



**Cultural Resources Survey Report for
the County Animal Shelter
San Diego County, California**

Lead Agency

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NATIONAL ARCHAEOLOGICAL DATA BASE INFORMATION

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Acronyms and Abbreviations

AMSL	above mean sea level
APE	Area of Potential Effect
CEQA	California Environmental Quality Act
County	County of San Diego
CRHR	California Register of Historical Resources
DAS	County Department of Animal Services
project	County Animal Shelter
SCIC	South Coastal Information Center
USDA	United States Department of Agriculture
USGS	United States Geological Survey

Summary

This report details the methods and results of the cultural resource survey for the County Animal Shelter (project). The County of San Diego (County) Department of General Services proposes the construction of an approximate 24,000-square-foot new animal shelter on County-owned lands within the boundaries of the city of Santee. The project is located north of Riverview Parkway and west of North Magnolia Avenue on the southern portion of Assessor's Parcel Number 381-050-69-00. The area of potential effect (APE) is approximately 6.30 acres; however, the survey encompassed the entire parcel totaling 10.58 acres. Currently no work is proposed for the northern portion of the parcel.

The records search identified one prehistoric site (CA-SDI-19370) and one prehistoric isolated artifact (P-37-028466), both are within the project area. RECON did not locate the previously recorded isolated artifact (P-37-028466) or site CA-SDI-19370. Both the site and isolated artifact were located within an area that has been previously graded during construction for a high school that was not completed. The southern portion of the parcel was graded and an elevated pad was created. All artifacts were collected from CA-SDI-19370 during the monitoring program and the site was destroyed during grading. CA-SDI-19370 does not qualify for the San Diego County Local Register or the California Register of Historical Resources.

The survey resulted in finding no cultural resources. However, the Sacred Lands Search was positive, and a Native American monitor was requested through Assembly Bill 52 consultation. Therefore, RECON recommends implementation of a Grading Monitoring Program for the project impact area. Only a Native American monitor would be required to be present during ground-disturbing activities. Should the northern portion be developed in the future, there is a potential for significant impacts to unknown subsurface archaeological deposits. Project impacts to unknown subsurface deposits would be significant and mitigable to below a level of significance. The direct impacts to the northern part of the parcel can be mitigated to a level below significant through implementation of a Construction Monitoring Program during construction. Implementation of these measures would mitigate impacts to unknown buried deposits.

1.0 Introduction

1.1 Project Description

The County of San Diego (County) Department of General Services proposes the construction of an approximate 24,000-square-foot new animal shelter on County-owned lands within the boundaries of the city of Santee (Figure 1). The County Animal Shelter (project) area is within unsectioned portions of the El Cajon land grant of the U.S. Geological Survey (USGS) 7.5-minute topographic map series, El Cajon quadrangle (Figure 2). The project is located north of Riverview Parkway and west of North Magnolia Avenue on the southern portion of Assessor's Parcel Number 381-050-69-00 (Figure 3). Specifically, the project area is located within, and is surrounded by land uses within, the City of Santee's (City's) Town Center Specific Plan Amendment area. The Specific Plan Amendment area established the physical and design framework for the development of approximately 154 acres of County-owned land within the City's 706-acre Town Center Specific Plan area.

The County Department of Animal Services (DAS) provides animal-related law enforcement, sheltering, medical, and pet adoption services to the unincorporated areas of San Diego County. Currently, the County DAS owns and operates two animal shelter facilities in the San Diego region: one located in the community of Bonita and the other in the city of Carlsbad. The project would replace the existing Bonita Shelter located at 5821 Sweetwater Road. The project would be constructed to meet the County DAS current and projected needs for the county. The project would provide animal services in a modern facility and would have the capacity for the transfer of all the Bonita Shelter animals and services, including all livestock. The Carlsbad Shelter, which was redeveloped and expanded in 2005, would remain open and all other services and functions would remain unchanged.

