City of Escondido

# CHAMBERS GROUP

October 26, 2022 9620 Chesapeake Drive, Suite 202 San Diego, CA 92123 (21359)

Emiliano Pelegri Senior Director Onward Energy

#### Subject: Goal Line Reliability Project Cultural Resources Records Search and Literature Review Letter Report

Dear Mr. Pelegri,

Chambers Group is providing this Letter Report for the cultural resources records search and literature review to City of Escondido in support of the Goal Line Reliability Project (Project, Proposed Project) in the City of Escondido, San Diego County, California. This assessment included a cultural resources records search and literature review for the Project site and study area (Figure 1). The purpose of the review is to gather and analyze information needed to assess the potential for impacts to cultural resources within the Proposed Project area.

#### **Project Description**

The Project Applicant proposes to construct, own, and operate the Goal Line Reliability Project, a lithium-ion battery energy storage facility capable of delivering up to 150 MW of energy storage capacity with a 4-to-8-hour capacity rating on approximately 4.5 acres within the approximately 6.5-acre site containing an existing electrical generation facility and a non-operational ice-rink facility (Project Site). Achievement of 150 MW of storage would be completed in three phases with a demolition phase removing the existing ice-rink facility, Phase 1 storing 50 MW for 8 hours (400 MWh), and Phase 2 storing approximately 100 MW for 4 hours (400 MWh) or another 50 MW for 8 hours (400 MWh). Energy stored in the Project will then be discharged into the grid when the energy is needed, providing important electrical reliability services to the local area. It is expected that between two to four staff members will visit the site weekly and as needed for maintenance and monitoring of the Project. The Project will be operated remotely with no permanent on-site operations personnel. No changes are proposed to the existing electrical generation assets or operations as part of the Project.

The City of Escondido is the lead agency for the Proposed Project. An Initial Study has been prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] §21000 et seq.) and the State CEQA Guidelines (Title 14, California Code of Regulations [CCR] §15000 et seq.) and has determined that preparation of a Mitigated Negative Declaration would be appropriate under CEQA.

#### **Project Construction**

Project construction includes demolition of the existing facility, site preparation and grading, installation of drainage and retention basins, foundations/supports, setting battery enclosures, wiring and electrical system installation, and assembly of the accessory components including inverter transformers and generation step-up transformers. Earth cut and fill are proposed to be balanced within the Project site such that no import of fill material or export of *in situ* material is proposed. Due to unknown site conditions beneath the existing infrastructure, this may need to be modified after demolition operations. Up to 30,000 cubic yards of material may need to be imported if site conditions require mitigation. Further, it is anticipated that approximately 5,000 cubic yards of surfacing (asphalt and/or open graded crushed rock aggregate) and trench fill material will be required.

The proposed Project estimates that utility/cable installation will require trenching up to five feet, foundations will require excavation of up to six feet for the main power transformer near the existing transformer, with shallower depths being sufficient for other transformers, while driven/drilled pile foundations will extend approximately 12 feet below





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grade. Additionally, if an additional storm-drain is needed, it would likely extend to approximately the same depths as the existing storm drain.

#### Location and Setting

The approximately 6.5-acre Project Site is located at 555 Tulip Street, assessor's parcel number (APN) 232-131-25-00, within Escondido, California, 92626 (Figure 1). The Project Site currently contains a non-operational ice-rink and a 50 MW natural gas power plant. Project facilities will be constructed within the existing ice-rink and parking facilities and adjacent to the natural gas power plant facilities, which will remain. This includes an area of approximately 4.5 acres. Phase 1 proposes to use a majority of the existing parking area as laydown and an offsite laydown facility would be located within two miles of the project site, if required for Phase 2 construction.





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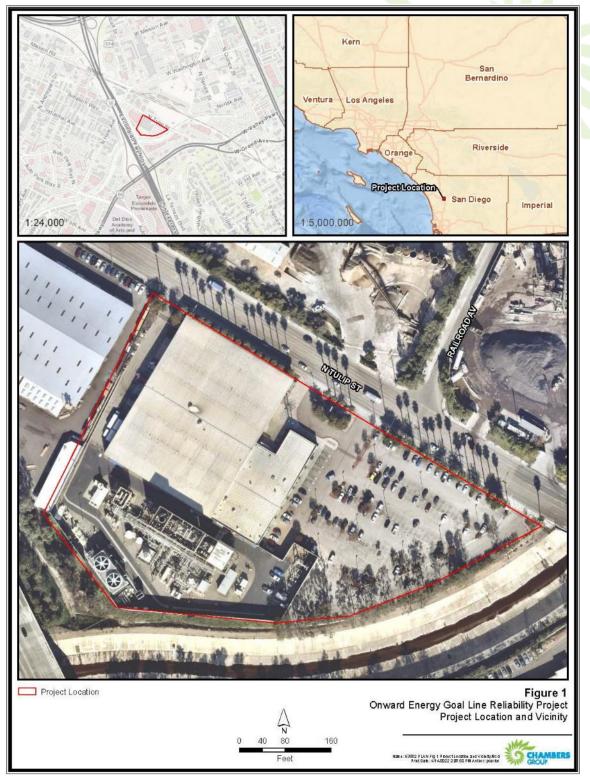


Figure 1: Project Location





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# Regulatory Context

As the lead agency for the Proposed Project, the City of Escondido must comply with the provisions of CEQA, which requires a lead agency to determine whether a project may have a significant effect on historical resources (PRC Section 21084.1). In addition to State regulations, projects built in the City of Moorpark are also subject to a number of local regulations relating to historical resources. Chapter 15.36 of the Moorpark Municipal Code pertains specifically to historic preservation within the city. The regulatory framework as it pertains to cultural resources under CEQA has been detailed below.

Under the provisions of CEQA, including the CEQA Statutes (PRC §§ 21083.2 and 21084.1), the CEQA Guidelines (Title 14 CCR § 15064.5), and PRC § 5024.1 (Title 14 CCR § 4850 et seq.), properties expected to be directly or indirectly affected by a proposed project must be evaluated for eligibility for listing in the California Register of Historical Resources (CRHR, PRC § 5024.1).

The purpose of the CRHR is to maintain listings of the State's historical resources and to indicate which properties are to be protected, to the extent prudent and feasible, from material impairment and substantial adverse change. The term *historical resources* includes a resource listed in or determined to be eligible for listing in the CRHR; a resource included in a local register of historical resources; and any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (CCR § 15064.5[a]). The criteria for listing properties in the CRHR were expressly developed in accordance with previously established criteria developed for listing in the National Register of Historic Places (NRHP). The California Office of Historic Preservation (OHP 1995:2) regards "any physical evidence of human activities over 45 years old" as meriting recordation and evaluation.

