Appendix G

Cultural Resources Evaluation of Prehistoric Archaeological Site CA-SDI-21808 for the Bear Valley Parkway Development (June 2016)



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Cultural Resources Evaluation of Prehistoric Archaeological Site CA-SDI-21808 for the Bear Valley Parkway Development, Escondido, California

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TABLE OF CONTENTS

Chapter

Page

MA	NAGEMENT SUMMARY	iii
1.	INTRODUCTION	1
2.	SETTING AND BACKGROUND. MODERN CONDITIONS Geography Geology and Soils Biology CULTURAL BACKGROUND . Prehistoric Archaeology. Ethnographic Evidence. History RECORDS SEARCH RESULTS . Previous Studies . Previously Recorded Sites. NATIVE AMERICAN CORRESPONDENCE.	5 5 5 5 5 5 5 5 5
3.	RESEARCH DESIGN AND METHODS RESEARCH DESIGN FOR EVALUATION EVALUATION FIELD METHODS	 15 15 15
4.	EVALUATION RESULTS	 16 16
5.	CONCLUSIONS AND MANAGEMENT RECOMMENDATIONS	23 23 24 24 24 25
RE	FERENCES	27
AP	PENDICES	35
	CONFIDENTIAL APPENDIX A. DPR Site Record Update for CA-SDI-21808	

LIST OF FIGURES

Page

Figure 1.	Bear Valley Parkway Residential Development Project vicinity map.	1
Figure 2.	Bear Valley Parkway Residential Development Project location map	2
Figure 3.	Proposed grading exemption plan for the Bear Valley Parkway Residential	
	Development Project.	3
Figure 4.	Sketch map of SDI-21808 showing the site boundary and the location of the bedrock	
•	outcrops and milling features associated with the site.	17
Figure 5.	Southeast-facing overview of SDI-21808.	18
Figure 6.	Bedrock Milling Feature 1 associated with SDI-21808. The milling slick is located just	
-	left of the north arrow.	19
Figure 7.	Bedrock Milling Feature 2 associated with SDI-21808. The milling slick is located to	
-	the right of the north arrow	19
Figure 8.	Bedrock Milling Feature 1 sketch map.	20
Figure 9.	Bedrock Milling Feature 2 sketch map.	21

LIST OF TABLES

Page

Table 1.	Cultural Resource Reports Addressing Areas intersecting the Project Area	. 12
Table 2.	Previously Recorded Cultural Resources within a 1-mi. Radius of the Project Area	. 13
Table 3.	Native American Contacts	. 14
Table 4.	Results of STP Excavations at SDI-21808	. 16

MANAGEMENT SUMMARY

ASM Affiliates, Inc. (ASM) was subcontracted by Harris and Associates to conduct a Phase II archaeological evaluation of the site SDI-21808 associated with a proposed residential development project located within the property addressed as 661 Bear Valley Parkway in Escondido, California. This work was conducted to assist in compliance with the California Environmental Quality Act (CEQA), Section 106 of the National Historic Preservation Act (NHPA), and local regulations in the city of Escondido.

The investigation included a records search of the project area and a 1-mi. radius surrounding from the South Coastal Information Center (SCIC) of the California Historical Resources Information System (CHRIS), a search of the Sacred Lands Files at the Native American Heritage Commission (NAHC), and an evaluation of the significance of the SDI-21808 site for the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR). The evaluation of the SDI-21808 site was conducted on June 1, 2016.

During the previously completed pedestrian survey, ASM archaeologists identified one prehistoric site consisting of two separate milling features, each with one milling slick. A California Department of Parks and Recreation (DPR) form recording the site attributes was submitted to the SCIC, and the site has been assigned the trinomial CA-SDI-21808. During the previous examination of the site, no artifacts were located on the surface. Thus, a primary objective of the current evaluation testing was to determine if subsurface archaeological deposits are present at the site.

All field notes pertaining to the data collected during the current investigation are housed at ASM's Carlsbad office. Site records were submitted to the SCIC.

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1. INTRODUCTION

ASM Affiliates, Inc. (ASM) was contracted by Harris and Associates to conduct a Phase II archaeological evaluation of the environment associated with a proposed residential development project located within the property addressed as 661 Bear Valley Parkway in Escondido, California. This work was conducted to assist in compliance with the California Environmental Quality Act (CEQA), Section 106 of the National Historic Preservation Act (NHPA), and local regulations in the city of Escondido.

The project area is located in the city of Escondido, San Diego County, California (Figure 1). Figure 2 shows the location of the project area as drawn on the 7.5-minute USGS Escondido quadrangle within an unsectioned portion of Township 12 South, Range 2 West. The proposed project consists of the subdivision of 40.9 acres into 55 residential lots, two private street lots, seven open-space lots, and one recreation lot (Figure 3). Each of the residential lots will contain a minimum area of 10,000 ft.². Private open space will occupy 19.47 acres of the 40.9 acre project area, and will include any environmental mitigation and buffer areas related to upland or wetland habitat, as well as two drainage basins to improve the quality of storm water crossing and exiting the site. Access to the project area from Bear Valley Parkway is proposed at the intersection of Zlatibor Ranch Road and Bear Valley Parkway. A secondary, gated emergency access road will be provided between the main access point and the intersection of Encino Drive and Bear Valley Parkway. The project includes a proposed Specific Alignment Plan for an alternative standard for Bear Valley Parkway (classified as a Major Road), as well as frontage improvements to include curb, gutter, sidewalk, parkway, and bike lane. The pedestrian walkway system inside the project area will tie into the public Bear Valley Parkway sidewalk system.

For the archaeological and historical investigations presented in this report, Mark Becker served as Project Manager, James Daniels served as the Principal Investigator, Doug Drake served as Field Director, Charles Dickerson served as Field Technician, and Shelly Nelson served as the Native American monitor.







Figure 2. Bear Valley Parkway Residential Development Project location map.



Figure 3. Proposed grading exemption plan for the Bear Valley Parkway Residential Development Project.

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2. SETTING AND BACKGROUND

This section provides a brief summary of the current conditions of the project area and a general description of both the natural and cultural environments in which archaeological resources were created and used in the surrounding project vicinity. The results of the records search conducted are also discussed, along with the results of correspondence with the Native American Heritage Commission (NAHC).

MODERN CONDITIONS

The existing conditions of the project area consist of highly disturbed soils. The project area was mined for gold in the early 1900s and then subsequently used for agricultural grove purposes before the use was abandoned approximately 20 years ago. There is one existing residential structure on the site that would be demolished to accommodate the project.