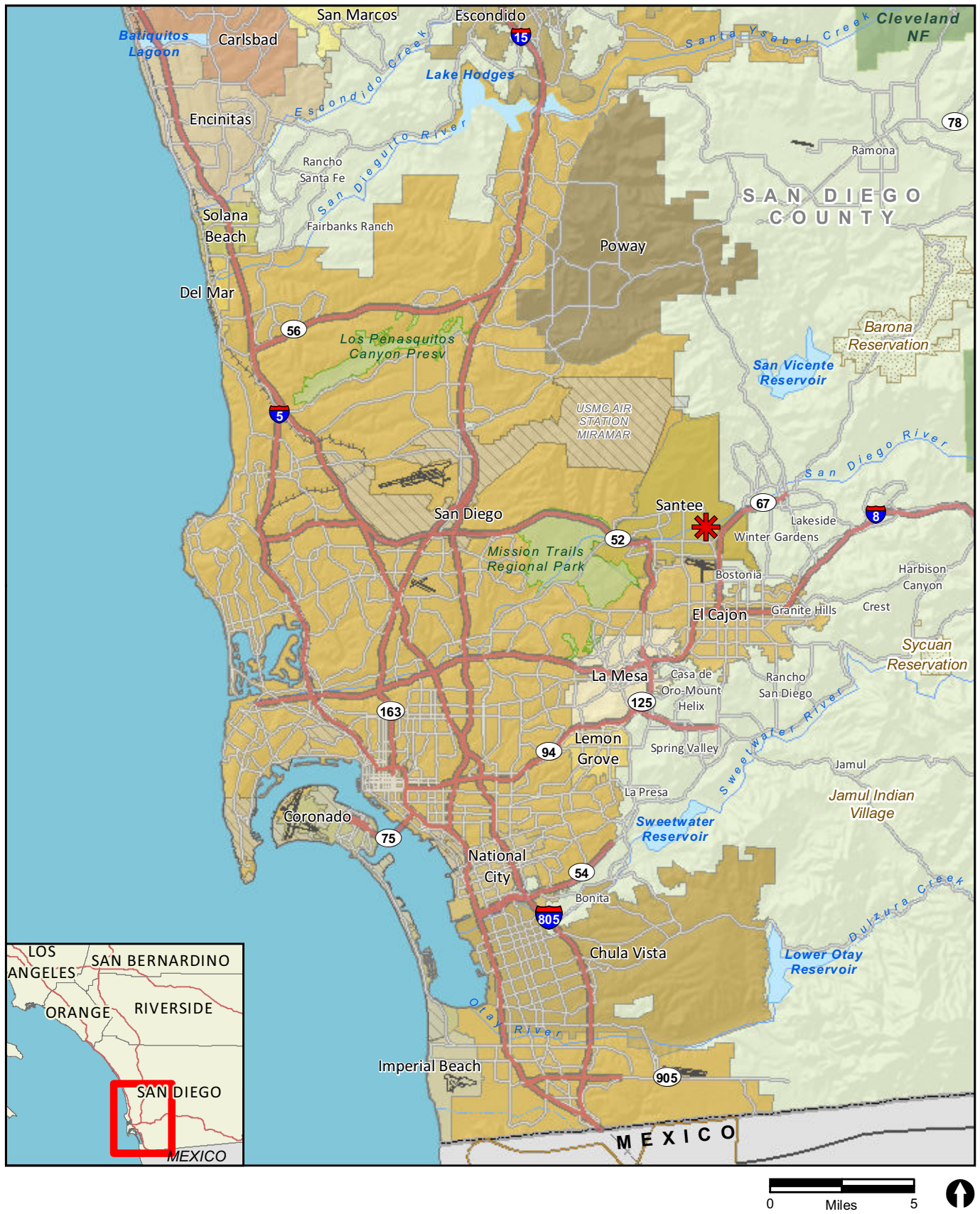
The project would consist of four separate buildings within an internal secure and open courtyard, an outdoor livestock area, an activity yard, a staff parking lot, and a public parking lot. The two parking lots would have separate driveways for ingress and egress from Riverview Parkway. The four buildings would contain medical facilities, administration areas, and boarding areas for dogs, cats, rabbits, and other small animals. Construction is anticipated to begin in November 2021 and end in January 2023. The area of potential effect (APE) is approximately 6.30 acres; however, the survey encompassed the entire parcel totaling 10.58 acres. Currently no work is proposed for the northern portion of the parcel.

1.2 Existing Conditions

1.2.1 Environmental Setting

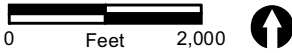
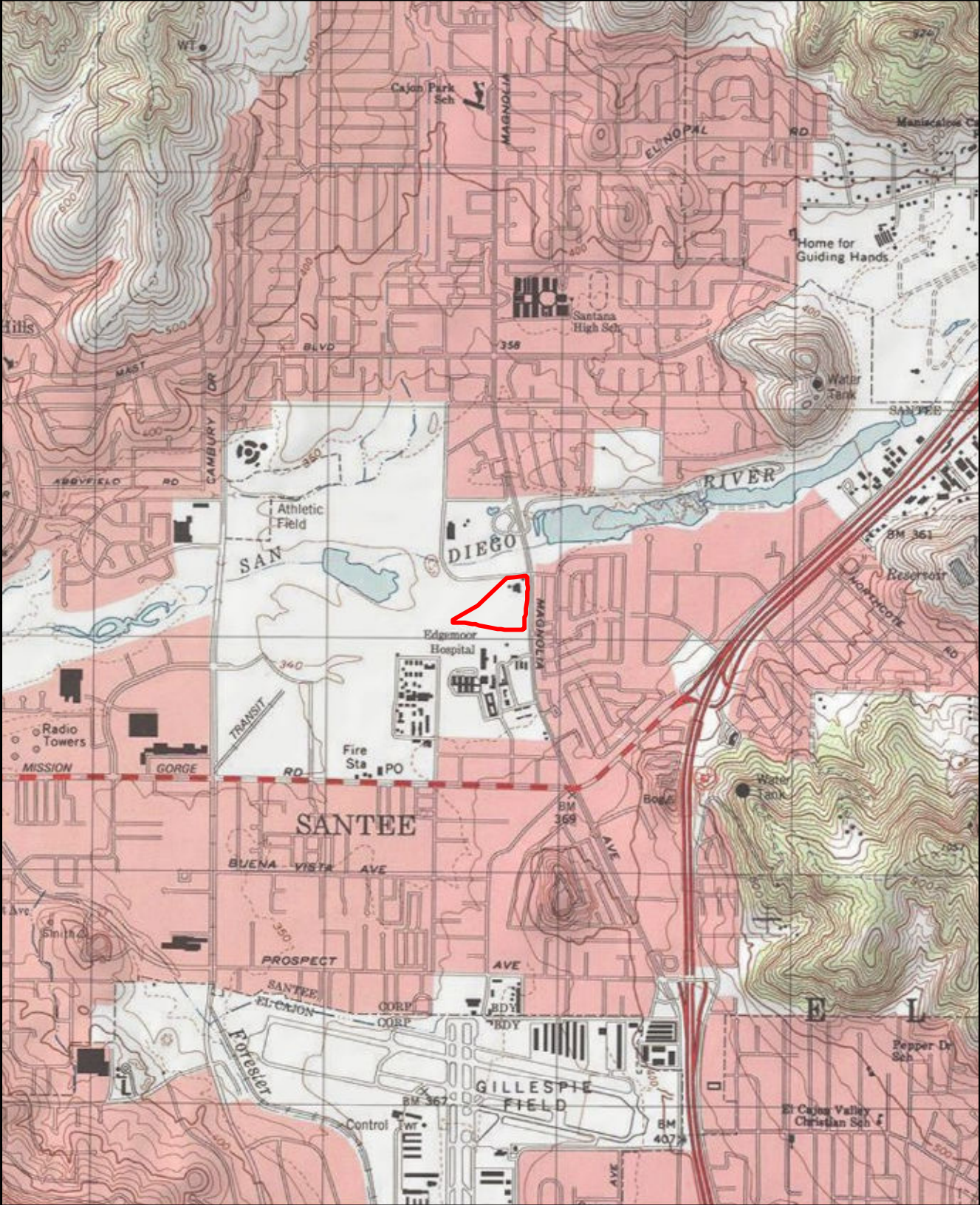
Natural Setting