### California Register of Historic Resources

A cultural resource is considered "historically significant" under CEQA if the resource meets one or more of the criteria for listing in the CRHR. The CRHR was designed to be used by State and local agencies, private groups, and citizens to identify existing cultural resources within the state and to indicate which of those resources should be protected, to the extent prudent and feasible, from substantial adverse change. The following criteria have been established for the CRHR. A resource is considered significant if it:

- 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; or
- 4. has yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting one or more of the above criteria, historical resources eligible for listing in the CRHR must retain enough of their historic character or appearance to be able to convey the reasons for their significance. Such integrity is evaluated in regard to the retention of location, design, setting, materials, workmanship, feeling, and association.

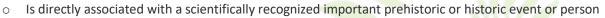
Under CEQA, if an archeological site is not a historical resource but meets the definition of a "unique archeological resource" as defined in PRC § 21083.2, then it should be treated in accordance with the provisions of that section. A *unique archaeological resource* is defined as follows:

- 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:
  - $\circ~$  Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information
  - Has a special and particular quality, such as being the oldest of its type or the best available example of its type





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Resources that neither meet any of these criteria for listing in the CRHR nor qualify as a "unique archaeological resource" under CEQA PRC § 21083.2 are viewed as not significant. Under CEQA, "A non-unique archaeological resource need be given no further consideration, other than the simple recording of its existence by the lead agency if it so elects" (PRC § 21083.2[h]).

Impacts that adversely alter the significance of a resource listed in or eligible for listing in the CRHR are considered a significant effect on the environment. Impacts to historical resources from a proposed project are thus considered significant if the project:

(1) physically destroys or damages all or part of a resource;

(2) changes the character of the use of the resource or physical feature within the setting of the resource, which contributes to its significance; or

(3) introduces visual, atmospheric, or audible elements that diminish the integrity of significant features of the resource.

#### Assembly Bill 52

Assembly Bill (AB) 52 was enacted in 2015 and expands CEQA by defining a new resource category: tribal cultural resources. AB 52 establishes that "a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (PRC Section 21084.2). AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified. AB 52 requires that lead agencies "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." Native American tribes to be included in the process are those that have requested notice of projects proposed in the jurisdiction of the lead agency. It further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3). PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and meets either of the following criteria:

- Listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k)
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1 (in applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe)

#### Local

In addition to State regulations, projects built in the City of Escondido are also subject to a number of local regulations relating to historical resources. Section J of Chapter VII of the City of Escondido General Plan (City of Escondido 2012) pertains specifically to historic preservation within the city.

#### City of Escondido General Plan

Goals and policies regarding Cultural Resources within the City of Escondido General Plan (City of Escondido 2012) include the following:

**GOAL 5**: Preservation of important cultural and paleontological resources that contribute to the unique identity and character of Escondido.

**Cultural Resources Policy 5.1**: Maintain and update the Escondido Historic Sites Survey to include significant resources that meet local, state, or federal criteria.





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# **Cultural Resources Policy 5.2**: Preserve significant cultural and paleontological resources listed on the national, State, or local registers through: maintenance or development of appropriate ordinances that protect, enhance, and perpetuate resources; incentive programs; and/or the development review process.

**Cultural Resources Policy 5.3**: Consult with appropriate organizations and individuals (e.g., South Coastal Information Center of the California Historical Resources Information System, Native American Heritage Commission, Native American groups and individuals, and San Diego Natural History Museum) early in the development process to minimize potential impacts to cultural and paleontological resources.

**Cultural Resources Policy 5.4**: Recognize the sensitivity of locally significant cultural resources and the need for more detailed assessments through the environmental review process.

**Cultural Resources Policy 5.5**: Preserve historic buildings, landscapes, and districts with special and recognized historic or architectural value in their original locations through preservation, rehabilitation (including adaptive reuse), and restoration where the use is compatible with the surrounding area.

**Cultural Resources Policy 5.6**: Review proposed new development and/or remodels for compatibility with the surrounding historic context.

**Cultural Resources Policy 5.7**: Comply with appropriate local, State, or federal regulations governing historical resources.

**Cultural Resources Policy 5.8**: Consider providing financial incentives, and educational information on existing incentives provided by the federal government to private owners and development in order to maintain, rehabilitate, and preserve historic resources.

**Cultural Resources Policy 5.9**: Educate the public on the City's important historic resources in increased awareness for protection.

#### City of Escondido Landmark Criteria

Prior to granting a resource Local Register or Historical Landmark status, the City Council shall consider the definitions for historical resources and historical districts and shall find that the resource conforms to one or more of the criteria listed below. A structural resource proposed for the Local Register shall be evaluated against criteria number one (1) through seven (7) and must meet at least two of the criteria; signs proposed shall meet at least one (1) of the criteria numbered eight (8) through ten (10); landscape features shall meet criterion number eleven (11); archaeological resources shall meet criterion number twelve (12). Local Register resources proposed for Local Landmark designation shall be evaluated against criterion number thirteen (13). The criteria are as follows:

- Escondido historical resources that are strongly identified with a person or persons who significantly contributed to the culture, history, prehistory, or development of the City of Escondido, region, state or nation;
- 2) Escondido building or buildings that embody distinguishing characteristics of an architectural type, specimen, or are representative of a recognized architect's work and are not substantially altered;
- 3) Escondido historical resources that are connected with a business or use that was once common but is now rare;
- 4) Escondido historical resources that are the sites of significant historic events;
- 5) Escondido historical resources that are fifty (50) years old or have achieved historical significance within the past fifty (50) years;
- 6) Escondido historical resources that are an important key focal point in the visual quality or character of a neighborhood, street, area or district;





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- Escondido historical building that is one of the few remaining examples in the city possessing distinguishing characteristics of an architectural type;
- 8) Sign that is exemplary of technology, craftsmanship or design of the period when it was constructed, uses historical sign materials and is not significantly altered;
- 9) Sign that is integrated into the architecture of the building, such as the sign pylons on buildings constructed in the Modern style and later styles;
- 10) Sign that demonstrates extraordinary aesthetic quality, creativity, or innovation;
- 11) Escondido landscape feature that is associated with an event or person of historical significance to the community or warrants special recognition due to size, condition, uniqueness or aesthetic qualities;
- 12) Escondido archaeological site that has yielded, or may be likely to yield, information important in prehistory;
- 13) Escondido significant historical resource that has an outstanding rating of the criteria used to evaluate local register requests. (Ord. No. 2000-23, § 4, 9-13-00; Ord. No. 2008-16, § 4, 7-16-08).