Geography

The 40.9-acre project area is located in the lower chaparral biotic zone in the Peninsular Ranges of southern California. Elevations in the project area range from approximately 525 ft. (~160 m) to 675 ft. (~206 m) above sea level, and the area is situated between two drainages that run north-south along Bear Valley Parkway and d Canyon Road. The project vicinity is bounded to the west by developed portions of the city of Escondido, with Lake Hodges to the south and the San Dieguito River to the east.

Geology and Soils

The project area lies within the southern California Peninsular Ranges. The geology of the area consists of plutonic rocks, consisting of Mesozoic granite, adamellite, granodiorite, tonalite, and diorite (Rogers 1965). The soils in the area consist of Fallbrook sandy loam, 9 to 15 percent slopes, eroded (FaD2); Fallbrook sandy loam, 15 to 30 percent slopes, eroded (FaE2); Ramona sandy loam, 2 to 5 percent slopes (RaB); Ramona sandy loam, 9 to 15 percent slopes, eroded (RaD2); and Steep gullied land (StG) (USDA 2013).

Biology

The project area is within the ecological section of southern California mountains and valleys, and more specifically within the western granitic foothills subsection (M262Bn). The predominant plant communities in this region consist of mixed chaparral shrub lands, coastal sagebrush series, coast live oak series, and chamise series. The fauna in the mammalian class include or once included mule deer, pronghorns, bighorn sheep, coyotes, bobcats, mountain lions, ground squirrels, and kangaroo rats. Birds in the region include hawks, eagles, owls, quail, mourning dove, mockingbird, jays, gulls, herons, crows, finches, and sparrows (Digital-Desert n.d.).

CULTURAL BACKGROUND

Prehistoric Archaeology

Archaeological investigations in southern California have documented a diverse range of human adaptations extending from the late Pleistocene up to the time of European contact (e.g., Erlandson and Colten 1991; Erlandson and Glassow 1997; Erlandson and Jones 2002; Jones and Klar 2007; Moratto 1984). To describe and discuss this diversity, local investigators have proposed a variety of different chronologies and conceptual categories (periods, horizons, stages, phases, traditions, cultures, peoples, industries, complexes, and patterns), often with confusingly overlapping or vague terminology.

2. Setting and Background

The prehistory of San Diego County is most frequently divided chronologically into three or four major periods. An Early Man stage, perhaps dating back tens of thousands of years, has been proposed. More generally accepted divisions include a Terminal Pleistocene/Early Holocene period (ca. 12,000-6000 B.C.) (Paleo-Indian stage; Clovis and San Dieguito patterns), a Middle/Late Holocene period (ca. 6000 B.C.-A.D. 800) (Archaic stage; La Jolla, Millingstone, Encinitas, and Pauma patterns), and a Late Prehistoric period (ca. A.D. 800-1769) (Archaic stage; San Luis Rey, Palomar, and Peninsular patterns).

Hypothetical Early Man (pre-ca. 12,000 B.C.)

The antiquity of human occupation in the New World has been the subject of considerable interest and debate for more than a century. At present, the most widely accepted model is that humans first entered portions of the western hemisphere lying to the south of Alaska between about 15,000 and 12,000 B.C., either along the Pacific coastline or through an ice-free corridor between the retreating Cordilleran and Laurentide segments of the continental glacier in Canada, or along both routes. While there is no generally accepted evidence of human occupation in coastal southern California prior to about 11,000 B.C., ages estimated at 48,000 years and even earlier sometimes have been reported (e.g., Bada et al. 1974; Carter 1980). However, despite intense interest and the long history of research, no widely accepted evidence of human occupation of North America dating prior to about 12,000 B.C. has emerged.

Local claims for Early Man discoveries have generally been based either on the apparent crudeness of the lithic assemblages that were encountered or on the finds' apparent Pleistocene geological contexts (Carter 1957, 1980; Minshall 1976, 1989; Reeves et al. 1986). The amino acid racemization technique was used in the 1970s and early 1980s to assign Pleistocene ages to coastal southern California sites (Bada et al. 1974), but the technique's findings have been discredited by more recent accelerator mass spectrometry (AMS) radiocarbon dating (Taylor et al. 1985).

Terminal Pleistocene/Early Holocene Period (ca. 12,000-6000 B.C.)

The earliest chronologically distinctive archaeological pattern recognized in most of North America is the Clovis pattern. Dated to around 11,500 B.C., Clovis assemblages are distinguished by fluted projectile points and other large bifaces, as well as extinct large mammal remains. At least three isolated fluted points have been reported within San Diego County, but their occurrence is very sparse and their dating and contexts are uncertain (Davis and Shutler 1969; Kline and Kline 2007; Rondeau et al. 2007).

The most widely recognized archaeological pattern within this period is termed San Dieguito and has been dated from at least as early as 8500 B.C. to perhaps around 6000 B.C. (Rogers 1966; True and Bouey 1990; Warren 1966; Warren et al. 2008). The San Dieguito pattern was originally defined near the central coast of San Diego County, and its presence has been reported through extensive areas to the east, but few traces are recognized on or near the northern coast of San Diego County. Proposed characteristics to distinguish San Dieguito flaked lithic assemblages include large projectile points (Lake Mojave, Silver Lake, and other, less diagnostic forms), bifaces, crescents, scraper planes, scrapers, hammers, and choppers. The San Dieguito technology involved well-controlled percussion flaking and some pressure flaking.

Malcolm Rogers (1966) suggested that three successive phases of the San Dieguito pattern (San Dieguito I, II, and III) could be distinguished in southern California, based on evolving aspects of lithic technology. However, subsequent investigators have generally not been able to confirm such changes, and the phases are not now generally accepted.

A key issue has concerned ground stone, which was originally suggested as having been absent from San Dieguito components but has subsequently been recognized as occurring infrequently within them. It was initially suggested that San Dieguito components, like other Paleo-Indian manifestations, represented the products of highly mobile groups that were organized as small bands and focused on the hunting of large game. However, in the absence of supporting faunal evidence, this interpretation has increasingly been

called into question, and it has been suggested that the San Dieguito pattern represented a more generalized, Archaic-stage lifeway, rather than a true Paleo-Indian adaptation.

A vigorous debate has continued for several decades concerning the relationship between the San Dieguito pattern and the La Jolla pattern that succeeded it and that may have also been contemporaneous with or even antecedent to it (e.g., Gallegos 1987; Warren et al. 2008). The initial view was that San Dieguito and La Jolla represented the products of distinct ethnic groups and/or cultural traditions (e.g., Rogers 1945; Warren 1967, 1968). However, as early Holocene radiocarbon dates have been obtained for site components with apparent La Jolla characteristics (shell middens, milling tools, and simple cobble-based flaked lithic technology), an alternative interpretation has gained some favor: that the San Dieguito pattern represented a functional pose related in particular to the production of bifaces, and that it represents activities by same people who were responsible for the La Jolla pattern (e.g., Bull 1987; Hanna 1983).

