

APPENDIX C
Cultural Resources Report

June 20, 2016

9375

Greg Waite
Gateway Grand Project Owner, LLC
2235 Encinitas Boulevard, Suite 216
Encinitas, California 92024

Subject: Cultural Resources Inventory for the Escondido Gateway Project, City of Escondido, California

Dear Mr. Waite:

This letter documents the Phase I cultural resources inventory conducted by Dudek for the Escondido Gateway Project, located in the City of Escondido, San Diego County, California. Integral Communities is proposing to construct a mixed-use commercial and residential development on a 2.6 acre parcel. The City of Escondido (City) is the lead agency for planning purposes under the California Environmental Quality Act (CEQA). A South Coastal Information Center (SCIC) records search indicates that no cultural resources have been recorded in the proposed project site. Dudek conducted an intensive pedestrian survey for cultural resources of the project site in accordance with the standards and guidelines defined by CEQA and the Office of Historic Preservation (OHP). No cultural resources were identified within the project site as a result of the survey. No further cultural resource considerations are recommended for this resource.

PROJECT DESCRIPTION AND LOCATION

The Gateway Grand Project Owner, LLC is proposing to construct mixed-use commercial and residential development located in the City of Escondido (Figure 1). The project site is located on a 2.6 acre parcel bound on the north by Valley Parkway, on the south by Grand Ave, on the west by the North County Transit district right-of-way, and on the east by a parking lot. The project site falls within Section 21, Township 12 South, Range 2 West of the *Escondido, CA* U.S. Geological Service (USGS) 7.5-minute series topographic Quadrangle map (Figure 2). The project site would include 1,000 square feet of commercial space and 126 multi-family residential units (Figure 3). The project site is currently occupied by an office building and associated parking lots.

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REGULATORY FRAMEWORK

California Register of Historical Resources (CRHR)

In California, the term "historical resource" includes but is not limited to "any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California" (PRC section 5020.1[j]). In 1992, the California legislature established the CRHR "to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC section 5024.1[a]). The criteria for listing resources on the CRHR were expressly developed to be in accordance with previously established criteria developed for listing in the National Register of Historic Places (NRHP), enumerated below. According to PRC Section 5024.1(c)(1-4), a resource is considered historically significant if it (i) retains "substantial integrity," and (ii) meets at least one of the following criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. Is associated with the lives of persons important in our past.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
4. Has yielded, or may be likely to yield, information important in prehistory or history.

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the NRHP and properties listed or formally designated as eligible for listing in the NRHP are automatically listed in the CRHR, as are the state landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

California Environmental Quality Act

As described further below, the following CEQA statutes and CEQA Guidelines are of relevance to the analysis of archaeological, historic, and tribal cultural resources:

- PRC section 21083.2(g) defines "unique archaeological resource."

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- PRC section 21084.1 and CEQA Guidelines section 15064.5(a) defines “historical resources.” In addition, CEQA Guidelines section 15064.5(b) defines the phrase “substantial adverse change in the significance of an historical resource;” it also defines the circumstances when a project would materially impair the significance of an historical resource.
- PRC section 21074(a) defines “tribal cultural resources.”
- PRC section 5097.98 and CEQA Guidelines section 15064.5(e): Set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated ceremony.
- PRC sections 21083.2(b)-(c) and CEQA Guidelines section 15126.4: Provide information regarding the mitigation framework for archaeological and historic resources, including examples of preservation-in-place mitigation measures; preservation-in-place is the preferred manner of mitigating impacts to significant archaeological sites because it maintains the relationship between artifacts and the archaeological context, and may also help avoid conflict with religious or cultural values of groups associated with the archaeological site(s).

More specifically, under CEQA, a project may have a significant effect on the environment if it may cause "a substantial adverse change in the significance of an historical resource." (PRC section 21084.1; CEQA Guidelines section 15064.5[b]). If a site is either listed or eligible for listing in the CRHR, or if it is included in a local register of historic resources, or identified as significant in a historical resources survey (meeting the requirements of PRC section 5024.1[q]), it is a "historical resource" and is presumed to be historically or culturally significant for purposes of CEQA. (PRC section 21084.1; CEQA Guidelines section 15064.5[a]). The lead agency is not precluded from determining that a resource is a historical resource even if it does not fall within this presumption. (PRC section 21084.1; CEQA Guidelines section 15064.5[a]).