### **Environmental Setting**

The project is located within the coastal foothills of northern San Diego County within the watersheds of Reidy and Escondido creeks. The project area is flat, with an elevation of approximately 640 feet above mean sea level (AMSL). Geologically, the project area is primarily underlain by old alluvial flood-plain deposits from the late to middle Pleistocene, and by younger alluvial deposits from Reidy and Escondido creeks (Kennedy and Tan 2007; Tan and Kennedy 1999). It should be noted that the current configuration of Reidy Creek is not reflective of its natural course, in particular as it relates to the Project site. Analysis of historic aerial imagery and USGS topographic maps indicate that Reidy Creek once bisected the Project site on its way to merging with Escondido Creek. The mouth of Reidy Creek was eventually diverted approximately 290 m (950 ft.) east-northeast, and the creek bed, along with Escondido Creek, were channelized between 1964 and 1967. Thus, while recent topological and geologic maps indicate Reidy Creek coursing east of the Project site and joining Escondido Creek upstream, historic aerials and topographic maps record the confluence immediately proximate to the Project site, suggesting a possibly greater presence of young alluvial deposits within the Project area than mapped.

Soils within the Project site are mapped as Visalia sandy loam, 2 to 5 percent slopes (USDA 2022). The Visalia series of soils is characterized by moderately well-drained, very deep sandy loams and are formed from granitic alluvial deposits (Bowman 1973). Visalia soils generally support vegetation such as annual grasses, chamise (*Adenostoma fasciculatum*), flattop buckwheat (*Eriogonum fasciculatum*), California live oak (*Quercus agrifolia*) and scrub oak (*Quercus berberidifolia*) (Bowman 1973). As a prominent feature, Escondido Creek, with its associated riparian setting and nearby foothills, would have provided an excellent seasonal water source and storehouse for local Native American populations, providing food, medicine, resources for tools and ceremonial items (Bean and Shipek 1978; Hedges and Beresford 1986)

### Cultural Setting

#### Prehistoric Overview

The prehistoric cultural sequence in northern San Diego County is generally conceived as comprising three basic periods: (1) the Paleoindian Period, dated between about 11,500 and 8,500 years ago; (2) the Archaic Period, lasting from about 8,500 to 1,500 years ago (A.D. 500); and (3) the Late Prehistoric Period, lasting from about 1,500 years ago to historic contact (i.e., A.D. 500 to 1769) and represented by the Cuyamaca and San Luis Rey Complexes.

#### 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,





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crescentics, elongated bifacial knives, and leaf-shaped projectile points. The most thoroughly investigated San Dieguito component in San Diego County is found at CA-SDI-149 (the C.W. Harris site), located on a terrace overlooking the San Dieguito River. The San Dieguito Complex is thought to represent an early emphasis on hunting (Warren et al. 1993).

#### 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. Archaic assemblages in interior northern San Diego County have been designated as the Pauma Complex. The La Jolla and Pauma complexes have very similar assemblages and are thought to be different environmental adaptations of the same culture (True 1958).

Both La Jolla and Pauma Complex assemblages suggest a generalized subsistence focus with an emphasis on hard seeds. This emphasis is indicated by the increased frequency of slab and basin metates and the adoption of a mixed cobble/core-based tool assemblage composed primarily of crudely made choppers, scrapers, and cobble hammerstones. For coastal La Jolla Complex sites, large deposits of marine shell argue for the importance of shellfish gathering to the coastal Archaic economy.

Pauma Complex sites are typically found on terraces or ridges above a water source such as a stream. They often do not have discernible midden development, but they may have subsurface deposits. While they typically have numerous portable metates and manos, they lack bedrock milling and mortars and pestles (True and Waugh 1981).

There seems to have been some reorientation in settlement from coastal to inland settings during the latter portion of this period in northern San Diego County. This settlement shift appears to have occurred around 4,000 years ago and is thought to relate to the final phases of Holocene sea level rise and the resulting siltation of coastal lagoons. Prior to this time, the lagoons had been highly productive sources of shellfish for La Jollan people (Gallegos 1987; Warren et al. 1993).

#### Late Prehistoric Period

The late prehistoric archaeology of the San Diego coast and foothills, beginning approximately 1,500 years ago, is characterized by two major complexes: The San Luis Rey and the Cuyamaca. The definition of the San Luis Rey complex was based primarily on excavations near Pala, about 10 miles north-northwest of the Project Area. The San Luis Rey complex is thought to represent the ancestors of the ethnographic Luiseño (True 1966, 1970) who arrived in northern San Diego County as part of the large series of coastward migrations of Shoshonean speakers, sometimes called the Takic Wedge (Meighan 1954; Waugh 1986). San Luis Rey I is characterized by slab metates and mortars, both of which can be found in shaped and unshaped, bedrock and portable configurations. Cremations, bone awls, and stone and shell ornaments are also prominent in the material culture. In San Luis Rey II assemblage, pottery cooking and storage vessels, and cremation urns, polychrome pictographs appear. Chipped stone arrow points are dominated by the Cottonwood Triangular series, but Desert Side-notched, Dos Cabezas Serrated, leaf-shaped, and stemmed styles also occur.

The Cuyamaca complex is primarily known from the work of D. L. True at Cuyamaca Rancho State Park. The Cuyamaca complex is characterized by the presence of steatite arrow shaft straighteners, steatite pendants, steatite *comales* (heating stones), Tizon Brown Ware 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.

#### Ethnographic Overview

The Project site lies within a transitional area traditionally occupied by the Luiseño, so called after their historic-period association with Mission San Luis Rey (Bean and Shipek 1978) and the Kumeyaay, or Diegueño, named after their association with the Mission San Diego de Alcalá (Luomala 1978).





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### Luiseño

The Luiseño are the most southwesterly of the Shoshonean or Uto-Aztecan speakers. Luiseño territory encompassed much of northern San Diego and Orange Counties, extending south from Orange County to approximately Carlsbad, and generally easterly to Warner's Ranch, where it intersected with Cupeño and Cahuilla territories, in northern San Diego County.

Luiseño settlement systems have been carefully reconstructed on the basis of extensive ethnographic and ethnohistoric research (Bean and Shipek 1978; Kroeber 1925; Sparkman 1908; Strong 1929; White 1963). White (1963) suggested that the average inland rancheria had a territory of approximately 30 square miles. He suggested that the Luiseño settlement system consisted of a series of villages or rancherias located on terraces above a valley bottom watercourse (e.g., the San Luis Rey River). The rancheria owned territory in a contiguous strip leading from the valley bottom to upland areas. This vertical pattern of rancheria territory facilitated gathering plant foods through the year. In early spring, tubers and berries first ripened along the watercourse below the rancheria. As spring turned to summer, chaparral plants near the rancheria became ripe. Later, those at a higher elevation above the rancheria ripened. In fall, the people moved temporarily to higher elevations (e.g., Palomar Mountain) for the acorn harvest (White 1963).