The project area is located approximately 14 miles northeast of downtown San Diego, 16 miles east of the Pacific Ocean, north of the city of El Cajon in the city of Santee. Currently the project area consists of an undeveloped lot with an elevated building pad.



✱ Project Location

FIGURE 1
Regional Location




 Project Boundary

FIGURE 2
Project Location on USGS Map



- Site Plan
- ▨ Project Impact Area
- ▭ Project Boundary

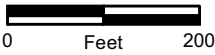


FIGURE 3
Project Location on Aerial Photograph

Based on reconnaissance and review of site topography, the proposed structural improvement area is generally flat at an approximate elevation of 350 feet above mean sea level (AMSL). Land uses surround the project area include residential subdivisions southeast of North Magnolia Avenue, residential mobile homes east of North Magnolia Avenue, Las Colinas Detention and Reentry Facility to the south, and undeveloped land. The San Diego River occurs to the west and to the north.

Two soil series are present within the project area: Visalia sandy loam (0 to 2 percent slopes) and Grangeville fine sandy loam (0 to 2 percent slopes). The majority of the soil is Visalia with the southeastern corner containing Grangeville soil. Visalia series soils are moderately well drained, very deep sandy loams that are derived from granitic alluvium. They are found on alluvial fans and floodplains. In a representative profile, the surface layer is dark grayish-brown slightly acidic sandy loam about 12 inches thick. Subsequent layers are dark grayish-brown slightly acidic sandy loams and loams in excess of 50 inches in thickness (U.S. Department of Agriculture 1973).

Grangeville series soils are somewhat poorly drained, very deep fine sandy loams derived from granitic alluvium. They are found on alluvial fans and plains. In a typical profile, the topsoil is gray-brown, moderate alkaline, calcareous, fine sandy loam approximately 11 inches in thickness. Below this is a gray-brown, moderate alkaline, calcareous, fine sandy loam approximately 23 inches in thickness. The substratum is similar, but very fine sandy loam (U.S. Department of Agriculture 1973).

Cultural Setting

The prehistoric cultural sequence in San Diego County is generally conceived as comprising three basic periods: the Paleoindian, dated between about 11,500 and 8,500 years ago and manifested by the artifacts of the San Dieguito Complex; the Archaic, lasting from about 8,500 to 1,500 years ago and manifested by the cobble and core technology of the La Jolla Complex; and the Late Prehistoric, lasting from about 1,500 years ago to historic contact (i.e., A.D. 500 to 1769) and represented by the Cuyamaca Complex. This latest complex is marked by the appearance of ceramics, small arrow points, and cremation burial practices.

Paleoindian Period

The Paleoindian Period in San Diego County is most closely associated with the San Dieguito Complex, as identified by Rogers (1938, 1939, 1945). The San Dieguito assemblage consists of well-made scraper planes, choppers, scraping tools, crescentics, elongated bifacial knives, and leaf-shaped points. The San Dieguito Complex is thought to represent an early emphasis on hunting (Warren et al. 1993:III-33).