A "substantial adverse change in the significance of an historical resource" reflecting a significant effect under CEQA means "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired" (CEQA Guidelines section 15064.5[b][1]; PRC section 5020.1[q]). In turn, the significance of an historical resource is materially impaired when a project:

1. Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or

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2. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the PRC or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
3. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a lead agency for purposes of CEQA (CEQA Guidelines section 15064.5[b][2]).

Pursuant to these sections, the CEQA inquiry begins with evaluating whether a project site contains any "historical resources," then evaluates whether that project will cause a substantial adverse change in the significance of a historical resource such that the resource's historical significance is materially impaired.

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

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

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

Impacts to non-unique archaeological resources are generally not considered a significant environmental impact (PRC section 21083.2[a]; CEQA Guidelines section 15064.5[c][4]). However, if a non-unique archaeological resource qualifies as tribal cultural resource (PRC 21074[c]; 21083.2[h]), further consideration of significant impacts is required.

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CEQA Guidelines section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered.

SCIC RECORDS SEARCH

Staff at the SCIC conducted a California Historical Resources Information System (CHRIS) records search on December 16, 2015 for the proposed project site and surrounding one mile radius (Confidential Appendix A). This search included their collection of mapped prehistoric, historical, and built-environment resources, Department of Parks and Recreation (DPR) Site Records, technical reports, archival resources, and ethnographic references. Additional consulted sources included the NRHP, California Inventory of Historical Resources/CRHR and listed OHP Archaeological Determinations of Eligibility, California Points of Historical Interest, California Historical Landmarks, and Caltrans Bridge Survey information.

SCIC records indicate that 48 previous cultural resource investigations have been performed within one mile of the project area, of which two addressed the project site (Table 1). One study addressed both archaeological and historic built environment resources, and the other was a City-wide Environmental Impact Report (EIR); based on the size and types of studies, neither project may have specifically involved a survey of the project site.

Three archaeological resources were identified within a one mile radius of the project site, although none are within the project site. These archaeological resources include a one multi-component site (prehistoric habitation and historic refuse), one isolate consisting of a handstone fragment and a flake, and one site record which contains no information other than its location (Table 2). Well over 100 historic addresses have been recorded within one mile of the project site; however, the currently existing building has not been recorded as historic.

Table 1
Previous Studies Conducted Within the Project Site

Author	Year	Report	Title
Keller Environmental Associates, Inc.	1992	SD-08596	Appendices – Reclaimed Water Distribution System Project: Draft Environmental Impact Report
Donald A. Cotton and Associates	1983	SD-14394	Survey Report on Historic Cultural Resources, City of Escondido

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Table 2
Cultural Resources Located in the Project Site

Site Number	Period	Type	Description
CA-SDI-156	Unknown	Unknown	Site record contains no information other than legal description location, and UTM. Site was recorded by Treganza at an unknown date
CA-SDI-5210	Prehistoric / Historic	Habitation / Historic Refuse Scatter	Prehistoric: 27 bedrock milling stations, lithic debitage, retouched flakes, bifaces, groundstone, bone. Historic: glass and ceramic scatter dating to the late 1800s
P-37-015577	Prehistoric	Isolate	One metavolcanic secondary flake and one granitic handstone

A review of historic maps and aerials going back to 1947 indicates that the project site has been occupied by two separate developments in that time (Historic Aerials 2015). Two structures were located at the site from as early as 1947 to 1967, including a garage/shed and a larger indeterminate structure (possibly a house or farm building). By the subsequent 1980 aerial, both structures are gone, and the existing structure and parking lot have been constructed. Other historic maps dating to the late 1800s show multiple historic dirt roads crossing the area, as this area is located within the Rincon del Diablo land grant. Given the scale of the maps, it is difficult to determine if any of the roads/routes would have passed through the project site specifically, and given the extensive development of Escondido in recent decades, it is highly unlikely any evidence of those routes remains.