The material culture among the ethnohistorically known Luiseño encompassed a wide range of tools made of locally available and also imported materials. A simple shoulder-height bow for hunting was made of mesquite or willow. Arrows had either fire-hardened wood or flaked stone points. Numerous other flaked stone tools were made including scrapers, choppers, flake-based cutting tools, and bifacial knives. Preferred stone types were locally available metavolcanics, quartz, and chert. Obsidian was imported from the deserts to the north and east. Ground stone objects include mortars and pestles typically made of fine-grained granite. Mortars are associated with grinding acorns, although a variety of other materials were processed in them as well (Yohe et al. 1991). Simple basin metates and cobble manos were also used for grinding grass seeds and other items. Shaped metates were not known until the arrival of the Spanish (Kroeber 1925; Sparkman 1908). The manufacture and use of native ceramic vessels were also common and was used in part by True (1993), and True and Waugh (1981, 1982, 1983) to distinguish the pre-ceramic San Luis Rey I period from the later San Luis Rey II period.

#### Kumeyaay

The Kumeyaay were the predominant Native American people occupying the southern three-fourths of San Diego county at the time of European contact in the late eighteenth century were the. Eighteenth-century Spanish explorers and settlers used the collective term "Diegueño" for these people, which referred to bands living near the presidio and mission of San Diego de Alcalá. Today, members of the tribe prefer to be called Kumeyaay (Luomala 1978).

The territory of the Kumeyaay extended north from Todos Santos Bay near Ensenada, Mexico to the mouth of the San Luis Rey River in north San Diego County, and east to the Sand Hills bordering Imperial Valley. The Kumeyaay occupied the southern and eastern desert portions of the territory, while the Ipai inhabited the northern coastal region (Luomala 1978).

The primary source of subsistence for the of Kumeyaay was vegetal food. Seasonal travel followed the ripening of plants from the lowlands to higher elevations of the mountain slopes. Buds, blossoms, potherbs, wild seeds, cactus fruits, and wild plums were among the diet of both groups. The Kumeyaay practiced limited agriculture within the floodplain areas of their territory. Melons, maize, beans, cowpeas, and teparies were planted. Women sometimes transplanted wild onion and tobacco plants to convenient locations and sowed wild tobacco seeds. Deer, rodents, and birds provided meat as a secondary source of sustenance. Families also gathered acorns and piñon nuts at the higher altitudes. Village locations were selected for seasonal use and were occupied by exogamous, patrilineal clans. Three or four clans would winter together and then disperse into smaller bands during the spring and summer (Luomala 1978).

Kumeyaay structures varied with the seasons. Summer shelter consisted of a wind break, tree, or a cave fronted with rocks. Winter dwellings had slightly sunken floors with dome-shaped structures made of brush thatch covered with grass and earth (Gifford 1931; Luomala 1978).





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Upon death, the Kumeyaay cremated the body of the deceased. Ashes were placed in a ceramic urn and buried or hidden in a cluster of rocks. The family customarily held a mourning ceremony one year after the death of a family member. During this ceremony, the clothes of the deceased individual were burned to ensure that the spirit would not return for his or her possessions (Gifford 1931; Luomala 1978).

It is estimated that the pre-contact Kumeyaay population living in this region ranged from approximately 3,000 (Kroeber 1925) to 9,000 (Luomala 1978). Beginning in 1775, the semi-nomadic life of the Kumeyaay began to change as a result of contact with European-Americans, particularly from the influence of the Spanish missions. Through successive Spanish, Mexican, and Anglo-American control, the Kumeyaay people were forced to adopt a sedentary lifestyle and accept Christianity (Luomala 1978). As of 1968, Kumeyaay population was somewhere between approximately 1,322 (Shipek 1972, included in Luomala 1978) and 1,522 (Luomala 1978).

#### **Historic Overview**

Post-European contact history for the state of California is generally divided into three periods: the Spanish Period (1540–1822), the Mexican Period (1822–1848), and the American Period (1848–present). Briefly, and in very general terms, the Spanish Period encompassed the earliest historic-period explorations of the West, followed by colonization, missionization and proselytization across the western frontier later during their occupation. The Spanish Period witnessed the establishment of pueblos such as Los Angeles and Monterey and a line of missions and presidios with attendant satellite communities, minor prospecting, and a foundational economic structure based on nascent ranchos and cattle herds, and a ship-based trade and exchange system. The Mexican Period initiated with a continuation of the same Spanish structures; however, commensurate with the political changes that led to the establishment of the Mexican state the missions and presidios were secularized, the lands parceled into ranchos, and Indian laborers released from Church lands only to be conscripted into the ranchos. Increased global trade introduced both foreign and American actors into the Mexican economic and political spheres, and both coincidentally and purposefully, smoothing the transition to the American Period. The American Period was ushered in, following the conclusion of the Mexican-American War of 1846, with a momentous influx of people seeking fortune in the Sierra foothills where gold was "discovered" in 1848. By the early 1850s people from all over the globe had made their way to California. Expansive industries were required to supply the early mining operations, such as forestry products and food networks. Grains, poultry, cattle, and water systems, which were initiated in the early Mexican Period, were intensified into a broad system of ranches and supply networks. Additionally, this period witnessed the development and expansion of port cities to supply hard goods and clothes, animals, and people transported along improved trail and road networks throughout the interior regions of the state. California cycled through boom and bust for several decades until World War I when the Department of the Navy began porting war ships along the west coast. Subsequently, California has grown, and contracted, predominantly around military policy along the west coast, and the Pacific Ocean. Following the industrial expansion related to World War II and the Cold War, technology and systems associated have come to fore as economic drivers.

#### City of Escondido

Escondido is located in northern San Diego County, approximately 30 miles north of downtown San Diego and 18 miles east of the Pacific Ocean. The community is situated in a natural valley at approximately 615 feet above mean sea level (MSL) and surrounded by rolling hills and rugged terrain ranging up to 4,200 MSL. Escondido is bounded on the north by the unincorporated communities of Valley Center and Hidden Meadows, on the west by the City of San Marcos, on the south by Lake Hodges and the City of San Diego, and on the east by unincorporated San Diego County. Interstate 15 bisects Escondido in a north-south direction and State Route 78 transitions from freeway to surface streets in an east-west direction through the community (City of Escondido 2012).