Archaic Period

The Archaic Period in coastal San Diego County is represented by the La Jolla Complex, a local manifestation of the widespread Millingstone Horizon. This period brings an apparent shift toward a collecting economy and an emphasis on seed resources, small game, and

shellfish. The inland cultural manifestations of the Archaic Period is called the Pauma Complex. Pauma Complex sites lack the shell that dominates many La Jollan sites. Along with an economic focus on gathering plant resources, the settlement system appears to have been more sedentary. La Jollan and Pauma assemblages are dominated by rough, cobble-based choppers and scrapers, and slab and basin metates. Elko series projectile points appeared late in the period. Large deposits of marine shell at coastal sites argue for the importance of shellfish gathering to the coastal Archaic economy (True 1980).

Late Prehistoric Period

Near the coast and in the Peninsular Mountains beginning approximately 1,500 years ago, patterns began to emerge which suggest the ethnohistoric Kumeyaay. This period is characterized by higher population densities and elaborations in social, political, and technological systems. Economic systems diversify and intensify during this period, with the continued elaboration of trade networks, the use of shell-bead currency, and the appearance of more labor-intensive, but effective technological innovations. The late prehistoric archaeology of the San Diego coast and foothills is characterized by the Cuyamaca Complex. It is primarily known from the work of D. L. True (1970) at Cuyamaca Rancho State Park. The Cuyamaca Complex is characterized by the presence of steatite arrowshaft straighteners, steatite pendants, steatite comales (heating stones), Tizon Brownware pottery, ceramic figurines reminiscent of Hohokam styles, ceramic "Yuman bow pipes," ceramic rattles, miniature pottery various cobble-based tools (e.g., scrapers, choppers, hammerstones), bone awls, manos and metates, mortars and pestles, and Desert Side-Notched [more common] and Cottonwood Series projectile points).

Ethnohistory

The Kumeyaay (also known as Kamia, Ipai, Tipai, and Diegueño) occupied the southern two-thirds of San Diego County. The Kumeyaay lived in semi-sedentary, politically autonomous villages or rancherias. A settlement system typically consisted of two or more seasonal villages with temporary camps radiating away from these central places (Cline 1984). Their economic system consisted of hunting and gathering, with a focus on small game, acorns, grass seeds, and other plant resources. The most basic social and economic unit was the patrilocal extended family. A wide range of tools was made of locally available and imported materials. A simple shoulder-height bow was used for hunting. Numerous other flaked-stone tools were made, including scrapers, choppers, flake-based cutting tools, and biface knives. Preferred stone types were locally available metavolcanics, cherts, and quartz. Obsidian was imported from the deserts to the north and east. Ground stone objects include mortars and pestles typically made of locally available fine-grained granite. Both portable and bedrock types are known. The Kumeyaay made fine baskets. These employed either coiled or twined construction. The Kumeyaay also made pottery, using the paddle-and-anvil technique. Most were a plain brown utility ware called Tizon Brownware, but some were decorated (May 1978; Spier 1923).

Historic Period

San Diego was first settled by Spanish colonists in A.D. 1769, when the Mission San Diego de Alcalá and Presidio de San Diego were founded. The Spanish period (1769–1820) economy was based on cattle grazing. Missions were major population centers, and mission cattle roamed freely over open range, tended by Indian vaqueros. European contact substantially and pervasively stressed the social, political, and economic fabric of aboriginal culture (Shipek 1986, 1991). Disease, starvation, and a general institutional collapse caused emigration, birth rate declines, and high adult and infant mortality levels for the aboriginal groups in San Diego County (Shipek 1991).

The citizens of Mexico successfully revolted against the Spanish in 1821. The Mexican government secularized the missions in 1833. The U.S. took over the northern half of Mexico as a result of the Mexican–American War in 1848, and California became a state in 1850. American settlement in southern California was slow during the Gold Rush, when northern California experienced a dramatic population explosion (Rolle 1998). By the late 1800s, the County witnessed the beginning of a recognizable downtown San Diego area and the gradual development of a number of outlying communities, many of which were established around previously defined ranchos and land grants. These communities were composed of an aggregate of people who lived on scattered farmsteads tied together through a common school district, church, post office, and country store (Hector and Van Wormer 1986; Pourade 1963).

The project area was encompassed by El Cajón Rancho. El Cajón Rancho was a 48,799-acre cattle ranch used by the Spanish Catholic Church to support Mission San Diego de Alcalá until secularization in 1834 (Pourade 1969). In 1845, it was granted to Doña Maria Antonia Estudillo de Pedrorena, the wife of Don Miguel de Pedrorena who built Casa de Estudillo in Old Town. El Cajón Rancho was the third largest rancho grant in the county. During the American Civil War (1861–1865), the rancho was opened to settlement.

In 1877, George A. Cowles purchased 4,000 acres, which eventually became Santee (City of Santee 2020). Cowles purchased the property to develop vineyards. A town developed, known as Cowlestown, which was linked to the Cuyamaca Railroad. George A. Cowles died in 1887, following which, in 1891, Jennie Cowles married Milton Santee, a realtor and surveyor. In 1893, the community changed its name to Santee, which was also adopted by the school district. Hosmer McCoon purchased 9,543 acres east of the project area in 1885 and created Fanita Ranch, which was purchased in 1898 by the Scripps family (City of Santee 2020).

