



April 13, 2020

Elmer Alex, Sewer Engineering Division Manager
200 Civic Center Drive
Vista, CA 92084

Reference: Cultural Resources Study for the Roman Creek Mitigation and Habitat Restoration Project at Buena Vista Park, City of Vista, California

Introduction

This letter report provides the results of cultural resources study for the proposed Roman Creek Mitigation and Habitat Restoration Project (Project) as proposed by the City of Vista (City) in the City of Vista, California. The City is proposing the Roman Creek Mitigation Site (Mitigation Site), a combined hydromodification and habitat restoration improvement project, within the western portions of Buena Vista Park as part of the Project. Buena Vista Park is owned by the City and managed by the City's Parks and Recreation Department.

According to the City's General Plan 2030, Buena Vista Park contains both active use areas and areas intended for the permanent conservation of natural resources. Of the Park's 150 acres, approximately 30.6 acres are dedicated to active use, and the remaining 119.4 acres are dedicated to open space and trails (City of Vista 2011). The City's General Plan 2030 Update included the adoption of a Biological Preserve Overlay with the primary purpose of conserving the City's biological resources. The Biological Preserve Overlay was adopted to restrict land uses to only limited passive recreational uses where protection of those resources is ensured, or those uses are required to protect public health and safety.

Project Location

The Project is located within the proposed 16.7-acre Mitigation Site, which is generally located along Roman Creek, a tributary of Agua Hedionda Creek, and within the western and southern portions of Buena Vista Park, south of Shadowridge Drive. This area lies within Section 6, Township 12 South, Range 3 West of the San Bernardino Base and Meridian 7.5-minute San Marcos, California Quadrangle (Figure 1).