Most of Escondido occupies the former Rancho Rincon del Diablo ("Devil's Corner") which was given to Juan Bautista Alvarado in 1843 by Mexican Governor Manuel Micheltorena (City of Escondido 2012; Escondido History Center 2022). Following the signing of the Treaty of Guadalupe Hidalgo, ending the Mexican–American war the Public Land Commission, established to review land grant claims, and patent legitimate applications confirmed Alvarado's patent





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in 1872; however, by then the rancho had already been sold to a San Diego judge, Oliver S. Witherby in the 1850s, who sold it to John, Matthew, and Josiah Wolfskill and Edward McGearey in 1868 (Helix 2020). In 1886, the Escondido Land and Town Company acquired the land grant, laid out the town site, and divided the valley into small farms suitable for grapes or citrus. Several model homes were built for prospective residents to temporarily locate while looking for property to buy. A branch line of the Santa Fe Railroad was extended to the community in 1887. Escondido was incorporated as San Diego County's fourth municipality, and California's 78th city, on October 8, 1888 (City of Escondido 2012). Escondido remained a rural community within the county through the first half of the twentieth century, and only when Highway 395 was completed in the 1950s, was there a major corridor between Escondido and San Diego. With convenient access established, population and development in the region boomed, and housing subdivisions began replacing the many citrus groves and vineyards (Escondido History Center 2019). In time, Escondido's position matured to become inland Northern San Diego County's center for retail, services, health care and cultural facilities while maintaining a special feeling of small-town living. (City of Escondido 2012).

#### **Methods of Review**

Chambers Group requested a records search from the California Historical Resources Information System (CHRIS) South Coastal Information Center (SCIC) at California State University, San Diego on September 19, 2022. The SCIC returned the records search results on October 3, 2022, providing information on all documented cultural resources and previous archaeological investigations within 0.5-mile radius of the Project site. A 0.5-mile study area was requested to provide additional context to the Project site and surrounding area and more information on which to base this review. Resources consulted during the records search conducted by the SCIC included the NRHP, California Historical Landmarks (CHL), California Points of Historical Interest (CPHI), Caltrans Historic Highway Bridge Inventory, the California State Historic Resources Inventory, local registries of historic properties, and a review of available Sanborn Fire Insurance maps as well as historic photographs, maps, and aerial imagery. The task also included a search for potential prehistoric and/or historic burials (human remains) evident in previous site records and/or historical maps. In addition, Chambers Group submitted a request to the Native American Heritage Commission (NAHC) for a review of the Sacred Land Files (SLF) for the Project site and surrounding vicinity. Results of the records search and additional research are detailed below and included in Attachment A.

Additionally, on September 19, 2022, Chambers Group requested a paleontological records search from the San Diego Natural History Museum (SDNHM). This information was requested with the intent to provide further context related to the paleontological sensitivity of the area based on known fossil locations identified within the Project site or 0.5-mile study area. The paleontological records provide insight into what associated geological formations are more likely to contain fossils as well as the associated depths and placement of the known fossil locals relative to the geological formations in the area. On September 30, 2022, Chambers Group received the results of the records search. The results show that no known fossil localities lay directly within the proposed Project site.

#### Cultural Resources Reports within the Study Area

Based on the records search conducted by the SCIC, 20 cultural resource studies have previously been completed within the 0.5-mile records search radius. Table 1 provides further details of these 20 studies, of which, four encompass the Project site in some manner. These projects are bolded and italicized in the table below.





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#### Table 1: Previous Cultural Resources Studies within the 0.5-Mile Study Area

Report Number	Year Allfnor		Title	Resources	Within Project Boundary?	
SD-00783	1986	Cheever, Dayle, and Dennis Gallegos	Cultural Resource Survey of the La Terraza Project Escondido, California	1	No	
SD-04301	1980	Banks, Thomas, and David M. Van Horn	Archaeological Survey Report: The Proposed Escondido Auto Park in the City of Escondido, California	37-000153, 37-000154, 37-000156, 37-001035, 37-001505, 37-005501, 37-005502, 37-005503, 37-005504	No	
SD-04909	1985	County of San Diego	Historic Property Survey Report Escondido Transit Center, San Diego County, CA		No	
SD-08588	1980	City of Escondido	Draft Environmental Impact Report for Expansion of Wastewater Treatment Facility		Yes	
SD-08596	1992	Keller Environmental Associates, Inc	Appendices-Reclaimed Water Distribution System Project: Draft Environmental Impact Report		Yes	
SD-08729	1989	Mitchell, Patricia	The Oceanside to Escondido Rail Project		No	
SD-09546	2001	Guerrero, Monica, Dennis Gallegos, Tracy Stropes, Steve Bouscaren, Susan Bugbee, and Richard Cerreto	Cultural Resource Test Report for Oceanside- Escondido Rail Project Oceanside, California		No	
SD-09622	2005	Mason, Roger, Evelyn Chandler, and Cary Cotterman	Cultural Resources Record Search and Field Survey Report for a Verizon Telecommunications Facility: Valley Parkway, Escondido, San Diego County, California		No	
SD-10352	2006	Robbins-Wade, Mary	Lowe's General Plan Amendment - Escondido Case Numbers: ER 2005-40, 2005-02-GPA, 2005- 58/PD/CP/CZ, Tract 946 Cultural Resources (AFFINIS Job No. 2089)	37-005210, 37-006726, 37-006727, 37-006728, 37-006729, 37-007785	No	
SD-12039	2007	Guerrero, Monica, and Dennis R. Gallegos	Cultural Resources Monitoring Report for the North County Transit District (NCTD) Sprinter Rail Project Oceanside to Escondido, California	37-012095, 37-012096, 37-012097, 37-015576, 37-015595	No	
SD-12394	2009	Pierson, Larry J.	A Historical Assessment of 1050 West Washington Avenue, Escondido, San Diego County, California, APN 228-250-17		No	
SD-12835	2010	Robbins-Wade, Mary	Escondido Ballpark- Cultural Resources Survey		No	
SD-14328	2013	Wilson, Stacie	Letter Report: ETS 20872 Cultural Resources Monitoring for TL6956 Undergrounding Trench Excavation, City of Escondido, California- IO 200414230		No	
SD-14394	1983	Donald A. Cotton Associates	Survey Report on Historic/ Cultural Resources City of Escondido		No	
SD-15266	2015	David Brunzell	Cultural Resources Assessment of the Westside Park Project, Escondido, San Diego County, California (BCR Consulting Project No. TRF1434)		No	
SD-15868	2014	Wills, Carrie D., and Sarah A. Williams	Cultural Resource Records Search and Site Visit Results for AT&T Mobility, LLC Candidate SD1870 (Escondido Transit Center), 520 West Gannon Place, Escondido, San Diego County, California		No	
SD-16896	2016	Smith, Brian F., and Kristen R. Reinicke	Historic Structure Assessment for 852 Metcalf Street Escondido, California APN 228-220-22		No	
SD-17233	2017	Brunzell, David	San Diego 129 Project, San Diego County, California (BCR Consulting Project No. SYN1622)		No	





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#### Table 1: Previous Cultural Resources Studies within the 0.5-Mile Study Area

Report Number	Year	Author	Title	Resources	Within Project Boundary?
SD-17339	2015	Robbins-Wade, Mary, and Nicole Falvey	Recycled Water Easterly Main and Tanks Project and Brine Line, Broadway to Hale Avenue Resource Recovery Facility (HARRF) Project - Cultural Resources Study	5	Yes
SD-18976	2020	Cooley, Theodore G., and Mary Robbins-Wade	City of Escondido Brine Line Project - Cultural Resources Monitoring		Yes

Two reports on proposed projects within parcels immediately north of the Project site were reviewed to identify any salient information that may inform this review of what may be identified below the existing built environment. Reports by Affinis (2010) and Helix (2020) involve parcels approximately 350 to 530 m north-northeast of the Project site and exhibit similar environmental parameters that define the Project site.