Santee remained a small community during the first half of the twentieth century. That changed; however, beginning in the 1950s. By 1970, the population had risen from less than 2,000 to 25,750 (City of Santee 2020). In 1980, Santee voted to incorporate.

1.2.2 Previously Recorded Sites

RECON conducted a self-search of the project area with a one-mile radius at the California Historical Resources Information System, South Coastal Information Center (Confidential Attachment 1). There have been numerous cultural resource investigations within portions

of the project area. The record search identified two historic trash scatters, one agricultural complex, six prehistoric resources, two prehistoric isolated artifacts, and one multi-component (both prehistoric and historic elements) site within the one-mile radius. Table 1 lists those sites. The prehistoric sites include bedrock milling features, hearths, human remains, as well as lithic, ground stone, ceramic, and shell scatters. One prehistoric site (CA-SDI-19370) and one prehistoric isolated artifact (P-37-028466) are recorded within the project area.

Table 1 Resources Previously Recorded within One Mile of the Project				
Primary Number	Trinomial	Site Type	Site Dimensions	Report Reference
P-37-000141	CA-SDI-000141	Unknown	Unknown	n.d (Terganza)
P-37-005148	CA-SDI-005148	Bedrock milling	10 x 5 feet	1975 (Fink)
P-37-005669	CA-SDI-005669	Hearths, cremations, lithic, ground stone, ceramic, faunal, shell scatter, shell beads	50 x 70 m (locus A); 250 x 100 m (locus B); 160 x 135 m (locus C)	2015 (Rincon); 1983 (Thesken); 1978 (Polan)
P-37-006936	CA-SDI-006936	Lithic scatter	30 x 5 m	1979 (Carrillo)
P-37-007603	CA-SDI-007603	Lithic, ground stone scatter	No longer exists	1981 (RECON); 1979 (Norwood)
P-37-009245	CA-SDI-009245	Trash scatter	30 x 30 m	1982 (Valois)
P-37-009248	CA-SDI-009248	Agricultural complex	150 x 100 m	No
P-37-025303		Isolate: flaked lithic tool	n/a	2003 (Kyle Consulting)
P-37-028466**		Isolate: flakes	n/a	2007 (RECON)
P-37-030482**	CA-SDI-019370	Lithic, ground stone scatter	100 x 300 m	2009 (Affinis)
P-37-032655	CA-SDI-020693	Trash scatter	33 x 23 m	2012 (Affinis)
P-37-032878	CA-SDI-020778	Lithic, ground stone, shell scatter, trash scatter, human remains fragments	290 x 520 m	2015 (Affinis); 2012 (Affinis)
m = meters; n/a = not available				
**Resources within the APE				

Previously Recorded Resources within the APE

CA-SDI-19370/P-37-030482

CA-SDI-19370 was recorded in 2009 during mass grading for the construction of Liberty High School. The site was recorded as a light scatter of lithic and ground stone artifacts with a metate, ten manos (seven of which were fire-affected), debitage (one quartz, one metavolanic), and one retouched flake. Artifacts were noted between two and ten feet deep in the alluvial setting adjacent to the San Diego River on a low-lying terrace. All artifacts were collected during the monitoring program and the site was destroyed during grading. The site form notes that the site may have been an extension of CA-SDI-5669, located north of the river. The site form location map has the site mapped in the upper northern part of the project area, while the sketch map has it mapped in the southern part of the project area. The sketch map is likely the accurate map.

P-37-028466

P-37-028466 was recorded in 2004 as one retouched metavolcanic flake and two secondary metavolcanic flakes within an agricultural field north of the Edgemoor Hospital complex.

1.2.3 Sacred Lands Search

RECON sent a letter on May 8, 2020, to the Native American Heritage Commission (NAHC) requesting them to search their Sacred Lands File to identify spiritually significant and/or sacred sites or traditional use areas in the project vicinity. The NAHC was also asked to provide a list of local Native American tribes, bands, or individuals who may have concerns or interests in the cultural resources of the project. The NAHC files indicated that sites have been located within the APE that may be impacted by the project. NAHC recommended contacting the Barona Group of the Capitan Grande, the Ewiiapaayp Band of Kumeyaay Indians, the Viejas Band of Kumeyaay Indians, and Kumeyaay Cultural Repatriation Committee for more information (Confidential Appendix 2). The information is confidential and should not be included in public documents.

1.3 Applicable Regulations

The project is subject to California Environmental Quality Act (CEQA) compliance.

1.3.1 California Environmental Quality Act and County of San Diego Compliance

The regulatory framework and methods for determining impacts on cultural resources include compliance with the requirements of CEQA as defined in Section 15064.5 of the CEQA Determining the Significance of Impacts to Archaeological and Historical Resources (CEQA Guidelines) and with County Guidelines for Determining Significance of Cultural Resources: Archaeological and Historic Resources (County of San Diego 2007). Both sets of guidelines require the identification of cultural resources that could be affected by the project, the evaluation of the significance of such resources, an assessment of the project impacts on significant resources, and a development of a data recovery program to avoid or address adverse effects to significant resources. Significant resources, also called historical resources, are those cultural resources (whether prehistoric or historic) that have been evaluated and determined to be eligible for listing in the California Register of Historical Resources (CRHR).