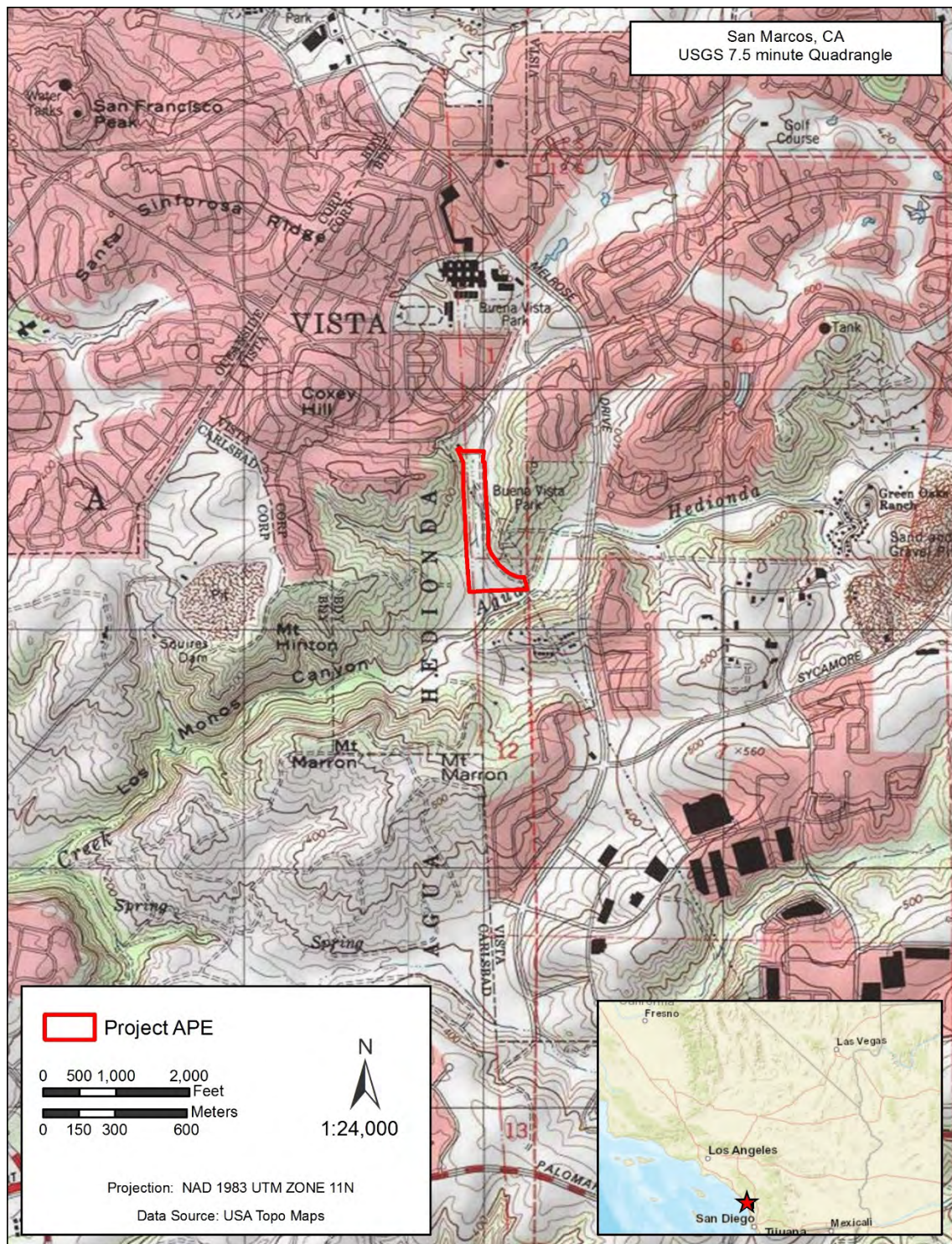
Description of the Project

The City's goal for the Project is to address existing hydromodification impacts within the lower reaches of Roman Creek while providing a reliable source of compensatory mitigation for biological resources impacts associated with the 2017 Comprehensive Sewer Master Plan and related sewer capital improvement projects.

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Figure 1. Project APE shown on the San Marcos United States Geological Survey 7.5' quadrangle



The Project would involve the implementation of riparian, streambed, and upland mitigation and habitat restoration opportunities within the western portion of Buena Vista Park. The proposed 16.7 acre Mitigation Site would include a combination of up to 12.2 acres of habitat establishment, enhancement, and rehabilitation in conjunction with the implementation of hydromodification improvements at strategic locations. The City's proposed Mitigation Site would be subject to approval from the U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service, and California Department of Fish and Wildlife. Once approved, the City would be responsible for implementation, habitat success monitoring, and long term management, including adaptive management and maintenance. Figure 2 illustrates the Mitigation Site area in relation to the existing Park site and Dawson Los Monos Ecological Reserve.

In conjunction with the proposed Project and to promote the habitat establishment, enhancement, and rehabilitation opportunities proposed at the Mitigation Site, access to the riparian corridor along Roman Creek would be omitted through the installation of fencing at appropriate locations. New interpretative signage would be included at strategic locations and multiple sections of the designated trail network would be enhanced to minimize localized sediment inputs to Roman Creek, reduce hydraulic restrictions within Roman Creek, minimize degradation of the trail network, and improve walkability. Additionally, replacement of the existing, undersized bridge crossing over Roman Creek with a new 110-foot bridge would occur.

Mitigation Site preparation activities would involve clearing and grubbing which would include the removal and disposal of all undesirable material, including large eucalyptus trees, Mexican fan palm trees, tamarisk, non-native grasses, mustards, thistles, excess plant detritus, and trash. Earthwork activities will include grading, excavation, and backfilling, the limits of which will be defined in the field.

Area of Potential Effect

The proposed Project is subject to compliance with the California Environmental Quality Act (CEQA), as amended through 2019. If a Section 404 Permit per the requirements of the Clean Water Act is required, consultation under Section 106 of the National Historic Preservation Act will also be required. Therefore, this cultural resources study was conducted in compliance with the CEQA and National Historic Preservation Act Statutes and Guidelines. Consistent with the requirements of Section 106, a horizontal area of potential effect (APE) was delineated to enable for the collection of background and archival record searches and a thorough pedestrian survey.

The Project APE encompasses the 16.7 acre Roman Creek Mitigation Site on the southwest side of Buena Vista Park in Vista, CA on the east and west sides of Roman Creek, south of Shadowridge Drive and north of Agua Hedionda Creek (Figure 3). Activities within the APE would include habitat establishment, enhancement, and rehabilitation of the existing riparian corridor along Roman Creek in conjunction with the implementation of hydromodification improvements at strategic locations. Site grading and excavation would extend up to 10 feet in certain locations west of the Roman Creek centerline. HDR archaeologists Dan Leard and Dan Leonard conducted the survey of the entire horizontal APE on June 21, 2019.