Affinis (2010 – SCIC report number SD-12835) briefly reported on a proposed Escondido Ballpark project located approximately 530 m north-northeast of the current proposed Project. Among other already developed areas, the proposed Ballpark project involved a proposed off-site parking lot situated on approximately 10.3 acres of generally undeveloped land immediately north of the train depot, reported as the City storage yard (APN: 232-090-72-00). This parcel was surveyed by Affinis, who did not identify any archaeological materials. Affinis did, however, note that "there is some potential for subsurface cultural resources, due to some alluvial deposition from Escondido Creek" (Affinis 2010:4). Affinis also noted that their record search returned a number of prehistoric period sites recorded by Malcolm Rogers. Rogers noted a few of the sites were in an excellent situation for habitation, though there was sparce evidence of intensive use, suggesting the reason for such was due to their location along the boundary between Luiseño and Kumeyaay territories (Affinis 2010).

Helix (2020) reported on a proposed City of Escondido infrastructure project that would utilize the City storage yard (APN: 232-090-72-00) identified in the Affinis 2010 report for the proposed Escondido Ballpark project. This project is located approximately 350 m north-northeast of the proposed Goal Line Project. The project would consist of an approximately 25,000-square foot Membrane Filtration Reverse Osmosis (MFRO) facility housed in a commercial/industrial-like building and would connect to the existing influent pipeline located adjacent to the Escondido Creek concrete-lined Flood Control Channel along the southern side of the project site. The project area was surveyed and the reported noted that the property was highly disturbed, with areas containing equipment, storage containers, spoils piles, as well as hardscape and buildings. Much like the earlier Affinis report, no cultural resources were identified during the survey.

#### Previously Recorded Cultural Resources within the Study Area

Based upon the records search conducted by the SCIC, one previously recorded cultural resource was recorded within the 0.5-mile records search radius (Table 2). The resource, an isolated mano fragment and lithic flake, was not located within the Project area. A map of the record search results is included in Attachment A.





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#### Table 2: Previously Recorded Cultural Resources within the 0.5-Mile Study Area

Primary Number	Trinomial	Resource Names	Site Description	Within Project Boundary?
37-015577	N/A	N/A	Granitic mano fragment, porphyritic flake	No

#### **Background Research Results**

In addition to the records search review, Chambers Group archaeologists completed extensive background research to determine if any additional historic properties, landmarks, bridges, or other potentially significant or listed properties are located within the Project footprint or 0.5-mile study area. This background research included, but was not limited to, the NRHP, California State Historic Property Data Files, California State Historical Landmarks, California Points of Historical Interest, Office of Historic Preservation Archaeological Determinations of Eligibility, historic aerial imagery accessed via NETR Online, Historic U.S. Geological Survey topographic maps, Built Environment Resource Directory (BERD), and California Department of Transportation (Caltrans) State and Local Bridge Surveys.

As a result of the records search review and archival research, no previously recorded resources or any other listed or potentially significant properties are located within the Project site. However, 47 properties do occur outside the Project site but within the 0.5-mile study area, and are listed on the BERD inventory, and reproduced in Table 3.

APN	Address	Street Name	Year Built	NRHP/CRHR/Local Status	Within Project Boundary
232-232-05	932	West 2nd Ave	1925	7N - Needs to be reevaluated	No
232-233-16	959	West 2nd Ave	1915	7N	No
232-290-07	961	West 3rd Ave	1925	7N	No
232-282-03	969	West 3rd Ave	1886	<b>3S</b> - Appears eligible for NR through survey evaluation	No
232-282-01	989	West 3rd Ave	1920	7N	No
232-170-12	925	Grand Court	1910	35	No
233-021-01	665	West Grand Ave	1920	7N	No
233-100-18	701	West Grand Ave	1887	35	No
232-110-06	856	West Grand Ave	1890	35	No
232-220-17	869	West Grand Ave	1895	7N	No
232-061-25	559	North Hale Ave.	1930	7N	No
232-200-11	151	Howell Heights Drive	1911	35	No
232-190-20	178	Howell Heights Drive	1936	35	No
228-250-59	610	Metcalf Street	1900	7N	No
228-250-62	646	Metcalf Street	1890	<b>5S2</b> - Individual property eligible for local listing or designation	No
232-070-32	775	Metcalf Street	1920	35	No
228-250-37	945	West Mission Ave	1920	7N	No
228-250-36	957	West Mission Ave	1920	7N	No

#### Table 3: Historic Properties Listed on the BERD within the 0.5-Mile Study Area





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#### Table 3: Historic Properties Listed on the BERD within the 0.5-Mile Study Area

APN	Address	Street Name	Year Built	NRHP/CRHR/Local Status	Within Project Boundary
228-220-40	1024	West Mission Ave	1920	35	No
228-220-63	1070	West Mission Ave	1930	7N	No
228-220-72	1100	West Mission Ave	1920	7N	No
232-070-38	1105	West Mission Ave	1930	7N	No
228-220-72	1112	West Mission Ave	1941	<b>7R</b> - Identified in Reconnaissance Level Survey: Not evaluated	No
228-220-72	1110	West Mission Ave	1941	7R	No
232-070-30	1155	West Mission Ave	1934	7N	No
228-220-73	1120	West Mission Ave	1920	7N	No
229-271-07	534	North Quince Street	1935	7N	No
229-271-06	538	North Quince Street	1930	7N	No
229-271-05	546	North Quince Street	1930	7N	No
228-270-24	634	North Rock Springs Road	1920	7N	No
228-270-23	650	North Rock Springs Road	1940	7N	No
228-270-04	704	North Rock Springs Road	1938	7N	No
232-170-02	100	North Tulip Street	1903	35	No
232-110-20	116	North Tulip Street	1920	552	No
232-170-05	121	North Tulip Street	1910	7N	No
232-170-03	209	North Tulip Street	1935	552	No
232-360-14	220	North Tulip Street	1935	35	No
232-170-15	101	South Tulip Street	1900	35	No
232-220-19	152	South Tulip Street	1925	7N	No
232-281-10	245	South Tulip Street	1915	7N	No
232-281-18	225	South Tulip Street	1900	7N	No
232-290-09	312	South Tulip Street	1895	35	No
228-270-48	738	West Washington Ave	1890	35	No
232-070-37	1100	West Washington Ave	1940	7R	No
N/A	N/A	Highway 395 (P-37- 033557)	1910	Unknown	No
229-331-10	238	North Quince Street	1953- 1964	<b>6Z</b> - Found ineligible for NR, CR or Local designation through survey evaluation	No





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#### Native American Heritage Commission Sacred Lands File Search

On September 19, 2022, Chambers Group requested that the Native American Heritage Commission (NAHC) conduct a search of its Sacred Lands File (SLF) to determine if resources important to Native Americans have been recorded in the Project footprint and buffer area.