Middle/Late Holocene Period (ca. 6000 B.C.-A.D. 800)

Archaeological evidence from this period in the San Diego region has been characterized as belonging to the Archaic stage, Millingstone horizon, Encinitas tradition, or La Jolla and Pauma patterns (Moratto 1984; Rogers 1945; Sutton and Gardner 2010; True 1958, 1980; True and Beemer 1982; True and Pankey 1985; Wallace 1955; Warren 1968; Warren et al. 1961). Adaptations during this period apparently emphasized gathering, in particular the harvesting of hard plant seeds, as well as small-game hunting. Distinctive characteristics of the La Jolla pattern include extensive shell middens, portable ground stone metates and manos, crudely flaked cobble tools, occasional large expanding-stemmed projectile points (Pinto and Elko forms), and flexed human burials. The inland Pauma pattern has variously been interpreted as a separate culture that was broadly similar to the contemporaneous La Jolla pattern on the coast or as a different functional pose of the same culture.

Investigators have called attention to the apparent stability and conservatism of the La Jolla pattern throughout this long period, as contrasted with less conservative patterns observed elsewhere in coastal southern California (Hale 2009; Sutton 2010; Sutton and Gardner 2010; Warren 1968). However, distinct chronological phases within the pattern have also been suggested, based on changes in the flaked lithic and ground stone technologies, the shellfish species targeted, and burial practices (Harding 1951; Moriarty 1966; Rogers 1945; Shumway et al. 1961; Sutton and Gardner 2010; Warren 1964; Warren et al. 2008).

Late Prehistoric Period (ca. A.D. 800-1769)

A Late Prehistoric period in San Diego County has been distinguished, primarily on the basis of three major innovations: the use of small projectile points (Desert Side-notched, Cottonwood triangular, and Dos Cabezas forms), associated with the adoption of the bow and arrow in place of the atlatl as a primary hunting tool and weapon; brownware pottery, presumably supplementing the continued use of basketry and other containers; and the practice of human cremation in place of inhumation. Uncertainty remains concerning the exact timing of these innovations, and whether they appeared simultaneously or sequentially (e.g., Griset 1996; Yohe 1992).

Labels applied to the archaeological manifestations of this period include San Luis Rey, Palomar, and Peninsular (Meighan 1954; Sutton 2011; True 1970; True et al. 1974, 1991; Waugh 1986). These remains have generally been associated with the ethnohistorically known Luiseño, Cupeño, and Cahuilla and have been seen as perhaps marking the initial local appearance of those groups in a migration from the north. Traits characterizing the Late Prehistoric period include greater reliance on acorns as an abundant but labor-expensive food resource, a greater emphasis on hunting of both large and small game (particularly deer and rabbits), a greater amount of interregional exchange (seen notably in more use of obsidian), more elaboration of nonutilitarian culture (manifested in more frequent use of shell beads, decorated pottery and rock art), and possibly denser regional populations. Settlement may have become more sedentary during this period, as compared with the preceding period.

Ethnographic Evidence

In ethnohistoric times, northern San Diego County was occupied by speakers of the closely related Luiseño, Cupeño, and Cahuilla languages. Luiseño territory extended from Agua Hedionda Lagoon, Escondido, and Lake Henshaw northward into southern Orange and Riverside counties. The Cupeño occupied a relatively small territory in the vicinity of Warner's Ranch. The extensive Cahuilla lands extended east from Luiseño territory into the Colorado Desert and north as far as San Gorgonio Pass. To the south lay the territory of the unrelated Kumeyaay (Diegueño, Ipai) (Heizer 1978; Kroeber 1925).

Linguistic evidence links Luiseño, Cupeño, and Cahuilla with the Uto-Aztecan family of languages (e.g., Golla 2007; Laylander 2010). A hierarchy of relationships within that family likely mirror a sequence of separations reflecting territorial expansions or migrations, leading the linguistic ancestors of the Luiseño, Cupeño, and Cahuilla from a still-debated Uto-Aztecan homeland to a northern Uto-Aztecan base somewhere in western North America and ultimately south to their ethnohistoric homes. Splits within the ancestral family included the differentiation of Takic (also termed Southern California Shoshonean) (ca. 1000 B.C.?), the separation of Luiseño from Cahuilla-Cupeño (ca. A.D. 1?), and the separation of Cahuilla and Cupeño (ca. A.D. 1000?).

While Luiseño, Cupeño, and Cahuilla cultural patterns, as recorded subsequent to European contact, cannot necessarily be equated with Late Prehistoric patterns, at a minimum they provide indispensable clues to cultural elements that would be difficult or impossible to extract unaided from the archaeological record alone. A few important ethnohistoric accounts are available from Franciscan missionaries and others (Geiger and Meighan 1976; Harrington 1933, 1934; Henshaw 1972; Laylander 2000). Many accounts by ethnographers, primarily recorded during the early and middle twentieth century, are available (Bean 1972, 1978; Bean and Shipek 1978; Bean and Smith 1978; Drucker 1937; Gifford 1918; Hicks 1963; Hooper 1920; Kroeber 1908, 1925; Laylander 2004; Sparkman 1908; Strong 1929; White 1953, 1957, 1963).

The Luiseño, Cupeño, and Cahuilla inhabited a diverse environment that included littoral, valley, foothill, mountain, and desert resource zones. Because of the early incorporation of coastal Luiseño into the mission system, most of the available twentieth-century ethnographic information relates to inland groups that lived in the Peninsular Range and the Colorado Desert. Acorns were a key resource for inland groups, but a wide range of other mineral, plant, and animal resources were exploited (Bean and Saubel 1972; Sparkman 1908). Some degree of residential mobility seems to have been practiced; one classic fission/fusion pattern involved annual seasonal shifts between consolidated winter and spring settlements in the upper San Luis Rey River valley and smaller, dispersed groups living on Palomar Mountain in the summer and fall (Oxendine 1983). The fundamental Luiseño social units above the family were patrilineal, patrilocal clans, the latter ideally coinciding with the winter-spring village communities. The Cahuilla and Cupeño also had patrilineal Coyote and Wildcat moieties, serving primarily to impose exogamous marriage and to conduct ceremonies. Hereditary leaders performed ceremonial, advisory, and diplomatic functions, rather than judicial, redistributive, or military ones. There seems to have been no national level of political unity among the Luiseño or Cahuilla, and perhaps little sense of commonality within the language group.

