseño Mission Indians, Paul Macarro, responded that while the project is not in their reservation land they are interested in participating in the project and wants to be informed when the project begins, and they want to provide a Pechanga monitor during earthmoving activites. No other responses were received.

3.2 Survey Results

The cultural resource survey did not identify any cultural resources within the project area. The area appears to have been highly disturbed in the past. Portions of the area are developed with buildings and paved parking lots (Figure 4a) while other areas have been used as a nursery in the past and are currently open dirt (Figure 4b).

The area appears to have been graded and leveled in the past. A significant fill and cut slope is present on three sides of the lot suggesting extensive grading. Past aerial photographs indicate the area originally sloped to the east and was graded to a level condition prior to development before 1984. Current exposed soils appear to represent older Pleistocene material and native topsoil was absent from the project area.

A major sewer line appears to be present along the eastern edge of the project area. Disturbance-related soils from this previous excavation did not indicate the presence of cultural material and again suggested older subsoil deposits. No historic or prehistoric cultural resources were identified during the survey.

Figure 4 Project Overviews

4.0 INTERPRETATION OF RESOURCE IMPORTANCE AND IMPACT IDENTIFICATION

4.1 Resource Importance

The cultural resource survey did not identify any cultural resources within the project area.

4.1.1 Native American Heritage Resources/Traditional Cultural Properties

No information has been obtained through Native American consultation or communication with the Native American monitors during fieldwork that any culturally or spiritually significant resources were present. No Traditional Cultural Properties that currently serve religious or other community practices are known to exist within the project area. During the current archaeological evaluation, no artifacts or remains were identified or recovered that could be reasonably associated with such practices.

4.2 Impact Identification

No cultural resources will be impacted by the proposed project. Due to the extensive amount of previous cut and grading activity, the potential for buried cultural resources is very low to non-existent.

5.0 MANAGEMENT CONSIDERATIONS-MITIGATION MEASURES AND DESIGN CONSIDERATIONS

The goal of the project was to identify resources that may be impacted by the project. The survey did not identify cultural resources within the project area.

5.1 Mitigable Impacts

Based on the current project plan no cultural resources will be directly impacted by the current project. Due to the extensive amount of previous cut and grading activity, the potential for buried cultural resources is very low to non-existent. The project will result in no effects to cultural resources.

5.2 No Effect

Based on the absence of cultural resources within the project, no effects to cultural resources are likely to result from project impacts.

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7.0 LIST OF PREPARERS AND PERSONS AND ORGANIZATIONS CONTACTED

7.1 List of Preparers

Laguna Mountain Environmental, Inc.
Andrew R. Pigniolo, RPA, Primary Author
Carol Serr

7.2 List of Persons and Organizations Contacted

Saving Sacred Sites
Cami Mojado
Ms. Aleshanee Ventura

South Coastal Information Center (SCIC)
Jaime Lennox

Laguna Mountain Environmental, Inc - Archival Maps and Records

8.0 LIST OF MITIGATION MEASURES AND DESIGN CONSIDERATIONS

Mitigation Measures	Design Considerations
No mitigation measures are recommended for this project.	No design considerations are necessary for this project.

APPENDICES

A. Resume of Principal Investigator
B. Records Search Confirmation
C. Native American Correspondence (Confidential – Bound Separately)

APPENDIX A

RESUME OF PRINCIPAL INVESTIGATOR

APPENDIX B

RECORDS SEARCH CONFIRMATION

APPENDIX D

NATIVE AMERICAN CORRESPONDENCE

(Confidential – Bound Separately)