Figure 2. Proposed Project Management and Use Area



Figure 3. Aerial overview of the Project Area of Potential Effect



Background Studies

As part of this study, HDR conducted a background and archival records search of the project area that included a search of the cultural resources databases housed with the South Coastal Information Center, the Sacred Lands File (SLF) kept with the Native American Heritage Commission (NAHC), and any available historic documentation and aerial imagery for the area. On February 21, 2019 a request was submitted to the South Coastal Information Center for a record search of all archaeological and historical resources within 0.5 mile of the APE. The record search identified 24 cultural resource projects and 34 cultural resources. The results of the search are summarized in Table 1 and Table 2 (Confidential Appendix A). On April 3, 2019 a letter was sent to the NAHC requesting a review of the SLF for any registered cultural resources, traditional cultural properties, or areas of heritage sensitivity within the vicinity of the project area. The results of the SLF were negative. The full response from the NAHC is attached as Appendix B.

Previous Cultural Resource Studies

The records search identified 24 cultural resource survey, excavation, and monitoring projects within a half mile of the APE. These survey and monitoring projects took place between 1974 and 2017 and cover the entire APE.

Archaeological Resources

The record search identified 34 previously recorded archaeological resources within a half mile radius of the APE. The previously recorded resources include 19 prehistoric habitation sites, five prehistoric isolated finds, six historic archaeological sites, one historic structure, one historic eucalyptus grove, and two historic trails. Of the 34 resources, one archaeological site, P-37-5781 (CA-SDI-5781H), is within the APE. P-37-5781 was recorded by M. J. Hatley in 1978 and consists of a historic eucalyptus grove of the blue gum variety. The grove was planted in 1888 by Isabel and Hamilton Monroe Squires to serve as timber culture, a commonly used means of land improvement necessary to acquire and maintain ownership of land (Hartley 1978).

Survey Methods

HDR cultural resources specialists conducted a thorough pedestrian surface inspection of the entire project APE. The pedestrian survey was consistent with the Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation (48FR 44716, September 29, 1983) with the intent to locate and record all cultural resources. Survey methods conformed to prevailing State of California and the Secretary of the Interior's Standards and Guidelines. HDR pedestrian survey transect intervals did not exceed 15 meters. All cultural resources encountered were fully documented and photographed and all spatial data was recorded using a Trimble GeoXT handheld GPS unit with sub-meter accuracy. Field sketches, field artifact inventories, and detailed field notes were employed to document cultural resources.

Survey Results

The Roman Creek APE extends along the southwestern side of Buena Vista Park (Photograph 1 and Photograph 2). The terrain includes the Roman Creek riparian corridor, flat to gently sloped alluvial fans and terraces on either side of Roman Creek, and moderate hill slopes (USDA NRCS 2019). Topographically, the APE is in a shallow gorge that drains south into Los Monos Canyon where it confluences with Agua Hedionda Creek. Elevation ranges from 345 feet above means sea level (AMSL) at the north end to 295 feet AMSL at the south end. Buena Vista Park includes marsh, willow, and oak riparian vegetation within the creek corridor and eucalyptus trees, oak woodlands, coastal sage scrub, grasslands, and chaparral vegetation on the adjacent uplands. An informal trail network provides public access to much of the park with a small pedestrian bridge providing access across Roman Creek at the southern end of the park. As a result of the survey, previously recorded archaeological site CA-SDI-5781H was relocated and updated. No new archaeological sites or other cultural resources were identified during the survey.

Photograph 1. Overview of the Roman Creek Mitigation Site from the north edge facing south



Photograph 2. Overview of the Roman Creek Mitigation Site from the south edge facing north



CA-SDI-5781H

CA-SDI-5781H was originally recorded by M. J. Hatley based on interviews with Ida Dawson conducted on April 27 and 28, 1978. The site consists of an historic eucalyptus grove of the Blue Gum variety (*Eucalyptus globulus*). The grove was reportedly planted in 1888 by Isabel Squires to serve as timber culture, a commonly used means of land improvement necessary to acquire and maintain ownership of land. According to information obtained from Mrs. Dawson, the trees were grown from seeds costing \$8.00 an ounce and were first planted and tended in flats for one year. They were then planted by Isabel and Hamilton Monroe Squires along what was previously a well-traveled road.