Luiseño, Cahuilla, and Cupeño material culture was effective, but it was not highly elaborated. Structures included houses with excavated floors, ramadas, sweathouses, ceremonial enclosures, and acorn granaries. Hunting equipment included bows and arrows, curved throwing sticks, nets, and snares. Processing and storage equipment included a variety of flaked stone tools, milling implements, ceramic vessels, and baskets.

Nonutilitarian culture was not neglected. A range of community ceremonies were performed, with particular emphases placed on making individuals' coming of age and on death and mourning. Oral

literature included, in particular, an elaborate creation myth that was shared with the Takic-speaking Serrano as well as with Yuman speakers (Kroeber 1925; Laylander 2001; Waterman 1909).

History

European exploration of the San Diego area began in 1542 with the arrival of a maritime expedition under Juan Rodriguez Cabrillo, followed by a similar reconnaissance in 1602 by Sebastián Vizcaíno (Pourade 1960). It is possible that additional brief, unrecorded contacts with the crews of the Manila galleons may have occurred during the following century and a half, and that other influences, such as an awareness of alien technologies or the introduction of diseases, may have reached the region overland from earlier outposts of the Spanish empire in Baja California or Sonora.

The historic period proper did not begin until 1769, when multiple seaborne and overland expeditions under the leadership of the soldier Gaspar de Portolá and the Franciscan missionary Junípero Serra reached the region from Baja California and passed northward along the coastal plain to seek Monterey. To the south, a royal presidio and a mission were established that year in San Diego. Additional missions were founded among the Luiseño/Juaneño at San Juan Capistrano in 1776 and San Luis Rey de Francia in 1798. An *asistencia* or satellite mission for San Luis Rey was established at Pala in 1816.

As Spanish attention was consumed by the Napoleonic wars in Europe, California and its government and missions were increasingly left to their own devices. In 1821, Mexico consummated its independence from Spain, and the region became more open to outside visitors and influences (Pourade 1961). The loyalty to Mexico of the European Franciscans was considered to be in doubt, and private secular interests clamored for a greater share of the region's resources. The missions were secularized by act of the Mexican Congress in 1833. Native Americans released from the missions at San Diego, San Luis Rey, and San Juan Capistrano returned to their native villages, moved east to areas lying beyond Mexican control, or sought work on ranchos or in the towns of San Diego and Los Angeles. Numerous large land grants were issued to private owners during the Mexican period, including El Rincon del Diablo, Monserrate, Guejito y Cañada de Palomia, Cuca, Pauma, Valle de San José, and San José del Valle in inland northern San Diego County (Pourade 1963).

The conquest and annexation of California by the United States in the Mexican-American War between 1846 and 1848 ushered in many more changes (Pourade 1963, 1964, 1965, 1967, 1977; Pryde 2004). Faced with debts and difficulties in confirming land grants, many Californio families lost their lands to outsiders. Cultural patterns that were brought by immigrants from the eastern U.S. gradually supplanted old Californio customs. Native American reservations were established at Pala, Mission Reserve, Pauma-Yuima, Los Coyotes, La Jolla Rincon, and San Pasqual (Shipek 1978).

The region experienced cycles of economic and demographic booms and busts, with notable periods of growth in the mid-1880s, during World Wars I and II, and on more sustained basis throughout the postwar decades. Aspects of development included the creation of transportation networks based on port facilities, railroads, highways, and airports; more elaborate systems of water supply and flood control; grazing livestock and growing a changing array of crops; supporting military facilities, including the extensive Camp Pendleton facility established in 1942; limited amounts of manufacturing; and accommodating visitors and retirees. After false starts, San Diego converted itself to a substantial city, and then into a metropolis. Escondido was incorporated as a city in 1888), and unincorporated north county communities include Fallbrook, Bonsall, Valley Center, Pala, and Pauma Valley (Pryde 2004).

Escondido: Settlement and Growth

Confirmation of rancho boundaries in the late 1860s and early 1870s across the county drew additional settlers as land became officially conveyable. Thereafter, small farming communities were established.

Around 1886, El Rincon del Diablo Rancho, now generally occupied by the city of Escondido, was opened to settlement. By that time, horticulture had already begun around the county, with many of the earliest plantings in fruit trees and grapes. Escondido developed during that boom time as a new citrus-growing community that also developed grapes, hay, and grain, and is credited with planting the first avocado tree in the county (Heilbron 1936:207). By 1890, the city population had grown to 541 (U.S. Census Bureau 1900:439).

While ranching and farming had been important livelihoods in San Diego County, agriculture increasingly became an important economy. Water projects developed across the county in the late nineteenth and early twentieth centuries that made this possible. In Escondido, completion of the Escondido Reservoir (now Lake Wohlford) by the Escondido Mutual Water Company supplied water to the valley and opened up more opportunities for citrus (oranges and lemons) plantings (Fox 2016; Heilbron 1936). Individual growers processed their own fruit by washing and drying them before taking them to the Escondido depot to ship to consumers in the east. In the early 1900s, growing cooperatives developed in Escondido that were known as the Escondido Citrus Union and the Escondido Fruit Growers Association. By 1916, the number of acres planted with citrus had risen to 600. Just 12 years later, nearly 2,800 acres were devoted to growing citrus. The industry had grown so large that the two cooperatives dissolved and new organizations were formed: the Escondido Lemon Association and the Escondido Orange Association. They were local divisions of the San Diego County Exchange and the California Exchange. Lemon production grew from 64,470 boxes in 1911 to over one million boxes in 1941. Orange production had grown from 12,225 boxes in 1918 to 1.4 million boxes in 1943. In the 1920s and 1930s, the citrus industry was the local economic engine, and many people were employed by it or benefitted from it as merchants (Fox 2016; San Diego Directory Company 1938). Escondido transitioned from a rural town of 755 in 1900 to a growing agriculture-based city of 3,421 in 1930, a significant increase of 353 percent (U.S. Census Bureau 1900:439, 1930: 137).

The avocado industry developed behind the citrus industry, with the first cooperative established as the California Avocado Association (later Society) in 1915 (Shepherd and Bender 2001). In San Diego County, the oldest seedling was planted in 1892, just 2 mi. north of Escondido. However, the earliest orchards were planted in Vista in 1915 and 1916 (Popenoe 1927). In the 1920, "Haas" avocadoes were developed as an alternative to the "Fuerte" avocado that had short seasons and erratic production. The California Avocado Exchange (later Calavo Growers of California) was established in 1924 in an effort to standardize the industry and market the products. In 1926, the first carload of avocados was shipped to Chicago (Shepherd and Bender 2001). In San Diego County, Vista had planted some of the earliest and largest plantings in the county, but the Escondido plantings were still young in 1927 (Popenoe 1927). The industry struggled during the 1930s due to root rot, fungus, long-standing low temperatures, and overproduction for a smaller market. Demand for avocadoes increased in the 1940s and thereafter due to larger marketing efforts. Growing avocadoes increasingly became a lucrative business (Shepherd and Bender 2001).