NATIVE AMERICAN COORDINATION

The City is responsible for government-to-government consultation with Native American Tribes under California Assembly Bill AB 52. To that end, Dudek has not performed any outreach to Native American groups or individuals to date. Should the City request assistance in the consultation process, Dudek will contact the Native American Heritage Commission to identify interested parties and will assist the City in preparing consultation request letters to each contact.

CULTURAL RESOURCES SURVEY

Methods

Dudek archaeologist Patrick Hadel conducted an intensive pedestrian survey on December 9, 2015 using standard archaeological procedures and techniques. All field practices met the Secretary of Interior's standards and guidelines for a cultural resources inventory. The survey methods consisted of a pedestrian survey conducted in parallel transects spaced no more than 10

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meters apart over the entire project site. Within each transect, the ground surface was examined for prehistoric artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools, ceramics, fire-affected rock), soil discoloration that might indicate the presence of a cultural midden, soil depressions, features indicative of the current or former presence of structures or buildings (e.g., standing exterior walls, post holes, foundations), and historic artifacts (e.g., metal, glass, ceramics, building materials). Ground disturbances such as burrows and cut banks were also visually inspected for exposed subsurface materials. No newly identified artifacts or archaeological features were identified within the project site.

All fieldwork was documented using field notes, digital photography, a Global Positioning System (GPS) receiver with sub-meter accuracy, iPad technology with close-scale field maps, and aerial photographs. All field notes, photographs, and records related to the current study are on file at Dudek's Encinitas, California office.

Results

No new cultural resources were identified during the pedestrian survey. The entire project site has been disturbed through previous development. A large office building currently occupies the majority of the site, with asphalt parking lots/driveway and landscaping occupying the remainder. No undisturbed, native sediments were observed. Inspection of rodent burrows and spoils in the vegetation planters identified only fill sediments comprised primarily of decomposed granite. The office building was constructed sometime after 1967 and before 1980, and therefore does not qualify as an historical resource.

As there are no cultural resources within the project site, there are no historical resources, as defined under CEQA. As a result, the proposed project would have a less than significant impact on historical resources under CEQA. Based on the level of prior disturbance and absence of cultural resources and intact native sediments, there is a very low potential for inadvertent discoveries during project implementation. Therefore, no further cultural resource considerations are recommended.

SUMMARY OF FINDINGS

Dudek's Phase I cultural resources inventory of the project site suggests that there is very low potential for the inadvertent discovery of cultural resources during ground breaking activities. SCIC records indicate that no cultural resources been recorded within the project site, and no resources were discovered during the pedestrian survey. As the building that currently exists at the

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project site is less than 50 years old, it does not qualify as an historic resource. Given the level of disturbance at the site, it is very unlikely that intact archaeological resources are still present.

MANAGEMENT RECOMMENDATIONS

Due to a lack of evidence for cultural resources within the project site, no further management recommendations are necessary beyond standard measures to address unanticipated discoveries of cultural resources and human remains (see below). The recommendation of no further archaeological work for the proposed project is presumed pending the results of consultation between the City and Native American groups under AB 52. If tribal contacts identify cultural resources within the project site, the City will work in cooperation with Native American tribal representatives to determine if monitoring or other treatment measures are necessary. As the lead agency under CEQA, the City is responsible for formal government-to-government consultation with the Tribes under AB 52. If requested, Dudek will assist the City in that process.

Unanticipated Discovery of Cultural Resources

In the unlikely event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the proposed project, all construction work occurring within 50 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether or not additional study is warranted. Depending upon the significance of the find, the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted.

Unanticipated Discovery of Human Remains

In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the County Coroner shall be notified within 24 hours of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within two working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the remains are determined to be Native American, the Coroner shall notify the NAHC within 24 hours. In accordance with California Public Resources Code, Section 5097.98, the NAHC must immediately notify the person it believes to be the most likely descendent (MLD) from the deceased Native American. The MLD shall complete their inspection within 48 hours of being

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granted access to the site. The designated Native American representative would then recommend, in consultation with the property owner, the final disposition of the human remains.