The site is situated at the eastern edge of the historic Rancho Agua Hedionda land grant. Rancho Agua Hedionda was owned by the Marron family since the 1840s and consisted of 13,311 acres extending from the Pacific Ocean inland almost to Vista and from Carlsbad south of Encina Canyon (Anderson 2007). In 1865 Francis Hinton assumed ownership of the Rancho. After Hinton's death in 1870, the land was willed to his mayordomo Robert Kelly, who continued operation of the Rancho until his death in 1890 (Anderson 2007, Carlsbad Historical Society n.d.). When Robert Kelly died, the rancho was willed to his nine nieces and nephews, one of which may have been Mary Emma Kelly (Guinn 1907). After 1896, the Kelly family divided Rancho Agua Hedionda into separate parcels. Ida Dawson was the daughter of Hamilton Squires and Mary Emma Kelly, two pioneers of the Vista area. Mrs. Dawson reportedly inherited some of the original land grant acreage of the Rancho Agua Hedionda y Los Manos (Vista Historical Society n.d.).

A dense grove of eucalyptus was relocated at the recorded location within the park. The eucalyptus trees are within a 2.45-acre area measuring approximately 987 feet from north to south and 145 feet east to west, generally along the western side of Roman Creek (Photograph 3). The trees also line the eastern edge of the dirt walking path that extends along the western side of Buena Vista Park (Photograph 4). Most of the trees appear to be fairly young; however, several larger and presumably older trees and large saw cut and burnt stumps were observed. In addition to use as timber, eucalyptus trees were commonly used as windbreaks along highways and farms. A north-south road is visible on the western side of the creek on the 1893 Escondido, CA 1:62500 topographic map. The road extends south across Agua Hedionda Creek on the 1948 San Marcos, CA 1:24000 topographic quadrangle and another connecting dirt road is depicted on the eastern side of Roman Creek. This is likely the "well-traveled road" referenced by Ida Dawson. No elements of the original road were identified during survey; however, the current Buena Vista Park walking trail is adjacent to the site and appears to follow the old road alignment. Additional recreational walking trails cut through the eucalyptus grove area and connect to the creek.

Photograph 3. CA-SDI-5781H, overview of eucalyptus grove, facing north from the approximate site center on the western side of Roman Creek.



Photograph 4. CA-SDI-5781H, overview of eucalyptus along the eastern side of path, taken from the northwest edge of the site facing south.



CA-SDI-5781H has not been evaluated for its significance and potential inclusion on the National Register of Historic Places (NRHP) and the California Register of Historic Resources (CRHR). Archaeological sites are considered significant under Criterion C if they embody the distinctive characteristics of a type, period, or method of construction, or represent the work of a master, or possess high artistic value. As the site consists solely of planted trees, Criterion C is not applicable. Additionally, the site does not possess any associated historic features or artifact scatter and is unlikely to contain a subsurface component that may be likely yield information important to the history of the area. Therefore, the site is not eligible for the NRHP nor the CRHR under Criterion D.

Historic sites are significant under Criterion A if they are associated with events that have made a significant contribution to the broad patterns of local history. Under the thematic framework of peopling and development of the area, the site may have significance to local history. Historic sites are significant under Criterion B if they are strongly associated with the lives of persons who have made a significant contribution to national, state, or local history. The site has a known association with Isabella and Hamilton Monroe Squires. However, little is known about the Squires and historic research thus far has not identified a significant contribution to the local history.

In addition to eligibility under at least one of the four criteria, archaeological resources also must have retained enough integrity to convey their significance to people in the present (National Register Bulletin 34). The National Register identifies seven elements of integrity: location, design, setting, materials, workmanship, feeling, and association. Of these, only location, setting, feeling, and association are applicable. Though the site may retain integrity of location and association, it does not retain integrity of setting or feeling. The surrounding area has been developed in recent times and does not retain the physical environment or setting during the time of significance. The features of the site in combination with the setting do not evoke an aesthetic or historic sense of the property at particular period of time. The site may retain integrity of association with the Squires and the settlement of the area. However, most of the eucalyptus trees appear to be younger, recent growth. Therefore, the site lacks key aspects of integrity that would make it eligible for nomination to the NRHP. Pending State Historic Preservation Officer concurrence, HDR recommends that CA-SDI-5781H be considered not eligible for inclusion on the NRHP or the CRHR.