In 1935, the primary county exports were citrus, poultry, and dairy, with Escondido supplying almost half of the county's exports. By 1936, Escondido led the county in citrus production and was the foremost producer of avocados and citrus for the state. An assured water supply for irrigation and domestic use was pivotal to the area's success (Heilbron 1936). In the post-World War II housing shortage, citrus acreage was increasing replaced with housing. Other industries offered new employment opportunities in Escondido and around San Diego County. By 1958, avocadoes still held strong. San Diego comprised more than half of the avocado acreage in California. Avocado acreage had grown from approximately 7,900 acres in 1936 to 15,000 in 1958. Avocados were second to tomatoes in plant crops and fourth in overall agricultural products, following eggs, tomatoes, and milk (Gustafson 1959). By 1960, over one million people lived in the county, and between 1950 and 1970, bedroom communities such as El Cajon, Escondido, Chula Vista, and Oceanside experienced a tremendous growth rate (between 214 and 833 percent) (Engstrand 2005:166; U.S. Census Bureau 1960). By then, market condition prompted the dissolution of the two citrus organizations (Fox 2016). Yet, avocado production remains an important crop for San Diego County.

Land-Use History of APE

The Escondido Land and Town Company acquired a portion of the Rancho Del Diablo that is the presentday property. In November 1890, the Escondido Land and Town Company granted a portion of that property to John D. Cornell. In February 1891, Cornell deeded that portion to the Escondido Gold Mining Company. The mining company in turn deeded that property to John Becker in December 1898. In March 1904, Escondido Land and Town Company granted another portion of the property to the Cleveland Pacific Mining Company (Kiely 2016).

The Cleveland-Pacific Mining Company's Escondido Mine was located immediately west and north of the present project's Area of Potential Effects (APE). It is now underneath a subdivision off Bear Valley Parkway between Encino Drive and El Dorado Drive. According to California Bureau of Mines, the Escondido mine area had been worked by early Spaniards and Mexicans, and sometime around 1868 Americans began working it with arrastres. In 1884, the Escondido Town and Land Company purchased the land grant property, and after a number of land ownership changes, the Cleveland Pacific Mining Company acquired it in 1897 and William F. Spieth was named superintendent. Spieth was the company's attorney and operated out of Cleveland, Ohio. By 1908, the Cleveland-Pacific Mining Company had discovered two deposits from which rich ore was packaged for shipment. The small stamp mill was erected in June 1908. It operated until 1911, when the company encountered an abundance of pyrite ("fool's gold") and a rising water table that limited the depth of the shaft. At that time, the company used two steam hoists and a five-stamp mill with plates, a Wilfley table, and two 10-ft.-tall cyanide tanks (Engineering and Mining Journal 1908a:977, 1908b:1166, 1908c:1311; Hamilton 1915:650-651; Kiely 2016). In 1924, the Escondido mine was sold to B. F. Brough and Associates of Toledo, Ohio, who opened new workings 1,000 ft. to the west with a new shaft. Old mining dumps in the area were reworked (Lorey 2010). In 1926, operations ceased permanently (Lorey 2010). While San Diego County was never one of the most productive counties, Escondido ranked third in the county's production (Lorey 2010). The Escondido Mine and the Oro Mine were the two highest-producing mines in Escondido. The Escondido Mine produced 4,000 oz. of gold and 3,500 oz. of silver, or approximately more than \$2,000,000. Shafts were dynamited in the 1930s for safety (Warth 2006).

According to Burnet F. Wohlford (son of Burnet C. and Mildred Wohlford), the early uses of the APE included some prospecting and exploratory mining south and west of the remaining residence (Wohlford 2016). From February 1920 until 1922, it appears that the ownership of the entire parcel may have been in question. In July 1922, John Becker granted the deed to William F. Spieth. In August 1923, William F. Spieth deeded the property to Lawrence C. Spieth. However, he was also an absentee owner and lived in Ohio (Kiely 2016; United States Census Bureau 1940). A 1928 aerial photo shows that much of the property was unused at this time (Tax Factor 1928). In 1938, orange and avocado groves were planted in the APE and both permanent and temporary irrigation was installed. A shed had been constructed years earlier (1925). Oranges were produced for the Escondido Orange Association, and avocados were produced for Calavo. It was a private operation and was not one of most productive groves in the area (San Diego County Assessor 1979; Wohlford 2016). Some lemons and grapefruit was also grown on the property (San Diego County Assessor 1979).

In February 1940, Spieth deeded half of the property to Burnet C. Wohlford (Kiely 2016). The extant house and 8-by-12-ft. detached garage was constructed in 1946. The wood-frame house was constructed with stucco and board-and-batten, with double-hung windows, a hip roof and gable porch, and composite shingles. A 12-by-55-ft. shed (now demolished) was also constructed. Several pumps were installed on the property (San Diego County Assessor 1979). Burnet C. Wohlford was the son of Alvin Wohlford, who ran the Escondido Mutual Water Company and owned Escondido National Bank. Sometime after Alvin Wohlford died in 1924, Burnet sold his father's bank and put in 125 acres of oranges, lemons, grapefruit, and avocados in Escondido (McGrew 1988:207-208). Thereafter, he was well known for his leadership at

the water company and for cultivating citrus and avocados. Although Burnet C. Wohlford owned half of the property, he did not live there. Burnet and Mildred lived off Fourth Street in 1937 and moved into his parents' adobe ranch house sometime after his mother died in 1944. The two lived there until Burnet died in 1979 (Fox 2016; McGrew 1988:208; San Diego Directory Company 1937). The grove manager, Braxton Davis, occupied the house (Wohlford 2016).

In 1953, the entire property (APNs 237-131-01 and 237-131-02) was cultivated with citrus and avocado groves that amounted to approximately 42 acres (San Diego County Assessor 1979; United States Department of Agriculture 1953). The property was continuously used for production until at least 1979 (San Diego County Assessor 1979). Sometime between 1989 and 1995, the trees were removed from the property (United States Department of Agriculture 1947, 1953, 1964, 1967, 1968, 1980, 1989, 1995). The last title transfer occurred in December 1967, when Spieth and Wolford acquired half of the property from the estate of Lawrence C. Spieth and the other half from Burnet C. and Mildred D. Wohlford (Kiely 2016).