As of the date of this report, no responses have been received; however, it is noted that a 2020 cultural resources survey project located approximately 350 m north-northeast returned a positive finding from the NAHC (Helix 2020).

#### AB 52 Consultation

California Assembly Bill 52 (AB 52) was enacted in 2014 (Chapter 532, Statutes of 2014), requiring an update to Appendix G (Initial Study Checklist) of the CEQA Guidelines to include questions related to impacts to tribal cultural resources (Public Resources Code [PRC] § 21074), and establishing a formal consultation process for California tribes within the CEQA process (PRC § 21080.3.1, 21080.3.2). The bill specifies that any project may affect or cause a substantial adverse change in the significance of a tribal cultural resource would require a lead agency to "begin consultation with a California Native American tribe that is traditional and culturally affiliated with the geographic area of the proposed project." Public Resources Code § 21074 defines "tribal cultural resources" (TCR) as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and is either listed on or eligible for the California Register of Historical Resources or a local historic register, or if the lead agency chooses to treat the resource as a tribal cultural resource. As a Lead Agency the City of Escondido may be required to conduct AB 52 consultation with requesting tribal groups on a government-to-government basis.

PRC § 21074 defines a resource as a TCR if it meets either of the following criteria:

- 1. sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a tribe that are listed, or determined to be eligible for listing, in the national or state register of historical resources, or listed in a local register of historic resources; or
- 2. a resource that the lead agency determines, in its discretion, is a tribal cultural resource

As of the date of this report, Chambers Group staff understand that AB 52 consultation between the City of Escondido and requesting tribal governments with respect to the Project have yet to take place. Once notification is made pursuant to AB 52 and if consultation is requested, this report can be supplemented with the results.

#### Paleontological Resources

On September 30, 2022, Chambers Group received the results of the paleontological records search from the SDNHM. The results indicate that no fossil localities lay within a half-mile radius of, or directly within the Proposed Project site. Per the SDNHM, the Project site is underlain at the surface by late Pleistocene- to Holocene-age young alluvial flood plain deposits (generally less than 11,700 years old) associated with the historical flood plain of Escondido Creek, which generally do not contain fossil material. However, these sediments overlay middle to late Pleistocene-age (approximately 774,000 to 11,700 years old) old alluvial flood plain deposits, which have produced impressive collections of terrestrial vertebrate fossils including pond turtle, passenger pigeon, hawk, mole, rabbit, gopher, squirrel, capybara, wolf, horse, camel, deer, bison, mastodon, mammoth, and ground sloth. Early Cretaceous-age intrusive igneous rocks (e.g., granodiorite) likely underlie these surficial deposits at unknown depths within the Project site. Intrusive igneous rocks, and generally do not preserve or contain fossil materials due to their formational processes.

Based on the records search results the paleontological sensitivity is considered by the SDNHM to be low for upper surface sediments dating to the late Pleistocene to Holocene period, and increasing to a moderate status within middle to late Pleistocene deposits that underlay the Project site. It should be noted that, the SDNHM determination above notwithstanding, Tan and Kennedy (1999) mapped the Project site, and nearby surrounding surface areas, as older alluvial river deposits dating to middle to late Pleistocene. Tan and Kennedy did not map younger alluvial or colluvial





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sediments overlaying the Pleistocene deposits within the Project site, except along the Escondido Creek margin. No fossil localities are expected to be identified within the basement granitic bedrock underlying the region.

#### Survey

No on-ground survey of the Project site was conducted by a Chambers Group archaeologist or paleontologist. This decision was based on existing conditions at the Project site, being nearly completely covered in hardscape or building footprint, with minimal exposure of on-site sediments. These exposures are primarily limited to three-to-one and two-to-one tapered margins along the Project site perimeter and are generally ensconced in ornamental landscaping. Other Chambers Group staff did attend an on-site meeting whereby several existing condition photographs were taken, including ground surfaces where exposed. Review of these photographs illustrate results typical of engineered surfaces to be used for landscaping and other permeable surface purposes. Sediments appear homogeneous, frequently with inclusions of crushed rock gravel, and appear typical of mixed materials prepared for finish grading prior to project construction.

#### Discussion

Chambers Group conducted a cultural resources records search and literature review within the Goal Line Reliability Project site and surrounding study area in October 2022. The purpose of the review was to gather and analyze information needed to assess the potential for impacts to cultural resources within the proposed Project area. In addition, Chambers Group evaluated whether the Project would result in impacts to cultural resources that would warrant additional studies, including a site visit or field survey.

An archival records search through the SCIC of the CHRIS database and a background study of the Project site were conducted as part of the study. In addition, Chambers Group submitted a search request of the NAHC SLF to determine the presence or absence of data regarding any known sacred lands or similar resources previously reported within the Project area or surrounding vicinity. The SCIC records search identified four cultural resources reports that encompassed the Project site in some fashion, and identified no cultural resources within the Project site. None of the reports appear to have required access to the Project site as part of a visual inspection survey, or similar program. The NAHC SLF search results have not been received at the time of this report. It is noted, however, a recent NAHC SLF search request for a project located approximately 350 m north-northeast resulted in **positive** findings within that search radius (Helix 2020). The location and nature of these results have not been disclosed.

A review of the Helix report (2020) indicates that the project site subject to that study, located approximately 350 m north-northeast, and the Project site under this review are part of the same geological past and exhibit the same general landform history. While Helix did not identify any prehistoric or historic-period cultural resources, or any paleontological resources during their investigation, their background research did note the San Luis Rey Band of Mission Indians have indicated that sensitive discoveries have occurred immediately north of the Escondido Creek channel, and that the project area is considered sensitive to the tribe. The Rincon Band of Luiseño Indians also indicated that although there were no tribal cultural resources identified on the Helix project site, there is the potential for the proposed project to impact unknown tribal cultural resource.