Impact Evaluation

As defined in Appendix G of the 2019 State CEQA Guidelines, project impacts to cultural resources would be considered significant if the project was determined to:

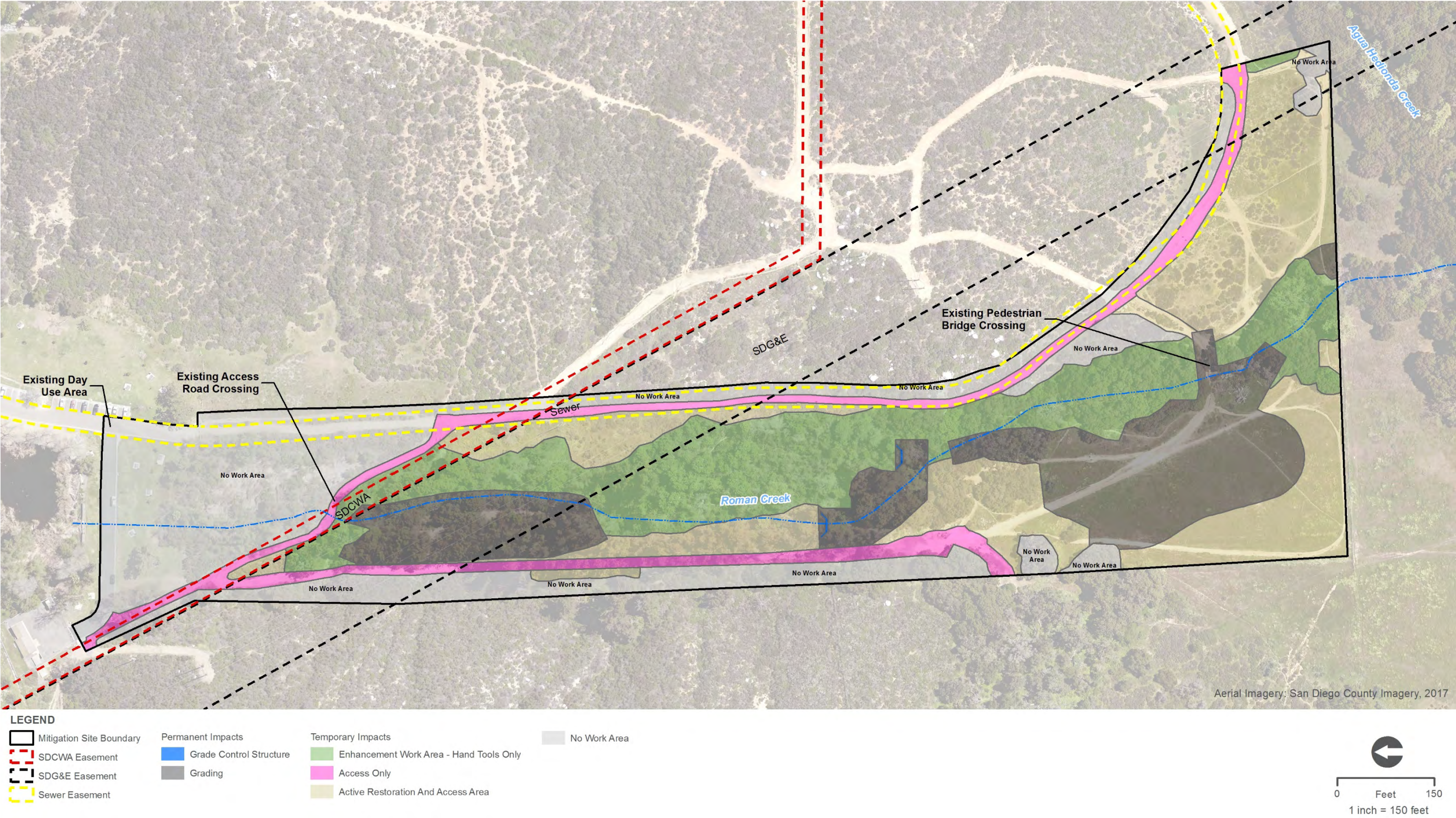
- a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the CEQA Guidelines;
- b) Cause a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5 of the CEQA Guidelines;
- c) Disturb any human remains, including those interred outside of formal cemeteries (see Public Resources Code, Ch. 1.75, § 5097.98, and Health and Safety Code § 7050.5(b)); or
- d) Cause a substantial adverse change in the significance of a Tribal Cultural Resource as defined in Public Resources Code §21074?