RECORDS SEARCH RESULTS

A records search for the project area was requested from the South Coastal Information Center (SCIC) of the California Historical Resources Information System (CHRIS) at San Diego State University, on March 21, 2016. The records search area included the entire project area as well as a 1-mi. search radius around the project area. The records search included a search of all relevant site records and prior reports on file with the SCIC, as well as a search of the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), and other local registers, to determine if significant archaeological or historical sites have previously been recorded within or near the project area. The full results of the records search are provided in Confidential Appendix A of the survey report *Phase I/Class III Inventory and Built Environment Evaluation for the 661 Bear Valley Parkway Residential Development Project in Escondido, California* (Daniels and Stringer-Bowsher 2016).

Previous Studies

The records search identified a total of 53 previous cultural resource studies that address areas within the 1-mi. radius of the project area. Four of those reports address areas within the current project area (Table 1).

NADB No.	SHPO ID	Title	Author(s)	Year
1121659	WADE 87-19	Results of an Archaeological Archival and Field Survey of the Bear Valley Parkway/SR-78 General Plan Amendment EIR Project Area San Diego County, California	Wade, Sue A.	1987
1122777	AFFINIS 93-03	Cultural Resources Survey for the Bear Valley Parkway (South) Reconstruction. Activity No. Uj1194, Escondido, San Diego County, California	Affinis and M. Robbins-Wade, R. Alter	1993
1128588	CITYESC 80-03	Draft Environmental Impact Report for Expansion of Wastewater Treatment Facility	City of Escondido	1980
1132109	DALOPM01	The Westfield North County Expansion Offsite Improvements Project, City of Escondido, San Diego County, California	Dalope, Michelle and Susan Hector	2008

Table 1. Cultural Resource Reports Addressing Areas intersecting the Project Area

Previously Recorded Sites

The records search identified 27 previously recorded sites and isolates within the 1-mi. search radius (Table 2). Just one of those previously recorded sites, SDI-12920, intersects the project area. This site was recorded as a historic-period can scatter with one glass bottle on the east side of Bear Valley Parkway just above the creek that runs along the western boundary of the project area.

Designation			
Primary Number (P-37-)	Trinomial (CA-SDI-)	Site Type	Recorder, Date
000563	563	AP2. Lithic scatter	True 1948
000571	571	AP15. Habitation debris	True 1948
004659	4659	AP4. Bedrock milling	Hatley and Price 1976
005340	5340	AP2. Lithic scatter, AP3. Ceramic scatter, AP4. Bedrock milling, AP15. Habitation debris	Chace 1977; James, Collins, and d 1991; Zepeda-Herman 2010
005426	5426	Isolate core tool	Norwood 1977
007245	7245	AP4. Bedrock milling	Laylander 1979; Van Horn 1990
009939	9939	AP4. Bedrock milling	Chace 1984
010308	10308	AP4. Bedrock milling	Collins 1985
010309	10309	AP3. Ceramic scatter, AP4. Bedrock milling	Collins 1985
010310	10310	AP4. Bedrock milling	Collins and Chace 1985
010311	10311	AP4. Bedrock milling and one proximal biface end	Collins and Chace 1985
012530	12530	AH15. Standing structures	James, Briggs, and Campbell 1991
012531	12531	AH4. Trash scatter, AH15. Standing structures	James, Briggs, and Campbell 1991
012537	12537	AP2. Lithic scatter, AP15. Habitation debris, AH2. Foundation/structure pad	James, Briggs, and Campbell 1991
012538	12538	AP2. Lithic scatter, AP4. Bedrock milling	James, Briggs, and Mealey 1991
012539	12539	AH4. Trash scatter	James, Briggs, and Campbell 1991
012540	12540	AP4. Bedrock milling	James, Briggs, and Mealey 1991
012541	12541	AP3. Ceramic scatter, AP15. Habitation debris	James, Collins, and Koolman 1991
012919	12919	AP2. Trash scatter	Robbins-Wade, Pearl, Hyland, and Alter 1992
012920	12920	AP2. Trash scatter	Robbins-Wade, Pearl, Hyland, and Alter 1992
024169		AH16. Water Collection Point	McLean and Michalsky 2001
025682	17081	AH9. Mine and tailings	Lorey 2004
025929		Isolated hammer stone	Robbins-Wade and Sivba 2004
026765		HP3. Single family property, HP5. Hotel/motel	Davidson 2005
026766		HP5. Hotel/motel	Davidson 2005

Table 2. Previously Recorded Cultural Resources within a 1-mi. Radius of the Project Area

2. Setting and Background

Designation			
Primary Number (P-37-)	Trinomial (CA-SDI-)	Site Type	Recorder, Date
026767		HP3. Single family property, HP5. Hotel/motel	Davidson 2005
026768		HP5. Hotel/motel	Davidson 2005
033534	21079	AP4. Bedrock milling	Wilson and Bietz 2013

NATIVE AMERICAN CORRESPONDENCE

ASM submitted a request to the NAHC for a search of the Sacred Lands File and a list of tribal contacts that may have concerns or additional knowledge of tribal cultural resources in the area. ASM received a response from the NAHC on March 22, 2016 that indicated negative results in the search of the Sacred Lands File for the project area. The NAHC provided a list of 17 Native American contacts that may have knowledge of traditional cultural properties or areas of heritage or religious significance (Table 3). ASM sent letters to the tribal contacts on March 24, 2016 to inform them of the proposed project and request additional information regarding known traditional cultural properties within the vicinity of the proposed project area. To date, ASM has received responses from three of the tribal contacts. Mr. Chris Devers, Vice Chairman of the Pauma Band of Luiseno Indians, requested a copy of the cultural study once it is completed and that if any sites are identified on the property that they be preserved. The Viejas Band of Kumeyaay Indians requested a copy of this report so that they may make an informed decision and recommendation on the project. Joseph Ontiveros, the Cultural Resource Director for the Soboba Band of Luiseño Indians, indicated that the Soboba Band does not currently have any specific concerns regarding known cultural resources within the project area, but does request that the appropriate consultation continue to take place between concerned tribes, project proponents, and local agencies. A record of Native American correspondence is contained in Appendix B of the survey report (Daniels and Stringer-Bowsher 2016).