According to CEQA Section 15064.5 (a), a historical resource includes the following:

1. A resource listed in, or determined to be eligible for listing on, the California Register of Historical Resources.
2. A resource included in the local register.
3. A resource which an agency determines to be historically significant. Generally, a resource shall be considered to be “historically significant,” if the resource meets the

criteria for listing on the California Register of Historical Places (Public Resources Code Section 5024.1 Title 14 California Code of Regulations, Section 4852) including the following:

- A. Is associated with events that have made a significant contribution to the broad patterns of California's history or cultural heritage;
 - B. Is associated with the lives of persons important in our past;
 - C. Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of an important creative individual, or possesses high artistic values; or
 - D. Has yielded, or maybe likely to yield, information important to prehistory or history.
4. The fact that a resource is not listed in or determined to be eligible for listing in the CRHR or a local register does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code Sections 5020.1(j) or 5024.1.

A resource must meet one of the above criteria and must have integrity; that is, it must evoke the resource's period of significance or, in the case of criterion D, it may be disturbed, but it must retain enough intact and undisturbed deposits to make a meaningful data contribution to regional research issues. Most archaeological sites typically qualify for listing under criterion D.

San Diego County Local Register of Historical Resources includes resources with any of the following criteria:

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.

2.0 Guidelines for Determining Significance

Section 4.2 of the County Guidelines for Determining Significance of Cultural Resources: Archaeological and Historic Resources (County of San Diego 2007) indicate that 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 Section 15064.5 of the state CEQA 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 the Interior Standards.
2. The project causes a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the state CEQA Guidelines. This shall include the destruction or disturbance of an important archaeological site or any portion of an important archaeological site that contains or has the potential to contain information important to history or prehistory.
3. The project disturbs any human remains, including those interred outside of formal cemeteries.
4. The project proposes activity or uses damaging to significant cultural resources as defined by the Resource Protection Ordinance and fails to preserve those resources.

3.0 Analysis of Project Effects

3.1 Methods

3.1.1 Survey Methods

The primary goals of this survey were to systematically survey the project area to relocate and update previously recorded sites and isolates and locate and record any newly identified cultural resources. RECON archaeologist Carmen Zepeda-Herman accompanied by Gabe Kitchen from Red Tail Environmental conducted the on-foot survey of the APE on March 11, 2020, using 15-meter transects. The survey area was inspected for evidence of archaeological materials such as debris, flaked and ground stone tools, ceramics, milling features, and human remains. The survey area was photographed to document environmental setting, identifying surrounding landmarks, and general conditions.

3.1.2 Native American Participation

Native American participation was required per the County's Report Format and Content Requirements (County of San Diego 2007) during the survey. Gabe Kitchen from Red Tail

Environmental participated as Native American monitor. The County Department of General Services conducted Assembly Bill 52 consultation. They sent letters to the Barona, Campo, Ewiiapaayp, Iipay (Santa Ysabel), Inaja-Cosmit, Jamul, Kwaaymii, La Posta, Manzanita, Mesa Grande, San Pasqual, Sycuan, and Viejas Tribes. The Barona, Jamul, San Pasqual, and Viejas Tribes requested formal consultation.

3.2 Results

3.2.1 Survey

The survey resulted in finding no cultural resources. Ground visibility varied from 10 to 70 percent, with the exception of the northeast corner (Photograph 1). Due to a thick leaf duff, visibility was zero in the northeast corner. Short grasses covered the majority of the survey area with some native vegetation concentrated in the southwestern corner (Photograph 2). A drainage swale along the western end was clear of vegetation and contained numerous cobbles.

RECON did not locate the previously recorded isolated artifact (P-37-028466) or site CA-SDI-19370. Both the site and isolated artifact were located within an area that has been previously graded during construction for a high school that was not completed. The southern portion of the parcel was graded and an elevated pad was created on part of the west side, confirming that the site form sketch map for CA-SDI-19370 is correct (Photograph 3).

The southern portion of the project area contained many rounded cobbles. Road gravel was noted on the east side. A number of dug out areas were also noted throughout the southern half of the project area (Photograph 4). Soils from these and backdirt from rodent holes were inspected for artifacts. A dirt road runs in a northeast-southwest direction from the southwest corner before turning east and then northwest. A small drainage swale with some cobbles runs approximately 87 meters along the southeast side of this road starting from the southwest corner of the project area. A smaller road runs east-west closer to the northern end of the project area.

The northeast corner contained a number of eucalyptus trees often associated with residential homes (Photograph 5). This was confirmed by review of a historic aerial photograph from 1980 that shows some type of building in that corner. The building continues in the 1981, 1989, 1994, 1996, 2002, 2003, 2005, 2009, and 2010 photographs. By the 2012 photograph, the building appears to be removed. The trees first appear in the 1989 photograph and continue until present. The northeast/southwest road first appears in the 2009 aerial photograph and coincides with when grading for the school occurred. This road is widened to its current alignment in the 2012 photograph. The remainder of the project area appears to have been used for agriculture from 1953 through at least 1980 (Nationwide Environmental Title Research LLC 2020).