The following evaluation considers the potential impacts to the cultural resources identified within the APE project activities shown on Figure 4.

- a) *Would the project cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the CEQA Guidelines?*

Project construction activities could include clearing and grubbing, grading, excavation and backfilling, and the removal of trees and vegetation. Based on the project APE, one historic resource was identified within the area of direct impact. CA-SDI-5781H is a historic eucalyptus grove planted in 1888. Mitigation activities include the removal of large eucalyptus trees. As the recorded resource is comprised entirely of eucalyptus trees, removal of the trees would destroy the site. The site has not been previously evaluated for significance and inclusion on the NRHP or the CRHR. HDR recommends site CA-SDI-5781H ineligible; pending State Historic Preservation Officer concurrence, project related impacts to historical resources as defined in Section 150664.5 of the CEQA Guidelines would be less than significant.

Figure 4. Proposed Mitigation Site Construction and Grading Limit



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- b) Would the project cause a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5 of the CEQA Guidelines?*

As provided on Figure 5, the City applied probable work limits for construction for the Project. This included approximating the area of direct impact for construction, adjacent staging areas, and/or other temporary work and grading areas. The areas of potential grading are defined on Figure 5. As previously described, CA-SDI-5781H is recorded as a potential historic archaeological site within the APE that is recommended as ineligible for listing on listing on the CRHR and NRHP. Therefore, removal of the eucalyptus trees, including the associated stumps, in conjunction with restoration of the riparian corridor would not result in a significant impact to an archaeological resource as defined in Section 15064.5(c) of the CEQA Guidelines.

Although no resources were observed at the surface during the archaeological survey, research for the area suggests that excavation and grading activities may disturb buried subsurface, archaeological or historic artifacts or features associated with the historic occupation of the Project area. The results of the record search indicate a high density of prehistoric habitation sites within one-half mile of the APE. Additional cultural material may be buried underneath the alluvial soils. As a result, the Project has the potential to cause significant impacts to cultural resources that may be eligible for listing on the CRHR and NRHP. In the absence of mitigation, Project related excavation may cause the destruction, relocation, or alteration of buried archaeological deposits that may be likely to yield information important to prehistory or history. This is considered a potentially significant impact and Mitigation Measure CULT-1 through CULT-5 is required prior to and during all grading or excavation. Following implementation of the proposed mitigation, this impact would be reduced to a less than significant level.

- c) Would the project disturb any human remains, including those interred outside of formal cemeteries?*

During Project grading and excavation activities, the potential for the unexpected discovery of interred human remains, either prehistoric or historic, is a possibility. The physical disturbance of any human remains, including those interred outside of formal cemeteries, would represent a significant, adverse impact in the absence of mitigation. Implementation of Mitigation Measure CULT-6 is proposed to reduce the potential for adverse impacts in the event of an accidental discovery of human remains during construction. With the proposed mitigation, this impact would be reduced to a less than significant level.

- d) Would the project cause a substantial adverse change in the significance of a Tribal Cultural Resource as defined in Public Resources Code §21074?*

No Tribal Cultural Resources were identified by the records search or during the on-site archaeological survey. On April 3, 2019 a letter was sent to the NAHC requesting a review of the SLF for any registered cultural resources, traditional cultural properties, or areas of heritage sensitivity within the vicinity of the project area. The results of the SLF were negative. However, the NAHC did provide a contact list of known Native American tribes that may have knowledge of cultural resources in the project area. This letter correspondence is provided in Appendix B.

City staff consulted with California Native Americans representatives per the requirements of AB 52 on the potential impacts of the project. It was agreed that due to the cultural richness of the area, there could be potentially significant impacts (e.g., destruction or alteration) to unknown tribal cultural resources from grading or excavation during project construction. However, with the implementation of the proposed mitigation measures below, potential impacts to undiscovered tribal cultural resources would be reduced to a less than significant level.

Mitigation Recommendations

Based on the impact analysis for the proposed Project and AB 52 consultation with California Native American tribes, the following mitigation measures are proposed to reduce the above-noted impacts to less than significant levels.