Contact	Affiliation
Clifford LaChappa, Chairperson	Barona Group of the Capitan Grande
Allen E. Lawson, Chairperson	San Pasqual Band of Mission Indians
Cody J. Maritinez, Chairperson	Sycuan Band of the Kumeyaay Nation
Robert J. Welch, Sr. Chairperson	Viejas Band of Kumeyaay Indians
Erica Pinto, Chairperson	Jamul Indian Village
Virgil Oyos, Chairperson	Mesa Grande Band of Mission Indians
Shasta Gaughen, PhD, THPO	Pala Band of Mission Indians
Randall Majel, Chairperson	Pauma Band of Luiseno Indians
Rosemary Morillo, Chairperson	Soboba Band of Luiseno Indians
Carmen Lucas	Kwaaymii Laguna Band of Mission Indians
Rebecca Osuna, Chairman	Inaja Band of Mission Indians
Bo Mazzetti, Chairperson	Rincon Band of Mission Indians
Carmen Mojado	San Luis Rey Band of Mission Indians
Mark Macarro, Chairperson	Pechanga Band of Mission Indians
Thomas Rodriguez, Chairperson	La Jolla Band of Luiseno Indians
Virgil Perez, Chairperson	lipay Nation of Santa Ysabel

Table 3.	Native American	Contacts
1 4010 0.		001110010

3. RESEARCH DESIGN AND METHODS

This section discusses the basic research design for the archaeological evaluation research methods that have been utilized for the current investigation for the proposed residential development at 661 Bear Valley Parkway.

RESEARCH DESIGN FOR EVALUATION

For an archaeological evaluation such as this one, the primary objectives with respect to prehistoric and historic archaeological resources are straightforward: to identify and document all of the resources that are present through subsurface testing. For the research design, the field requirements are (1) that subsurface sampling include a sufficient portion of the area adjacent to the bedrock milling to confirm a lack of nearby subsurface archaeological deposits, and (2) that the spatial extent and general character of any identified resources be documented according to the prevailing professional standards.

EVALUATION FIELD METHODS

Evaluation methods are essentially sampling methods geared toward recovering a reasonably sized assemblage to estimate the density and diversity of the cultural deposit and to expose enough of the deposit to determine integrity. The methods employed during the current investigation of SDI-21808 are described below, including surface inspection and collection and subsurface investigation.

The first step in the evaluation was to re-locate archaeological features and landforms noted on previous site visits to SDI-21808. The next step was to conduct regular-interval transects of the site surface and pin-flag artifacts to establish a real-time visual perspective of site properties.

No surface artifacts were identified, so an excavation strategy was then determined to ensure that the previously defined boundaries of the site were correct as well as to determine if subsurface archaeological deposits were present at the site.

Three STPs (standard test pits) were excavated to determine if cultural deposits are present at SDI-21808 and if so, to determine the character and distribution of those deposits. STPs are small, 25-x-40-cm, exploratory units excavated in 20-cm vertical increments to depths of no more than 100 cm and are typically spaced at 10-m intervals or subjectively placed. STPs are typically used to explore the edges of cultural deposits, providing a positive-negative indication for the presence of subsurface cultural material, as well as to test whether any subsurface cultural material is present at the site as a whole.

All excavated matrix was screened through 1/8-in. (3-mm) mesh. The three STPs excavated during this evaluation were excavated to depths between 60 and 80 cm below surface. Small soil samples were taken for color and constituent classification.

The locations of STPs were recorded using a Trimble Pathfinder GPS receiver with real-time correction capabilities and accuracy down to 10 cm. A series of overhead photographs were taken to show the completed STPs. All field notes and documentation are housed at the ASM office in Carlsbad, California.

Completed DPR site update forms are included in this technical report as Confidential Appendix A. Digital photographs document the environmental associations and the specific features of the site, as well as the general character of the survey area.

4. EVALUATION RESULTS

SDI-21808 EVALUATION RESULTS

The evaluation fieldwork at SDI-21808 was conducted on June 1, 2015. Doug Drake and Charles Dickerson conducted the evaluation. Shelly Nelson of Saving Sacred Sites served as the Native American monitor. Prior to excavation, the entire site area was resurveyed in an effort to identify and record any surface artifacts in the site. During the initial survey phase in March, no surface artifacts were identified at SDI-21808. During the evaluation phase, no surface artifacts were identified or recorded on the ground surface within SDI-21808.

The three STPs excavated to test the significance of SDI-21808 were subjectively positioned within and across the site. Figure 4 shows the location of the three excavated STPs. No units yielded any cultural materials. Charred plant remains and modern refuse associated with farming were present in the top 20 cm across the site, including ferrous metal wire and fragmented oyster shell, likely present from past fertilizing activities in the site vicinity. Table 4 provides a summary of the depths of excavation and the soils documented during excavation of each of the STPs. A site record update submitted to the SCIC is included in Confidential Appendix A of this report.

The STPs were excavated in the vicinity of the two bedrock milling features that ASM archaeologists identified and recorded as SDI-21808 during the previous survey of the project area. The two outcrops are separated by approximately 13 m, with two larger granitic boulders between them and a large, isolated palm tree just to the west (Figure 5). Feature 1 is approximately 2.3 x 1.2 m in size, with a maximum height of about 50 cm and with a slick that measures approximately 20×10 cm (Figures 6 and 8). Feature 2 is located north of Feature 1 and measures approximately 1.8×1.1 m in size, with a maximum height of about 60 cm. Feature 2 contains a slick that is approximately 20×20 cm in size (Figures 7 and 9). The boundary of the site was drawn to encompass the two features within an ellipsoid that is 222.7 m² in size and measures about 23 m long by 12.5 m wide (see Figure 4). Both of the milling slicks are rough and slightly exfoliated.

No artifacts were noted within the immediate vicinity of the milling features during the survey or site evaluation. Evidence of previous burning in the area was noted, including some charred vegetation and some ash on the ground surface, but this is attributable to recent burns possibly associated with the agricultural activity in the area. Several baked earth patches were noted across the project area, with a ring in the center of each patch about the size of a palm tree trunk. The palm trees were likely burned in place, causing the ground around their bases to harden.

STP	Max Depth	Artifacts	Soil Description
1	80	None	Lightly compact medium-brown sandy loam
2	60	None	Lightly compact medium-brown sandy loam
3	80	None	Moderately compact medium-brown sandy loam

Table 4. Results of STP Excavations at SDI-21808



Figure 4. Sketch map of SDI-21808 showing the site boundary and the location of the bedrock outcrops and milling features associated with the site.



Figure 5. Southeast-facing overview of SDI-21808.



Figure 6. Bedrock Milling Feature 1 associated with SDI-21808. The milling slick is located just left of the north arrow.



Figure 7. Bedrock Milling Feature 2 associated with SDI-21808. The milling slick is located to the right of the north arrow.