Should you have any questions relating to this report and its findings please contact me.

Respectfully Submitted,



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Archaeologist

DUDEK

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*Att: Figure 1. Regional Map
Figure 2. Vicinity Map
Figure 3. Site Plan
Appendix A: Confidential SCIC Records Search Information*

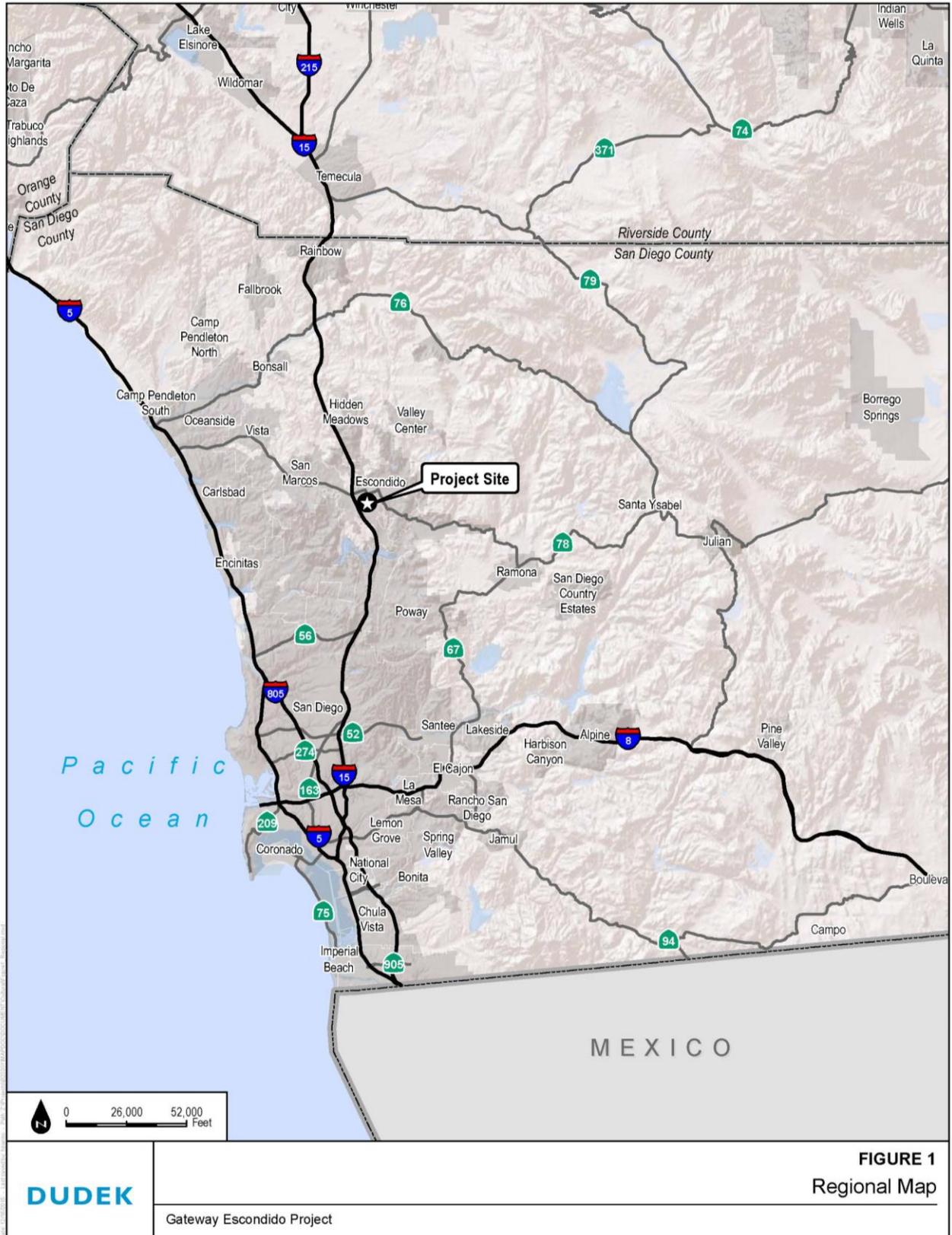
cc: Micah Hale, Dudek

REFERENCES CITED

HistoricAerials.com. 2015. Accessed October 2015. <http://www.historicaerials.com/aerials>.