CULT-1 Cultural Resources Monitoring. Cultural resource mitigation monitoring shall be conducted on the site to provide for the identification, evaluation, treatment, and protection of any cultural resources that are affected by or may be discovered during the construction of the proposed project. The monitoring shall consist of the full-time presence of a Qualified Archaeologist and a traditionally and culturally affiliated (TCA) Native American Monitor associated with a TCA tribe for, but not limited to, any clearing or grubbing of vegetation, tree removal, demolition and/or removal of remnant foundations, pavements, abandonment and/or installation of infrastructure; grading or any other ground disturbing or altering activities, including the placement of any imported fill materials (note: all fill materials shall be absent of any and all cultural resources); and any related road improvements, including, but not limited to, the installation of infrastructure, realignments, and/or expansions to parking lots. Other tasks of the monitoring program shall include the following:

- The requirement for cultural resource mitigation monitoring shall be noted on all applicable construction documents, including demolition plans, grading plans, etc.
- The Qualified Archaeologist and TCA Native American Monitor shall attend at least one pre-construction meeting with the Contractor and/or associated Subcontractors (e.g., Grading Contractor) and a representative from the City of Vista's Engineering or Community Development departments to present the archaeological monitoring program as presented in these measures.
- The Qualified Archaeologist shall maintain ongoing collaborative consultation with the TCA Native American Monitor during all ground disturbing or altering activities, as identified above. The Contractor or Grading Contractor shall notify the Director of Community Development & Engineering, preferably through e-mail, of the start and end of all ground-disturbing activities.
- The Qualified Archaeologist and/or TCA Native American Monitor may halt ground-disturbing activities if archaeological artifact deposits or cultural features are discovered. In general, ground-disturbing activities shall be directed away from these deposits for a short time to allow a determination

of potential significance, the subject of which shall be determined by the Qualified Archaeologist and the TCA Native American Monitor, in consultation with the San Luis Rey Band of Mission Indians (San Luis Rey Band), or other TCA tribe. Ground disturbing activities shall not resume until the Qualified Archaeologist, in consultation with the TCA Native American Monitor, deems the cultural resource or feature has been appropriately documented and/or protected. At the Qualified Archaeologist's discretion, the location of ground disturbing activities may be relocated elsewhere on the project site to avoid further disturbance of cultural resources.

- The avoidance and protection of discovered unknown and significant cultural resources and/or unique archaeological resources is the preferable mitigation for the proposed project. If avoidance is not feasible, culturally appropriate treatment of those resources, including but not limited to funding an ethnographic or ethnohistoric study of the resource(s), and/or developing a data recovery plan may be authorized by the City as the Lead Agency under CEQA. If data recovery is required, then the San Luis Rey Band or other TCA tribe shall be notified and consulted in drafting and finalizing any such recovery plan.

CULT-2 Grading Plan Review and Pre-Excavation Agreement. Prior to the submission of a grading plan to City staff for review, the Applicant or Owner, and/or Contractor shall enter into a Pre-Excavation Agreement with the San Luis Rey Band, or other TCA tribe. A copy of the agreement shall be included in the grading plan submission. The purpose of this agreement shall be to formalize protocols and procedures between the Applicant or Owner, and/or Contractor, and the San Luis Rey Band (or other TCA tribe) for the protection and treatment of, including but not limited to, Native American human remains, funerary objects, cultural and religious landscapes, ceremonial items, traditional gathering areas and cultural items, located and/or discovered through a monitoring program in conjunction with the construction of the proposed project, including additional archaeological surveys and/or studies, excavations, geotechnical investigations, off-site infrastructure installation, grading, and all other ground disturbing activities.

CULT-3 Cultural Resources Monitoring Report. Prior to the release of the Grading Bond, a Monitoring Report and/or Evaluation Report, which shall comply with Government Code Section 6254(r), shall be submitted by the Qualified Archaeologist, along with the TCA Native American Monitor's notes and comments, to the City Planner for the project administrative record.

CULT-4 Cultural Resources Repatriation. All cultural materials that are associated with burial and/or funerary goods shall be repatriated to the Most Likely Descendant as determined by the Native American Heritage Commission (NAHC) per California Public Resources Code Section 5097.98.