Figure 9. Bedrock Milling Feature 2 sketch map.

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5. CONCLUSIONS AND MANAGEMENT RECOMMENDATIONS

This study presents the results of a record and archival search, cultural resources survey, and archaeological evaluation at SDI-21808 conducted in support of the Bear Valley Parkway Residential Development, Escondido, California. The cultural resource investigation was conducted in compliance with the California Environmental Quality Act (CEQA) and Section 106 of the National Historic Preservation Act (NHPA). Section 106 is applicable to federal undertakings, including Projects financed or permitted by federal agencies, regardless of whether the activities occur on land that is managed by federal agencies, other governmental agencies, or private landowners. In practice, the NRHP criteria for eligibility applied under Section 106 are generally (although not precisely) concordant with CRHR criteria. Therefore, SDI-21808 was evaluated for NRHP eligibility, with equal applicability to CRHR. Compliance with CEQA requires consideration of impacts to cultural resources as historical resources or those resources potentially eligible for listing on the CRHR. The procedures for assessing archaeological and historical resources are addressed in CEQA Guidelines Section 15064.5(a) and 15064.5(c).

During the archaeological evaluation, the recorded cultural resource within SDI-21808 was relocated, and its condition was observed to be identical to what it was at the time of its last recording. No additional cultural materials were identified on either the surface or subsurface of the site.

NATIONAL REGISTER OF HISTORIC PLACES CRITERIA

Authorized by the NHPA of 1966, the National Park Service's NRHP is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect America's historic and archeological resources. The NRHP is the official list of the nation's historic places worthy of preservation. The NRHP criteria for evaluation are designed to guide federal agencies and others in evaluating whether a property is eligible for inclusion in the NRHP. *How to Apply the National Register Criteria for Evaluation, National Register Bulletin 15*, was followed for the evaluation of SDI-21808 (National Park Service, National Register of Historic Places 1991). The criteria for evaluation are as follows:

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity and:

- A. are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. are associated with the lives of persons significant in our past; or
- C. embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. have yielded or may be likely to yield, information important in prehistory or history [36 CFR 60.4].

Bulletin 15 also establishes how to evaluate the integrity of a property: "Integrity is the ability of a property to convey its significance." The evaluation of integrity must be grounded in an understanding of a property's physical features, and how they relate to the concept of integrity. Determining which of these aspects are most important to a property requires knowing why, where, and when a property is significant. To retain

historic integrity, a property must possess several, and usually most, aspects of integrity, which include location, design, setting, materials, workmanship, feeling, and association.

CALIFORNIA REGISTER OF HISTORICAL RESOURCES CRITERIA

The CRHR program encourages public recognition and protection of resources of architectural, historical, archeological, and cultural significance, identifies historical resources for state and local planning purposes, determines eligibility for state historic preservation grant funding and affords certain protections under CEQA. The criteria established for eligibility for the CRHR are directly comparable to the NRHP criteria.

In order to be eligible for listing in the CRHR, a building must satisfy at least one of the following four criteria under subdivision c:

- 1) It is associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States.
- 2) It is associated with the lives of persons important to local, California, or national history.
- 3) It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values.
- 4) It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

Cultural resources eligible for listing in the CRHR must meet one of the criteria of significance described above and retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. For the purposes of eligibility for CRHR, integrity is defined as "the authenticity of an historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance" (Office of Historic Preservation 2001).

CALIFORNIA ENVIRONMENTAL QUALITY ACT SIGNIFICANCE CRITERIA

CEQA requires that all private and public activities not specifically exempted be evaluated against the potential for environmental damage, including effects to historical resources. Historical resources are recognized as part of the environment under CEQA. It defines historical resources as "any object, building, structure, site, area, or place which is historically significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California," as cited in Division I, Public Resources Code, Section 5021.1[b].

Lead agencies have a responsibility to evaluate historical resources against the CRHR criteria prior to making a finding as to a proposed Project's impacts to historical resources. Mitigation of adverse impacts is required if the proposed Project will cause substantial adverse change to a historical resource. Substantial adverse change includes demolition, destruction, relocation, or alteration such that the significance of an historical resource would be impaired. While demolition and destruction are fairly obvious significant impacts, it is more difficult to assess when change, alteration, or relocation crosses the threshold of substantial adverse change. The CEQA Guidelines provide that a Project that demolishes or alters those physical characteristics of an historical resource that convey its historical significance (i.e., its character-defining features) can be considered to materially impair the resource's significance. The CRHR is used in the consideration of historical resources relative to significance for purposes of CEQA. The CRHR includes resources listed in, or formally determined eligible for listing in, the NRHP, as well as some California State Landmarks and Points of Historical Interest. Properties of local significance that have been designated under a local preservation ordinance (local landmarks or landmark districts), or that have been identified in

a local historical resources inventory, may be eligible for listing in the CRHR and are presumed to be significant resources for purposes of CEQA unless a preponderance of evidence indicates otherwise.

Generally, a resource shall be considered by the lead agency to be a "historical resource" if it:

- 1) Is listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code, § 5024.1, Title 14 CCR, Section 4850 et seq.).
- 2) Is included in a local register of historical resources, or is identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code.
- 3) Is a building or structure determined to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California.

MANAGEMENT RECOMMENDATIONS

Archaeological sites are typically evaluated for NRHP and CRHR eligibility under Criterion D or Criterion 4, respectively, but may also be eligible under Criterion A (or Criterion 1) if they are associated with important events such as a migration, cultural adaptations, or trade routes and trails. Due to its lack of association with important events such as a migration, cultural adaptations, or trade routes and trails, site SDI-21808 is not eligible for the NRHP or CRHR under Criterion A or Criterion 1. Due to the lack of a subsurface archaeological component, it is also unlikely to be useful in addressing substantive research questions, and therefore is not eligible under NRHP Criterion D or CRHR Criterion 4. As a result, the test excavations conducted at SDI-21808 indicate that the site does not possess subsurface cultural deposits considered significant under CEQA.

The type of milling features at the site are ubiquitous, nondistinctive, possess no evident research potential, and are not eligible for the NRHP or CRHR under any of the established criteria. Therefore, potential impacts to SDI-21808 associated with the proposed project would be less than significant. No further work is recommended for SDI-21808. ASM does recommend archaeological monitoring for the entire proposed project APE during ground disturbing activities associated with construction due to the potential for the presence of as yet unidentified subsurface cultural resources within the proposed project APE. Additional cultural resources work would be required if future modifications are made to the boundaries of the proposed project.

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APPENDICES

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CONFIDENTIAL APPENDIX A

DPR Site Record Update for CA-SDI-21808

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