PHOTOGRAPH 1
Overview of Ground Visibility from the Southeast Corner,
Looking Northwest



PHOTOGRAPH 2
Overview of West Portion of the Project Area, Looking West-Northwest



PHOTOGRAPH 3
View from Elevated Pad, Looking East-Northeast



PHOTOGRAPH 4
Sample of One of the Excavated Areas



PHOTOGRAPH 5
Northeast Corner of the Project Area, Looking West

3.2.2 Native American Consultation

DGS conducted Assembly Bill 52 consultation with the Barona, Jamul, San Pasqual, and Viejas Tribes. Results of the tribal consultations can be found in Table 2.

Table 2 Tribal Consultation Results			
Tribe	AB-52/ Sacred Lands	Contact Record	Final Consultation Determination
Barona	Both	Mailed Letter April 1, 2020 Received response April 14, 2020 Barona Quarterly Consultation Meeting May 8, 2020 <ul style="list-style-type: none"> • Discussed project • Provided Cultural Report via E-mail to Art Bunce • Requested monitoring Meeting August 7, 2020 <ul style="list-style-type: none"> • Further discussed project + curation • Confirmed monitoring as mitigation feasible • No sacred lands on site • Agreed to conclude 	Concluded August 7, agreed that cultural monitoring during grading activities would be required.
Campo	Both	Mailed Letter April 1, 2020	No Consultation Requested
Ewiiapaayp	Sacred Lands	Mailed Letter April 1, 2020	No Consultation Requested
Iipay (Santa Ysabel)	Both	Mailed Letter April 1, 2020	No Consultation Requested
Inaja-Cosmit	Sacred Lands	Mailed Letter April 1, 2020	No Consultation Requested
Jamul	Both	Meeting May 27, 2020 <ul style="list-style-type: none"> • Discussed project • Jamul requested monitoring • County provided cultural report Meeting August 21, 2020 <ul style="list-style-type: none"> • Further discussed project + curation • No sacred lands information • Cultural monitoring agreed to • Concluded consultation 	Concluded August 21, agreed that cultural monitoring during grading activities would be required.
Kwaaymii	Both	Mailed Letter April 1, 2020	No Consultation Requested
LaPosta	Sacred Lands	Mailed Letter April 1, 2020	No Consultation Requested
Manzanita	Both	Mailed Letter April 1, 2020	No Consultation Requested
Mesa Grande	Sacred Lands	Mailed Letter April 1, 2020	No Consultation Requested
San Pasqual	Both	Meeting March 25, 2020 <ul style="list-style-type: none"> • Request for Kumeyaay Native American Monitor • DGS to send final Cultural Report when received • Mailed Letter April 1, 2020 • Received formal response April 13 Meeting August 27, 2020 <ul style="list-style-type: none"> • Discussed project + curation • E-mail sent September 11, 2020 • Provided additional requested information Meeting November 25, 2020 <ul style="list-style-type: none"> • Anticipated meeting • Conclusion anticipated at this meeting 	Consultation still open, will follow-up but anticipate conclusion no later than November 25
Sycuan	Both	Mailed Letter April 1, 2020	No Consultation Requested

Table 2
Tribal Consultation Results

Tribe	AB-52/ Sacred Lands	Contact Record	Final Consultation Determination
Viejas	Both	Mailed Letter April 1, 2020 Received formal request for consultation on April 1, 2020 Meeting June 16, 2020 <ul style="list-style-type: none"> Discussed project Agreed to cultural monitoring Consultation concluded 	Concluded June 16th, agreed that cultural monitoring during grading activities would be required.

4.0 Interpretation of Resource Importance and Impact Identification

4.1 Resource Importance

This section does not apply because CA-SDI-19037 has been graded away. It does not qualify for the San Diego County Local Register or the CRHR. This section also does not apply to P-37-028466 because isolates generally lack qualities that would qualify them for listing in the local Register or CRHR.

4.2 Impact Identification

Specific guidance was from Section 4.2, County Guidelines for Determining Significance of Cultural Resources: Archaeological and Historic Resources (County of San Diego 2007). Pursuant to the County of San Diego Guidelines for Determining Impact Significance—Cultural Resources (2007), any of the following will be considered a significant impact to cultural resources:

1. The project causes a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the State CEQA 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 the Interior Standards.
 - There are no historic-era resources within the project APE; therefore, project impacts would not be significant.
2. The project causes a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the state CEQA Guidelines. This shall include the destruction or disturbance of an important archaeological site or any portion of an important archaeological site that contains or has the potential to contain information important to history or prehistory.
 - There are no known archaeological resources within the southern part of the parcel; therefore, project impacts would not be significant.

- Should the northern portion of the parcel be developed in the future, there is a potential for significant impacts to unknown subsurface archaeological deposits, such as an intact feature or soil stratum, during construction. Project impacts to unknown subsurface deposits would be significant and mitigable to below a level of significance.
3. The project disturbs any human remains, including those interred outside of formal cemeteries.
- No human remains were encountered during past grading in the project area, specifically the southern part of the parcel.
 - Should development be proposed in the future for the northern part of the parcel, there is a chance of encountering buried human remains within the alluvial deposits of the San Diego River. According to the records search, past projects in the vicinity have encountered human remains. A future project may result in significant impacts to human remains.
 - Based on the Sacred Lands Search, there are tribal cultural resources within the project vicinity.