- CULT-5 Cultural Resources Discovery.** Recovered cultural material of historic significance, but not of tribal significance, shall be curated with accompanying catalog, photographs, and reports to a San Diego curation facility that meets federal standards per 36 CFR Part 79. Recovered cultural material of tribal cultural significance shall be repatriated as stipulated in the pre-excavation agreement as described in CULT-2.
- CULT-6 Discovery of Human Remains.** As specified by California Health and Safety Code Section 7050.5, if human remains are found on the project site during construction or during archaeological work, the person responsible for the excavation, or his or her authorized representative, shall immediately notify the San Diego County Coroner's office by telephone. No further excavation or disturbance of the discovery or any nearby area reasonably suspected to overlie adjacent remains (as determined by the Qualified Archaeologist and/or the TCA Native American monitor) shall occur until the Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code 5097.98. If such a discovery occurs, a temporary construction exclusion zone shall be established surrounding the area of the discovery so that the area would be protected (as determined by the Qualified Archaeologist and/or the TCA Native American monitor), and consultation and treatment could occur as prescribed by law. As further defined by State law, the Coroner would determine within two working days of being notified if the remains are subject to his or her authority. If the Coroner recognizes the remains to be Native American, he or she shall contact the Native American Heritage Commission within 24 hours. The Native American Heritage Commission would then make a determination as to the Most Likely Descendent. If Native American remains are discovered, the remains shall be kept *in situ* ("in place"), or in a secure location in close proximity to where they were found, and the analysis of the remains shall only occur on-site in the presence of a TCA Native American monitor.

Thank you for the opportunity to work on this project. If there are any questions regarding the information provided in this letter or if additional information is needed, please contact me at the HDR San Diego office (858) 712-8273.

Sincerely,



Daniel Leard

Staff Archaeologist

Appendices:

Confidential Appendix A. South Coastal Information Center, Records Search Results for the Roman Creek Mitigation Site (removed from this document)

Appendix B. Native American Heritage Commission Letter Correspondence

References

- Anderson, Dan. 2007. *Carlsbad: Rancho Agua Hedionda*. www.carlsbad.ca.us/hedionda.html.
- Carlsbad Historical Society N.d. *Robert Kelly*. www.carlsbadhistoricalsociety.com. Accessed June 25, 2019.
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Appendix A. (Confidential – Removed from this document)

South Coastal Information Center Records
Search Results

Appendix B.
Native American Heritage Commission Letter
Correspondence

NATIVE AMERICAN HERITAGE COMMISSION
Cultural and Environmental Department
1650 Harbor Blvd., Suite 100
West Sacramento, CA 95691
Phone: (916) 373-3710
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Website: <http://www.nahc.ca.gov>
Twitter: @CA_NAHC



April 22, 2019

Wayne Glenn
HDR

VIA Email to: wayne.glenn@hdrinc.com

RE: Roman Creek Mitigation Site Project, San Diego County

Dear Mr. Glenn:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information you have submitted for the above referenced project. The results were negative. However, the absence of specific site information in the SLF does not indicate the absence of cultural resources in any project area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites.

Attached is a list of Native American tribes who may also have knowledge of cultural resources in the project area. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. I suggest you contact all of those indicated; if they cannot supply information, they might recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call or email to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from tribes, please notify the NAHC. With your assistance, we can assure that our lists contain current information. If you have any questions or need additional information, please contact me at my email address: steven.quinn@nahc.ca.gov.

Sincerely,

A handwritten signature in dark ink that reads 'Steven Quinn'.

Steven Quinn
Associate Governmental Program Analyst

Attachment

**Native American Heritage Commission
Native American Contact List
San Diego County
4/22/2019**

**Agua Caliente Band of Cahuilla
Indians**

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Cahuilla

lipay Nation of Santa Ysabel

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Diegueno

**Agua Caliente Band of Cahuilla
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**Barona Group of the Capitan
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Fax: (619) 445-9126
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Diegueno

**La Jolla Band of Luiseno
Indians**

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Pauma Valley, CA, 92061
Phone: (760) 742 - 3771
Luiseno

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resource Section 5097.98 of the Public Resources Code.

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**Native American Heritage Commission
Native American Contact List
San Diego County
4/22/2019**

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Luiseno

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Luiseno

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Luiseno

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Luiseno

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Luiseno

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Native American Contact List
San Diego County
4/22/2019**

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