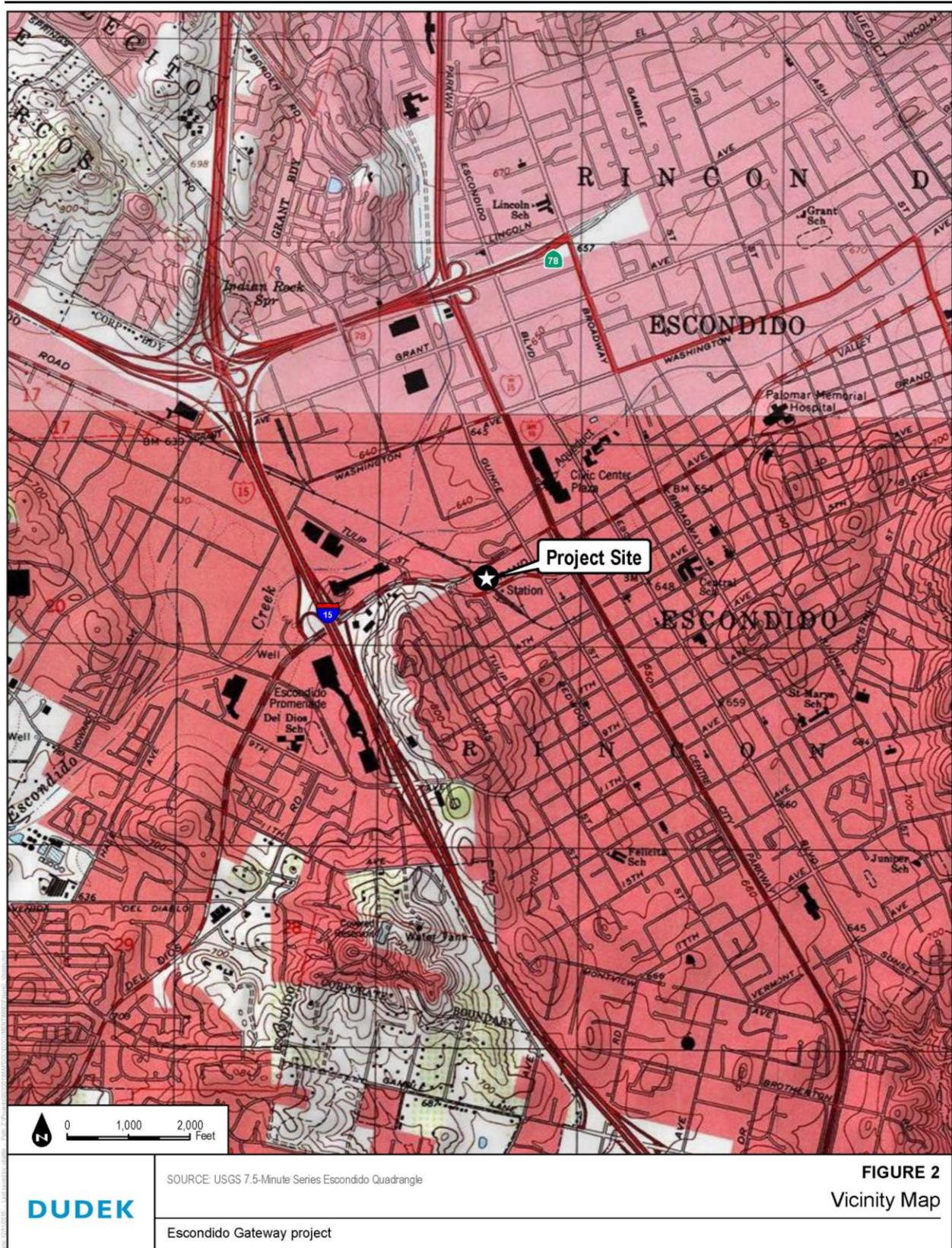
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APPENDIX A (CONFIDENTIAL)

SCIC Records Search Results