5.0 Management Considerations

5.1 Mitigated Impacts for Tribal Cultural Resources

As noted above, the project will not result in direct impacts to historical or archaeological resources. The Sacred Lands Search was positive, and a Native American monitor was requested through AB 52 consultation. Therefore, RECON recommends implementation of a Grading Monitoring Program for the southern portion of the parcel. The County shall provide evidence that a County-certified archaeologist (to be on-call) and Native American Kumeyaay monitor has been contracted to implement a Grading Monitoring Program. The consulting archaeologist shall contract with a Native American Kumeyaay monitor to be involved with the Grading Monitoring Program. A letter of proof indicating that a Native American Kumeyaay Monitor has been contracted shall be prepared by the consulting archaeologist and submitted to the Director of the County Department of General Services.

The Grading Monitoring Program would require both the archaeological and Native American Kumeyaay monitor to attend a pre-construction meeting. Only a Native American Kumeyaay monitor would be required to be present during ground-disturbing activities. In the event that previously unidentified potentially significant cultural resources are discovered, the Native American Kumeyaay monitor shall have the authority to divert or temporarily halt ground disturbance operation in the area of discovery until such time that the sensitivity of the resource can be determined. The Native American Kumeyaay monitor shall notify the archaeologist and County to determine if the discovery is a significant resource. Significant archaeological discoveries include intact features, stratified deposits, and human remains. In order to mitigate potential impacts to significant cultural resources,

a Monitoring Discovery and Historic Properties Treatment Plan shall be prepared and implemented to the satisfaction of the Director of the County Department of General Services. The Monitoring Discovery and Historic Properties Treatment Plan shall apply to the treatment of cultural or historic resources once they are discovered.

If human remains are discovered, work shall halt in that area and the procedures set forth in the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) will be followed. The archaeologist shall contact the County Coroner and the County.

After the completion of grading monitoring, the archaeologist shall complete and submit an appropriate final report that documents the results, analysis, and conclusions of all phases of the Grading Monitoring Program, to the satisfaction of the Director of the County Department of General Services. If no significant resources are discovered, a brief letter shall be prepared. If significant resources are discovered, a report with the results of the monitoring and treatment plan shall be prepared.

5.2 Future Mitigated Impacts

Should development be proposed for the northern portion of the parcel, direct impacts may occur to unknown significant subsurface archaeological deposits during construction. Mitigation measures are recommended in the next section to avoid inadvertently impacting any undiscovered significant archaeological features.

5.2.1 Future Mitigation Measures

Direct impacts to the northern part of the parcel can be mitigated to a level below significant through implementation of a Construction Monitoring Program during construction. Implementation of these measures would mitigate impacts to unknown buried deposits.

Construction Monitoring Program

The Construction Monitoring Program would mitigate potential impacts to undiscovered significant archaeological resources. The Construction Monitoring Program would include the following:

- A letter signed by the Principal Investigator indicating that a County-certified project archaeologist and a Native American monitor have been contracted to implement the construction monitoring program should be submitted to the County Department of General Services.
- The Construction Monitoring Program would require both archaeological and Native American monitors to attend a pre-construction meeting and to be present during ground-disturbing activities. The frequency of inspections would be determined by the project archaeologist in consultation with the Native American monitor and would

vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features.

- If previously unidentified potentially significant cultural resources are discovered, construction activities would be diverted away from the discovery and the resources evaluated for significance. Isolates and non-significant deposits would be minimally documented in the field. Significant archaeological discoveries include intact features, stratified deposits, previously unknown archaeological sites, and human remains. The Principal Investigator would inform the County Archaeologist of the discovery and together determine its significance. To mitigate potential impacts to significant cultural resources, a Data Recovery Program for any newly discovered cultural resource would be prepared by the Principal Investigator, approved by the County archaeologist, and implemented using professional archaeological methods. Construction activities would be allowed to resume after the completion of the recovery of an adequate sample and the recordation of features.
- All cultural material collected during the Construction Monitoring and Data Recovery Programs would be processed and curated at a San Diego County facility that meets federal standards per 36 Code of Federal Regulations Part 79 unless the tribal monitors request the collection.
- If human remains are discovered, work shall halt in that area and the procedures set forth in the California Public Resources Code (Section 5097.98) and State Health and Safety Code (Section 7050.5) will be followed. The Principal Investigator shall contact the County Coroner.
- After the completion of the monitoring program, an appropriate report shall be prepared. If no significant cultural resources are discovered, a brief letter shall be prepared. If significant cultural resources are discovered, a report with the results of the monitoring and data recovery (including the interpretation of the data within the research context) shall be prepared.

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7.0 List of Preparers and Persons/Organization Contacted

7.1 Project Participants

7.1.1 RECON Environmental, Inc.

Carmen Zepeda-Herman	Principal Investigator and Author
Frank McDermott	GIS/UAV Coordinator
Jennifer Gutierrez	Production Specialist

7.1.2 Red Tail Environmental

Gabe Kitchen	Native American monitor
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7.2 Organization Contacted

South Coastal Information Center, records search

CONFIDENTIAL ATTACHMENT

(Not for Public Review)