Based on the review of available historic maps and aerial imagery the Project site was previously used for agricultural purposes, and no particular development (e.g., residential, or agricultural buildings) are noted within the Project site prior to 1953 (NETRonline 2022). A series of small buildings had been developed along the northern edge of the Project site (along Tulip Street) sometime between 1953 and 1964. Additionally, as noted above, Reidy Creek's convergence with Escondido Creek was redirected upstream of its original location along the parcel's southern boundary. The removal of the creek and subsequent development of the Project site would have necessitated the filling in of the old creek bed. This appears to have been done following the channelization of both Reidy and Escondido creeks, and was certainly completed by 1978, when the Project site was being used in part for temporary storage. By 1987 the buildings along Tulip Street had been removed, and by 1993 the parcel appears to have been cleared of all surface encumbrances. The vertical extent of this clearance cannot be determined by the aerial photograph, nor whether the surface sediments





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represented cleared at-grade materials, or raised, imported materials. The 1994 aerial indicates that the parcel had been developed into its current configuration (NETRonline 2022). Similarly, historic United States Geological Survey (USGS) topographic maps appear to indicate that the area was not developed until the issuance of the 1968 7.5-minute Escondido quadrangle (USGS 1948, 1968).

Due to the nature of construction in the middle twentieth century, the circa 1960 buildings constructed along Tulip Street were likely erected without major excavation; that is, without resorting to intensive ground-disturbing activities associated with more recent cut-and-fill or over-excavation (over-ex) construction methods. Therefore, the nature of the previous disturbance may have allowed for native soils and geologic formations below these surficial disturbances to remain intact, preserving any potentially buried cultural and paleontological resources.

By the 1990s geotechnical engineering of potentially unstable or unconsolidated sediments was usually required prior to construction of buildings and structures supporting human occupation and use. Documents on file with the City of Escondido indicate that the existing project was reviewed by the City of Escondido between 1992 and 1993, and developed shortly thereafter (City of Escondido n.d.). Unfortunately, results from the SCIC did not include data that indicate that the parcel was surveyed prior to construction, nor that a cultural resources monitoring program was executed during construction. The City of Escondido (n.d.) documents give some indication of the level of cultural resources activities that may have been included prior to or during construction of the Arroyo Energy LTD. Partners Icefloe Center (Ice Floe) Project (also known as the Ice-plex building) (City of Escondido n.d.). Three references within the discretionary permit application record are of particular note. As part of the Mitigated Negative Declaration Initial Study Part II, docketed during the January 14, 1993, City Council meeting, Comment 19 notes "Archaeological/Paleontological: The proposal will not result in the alteration of a significant archaeological or historical site, structure, object, or building since no resources currently exist on the site (City of Escondido n.d.:220). No attending archaeological investigation is cited or attached, and as indicated above, records relating to this project do not appear to have been submitted to the SCIC.

During a later City Council meeting further evidence regarding the disposition of cultural resources was made in the City Analysis document that noted:

A Mitigated Negative Declaration, City Log No. ER 92-49 was issued on January 14, 1993. Mitigation measures agreed to by the applicant were developed to reduce the potential for adverse impacts with respect to air quality, noise, light and glare, natural resources, human health, traffic volumes, utilities, and aesthetics. A copy of the Mitigated Negative Declaration is included within this staff report (City of Escondido n.d.:175).

By omission, this analysis appears to indicate that adverse effects to cultural resources were determined not to be significant, and the project was not in need of mitigation measures to lessen effects to less than significant. However, a requirement (number 27) was issued under the adopted Encroachment Permit General Provisions document which stated:

Archaeological: The permitee shall cease work in the vicinity of any archaeological resources that are revealed. The Permit Engineer shall be notified immediately. A qualified archaeologist retained by the permitee will evaluate the situation and make recommendations to the Permit Engineer concerning the continuation of the work (City of Escondido n.d.:331).

This latter statement appears to indicate that archaeological monitoring was not required during project construction. Again, no monitoring results report appears to have been filed with the SCIC.

Grading plans for the Ice Floe project state that the project site was to accommodate 5.750 cy (cubic yards) of cut, which was to be balanced with 6,340 cy of fill, along with the import of 700 cy of off-site materials. Per language in the Mitigated Negative Declaration Initial Study Part II filed during the January 14, 1993, City Council meeting Comment 1 noted:





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Earth: The development of the site will necessitate the movement of approximately 10,000 cubic yards of earth. Grading of the site will be performed in a manner that ensures a balance of cut/fill. All grading and subsequent compaction of the site, as necessary. will be per City standards and to the satisfaction of the City Engineer (City of Escondido n.d.:210).

While noting that all fill materials must be compacted to 95 percent, the Ice Floe project grading plans do not provide clarity of where or how deep any cut and fill, or import were planned. Some inference can be made by comparing the proposed finished grade plans within the Ice Floe project plan set with the existing site topography map filed during the February 10, 1993, City Council meeting (City of Escondido n.d.:172). Such review indicates that the finished grade for the Ice Floe project site was elevated generally one-foot above existing grade, and flattened in a broad, flat topography. The only reference to any particular depth of excavation is noted on profile drawings for utility installation related to sewer and storm drain alignments. A sewer profile illustrated the flow-line between 626 feet and 624 feet AMSL, while the storm drain profile illustrated a slope between 629 feet and 621 feet AMSL (Grading plans for the Arroyo Energy LTD. Partners Icefloe Center Project). These represent cuts of approximately nine to 17 feet below surface, depending on location. Unfortunately, however, the grading plans do not detail depth of trenching for foundations, footings, minor utilities, or similar excavations usually necessary to support construction such as the Ice Floe project.

The proposed Project estimates that utility/cable installation will require trenching up to five feet, foundations will require excavation of up to six feet for the main power transformer near the existing transformer, with shallower depths being sufficient for other transformers, while driven/drilled pile foundations will extend approximately 12 feet below grade. Additionally, if an additional storm-drain is needed, it would likely extend to approximately the same depths as the existing storm drain.

Similarly, because the existing development at the Project site appears to be founded on an engineered sediment base of undetermined thickness, it is difficult to ascertain to what depth intact old alluvial (middle to late Pleistocene) deposits may be encountered. Tan and Kennedy (1999) did map the underlying area as old alluvial river deposit formation, and this formation should be expected to be encountered at any depth where not previously impacted. The SDNHM has indicated that this formation has demonstrated an elevated capacity for preserving paleontological materials. As such, encountering paleontological resources during Project construction should be considered possible.

#### Recommendations

It is apparent that the proposed Project site had been subject to changes in both use and in setting. The past agricultural use may have disturbed only the uppermost sediments, while the circa 1960 buildings located along Tulip Street near Escondido Creek may have required minor grading to level and clear the land for construction. The abandonment of Reidy Creek and later clearance of the land for use as temporary storage may have resulted in the burial of undisturbed sediments along the former creek alignment. The circa 1994 Ice Floe development of the Project site into its current configuration appears to have been carried out under well-practiced CEQA guidelines and building codes of the day; however, apart from available project construction plans illustrating only finished grade, documentation resulting from project construction, such as a monitoring report (which was not required as a condition of project approval - see discussion above), appears not to be available for review at this time. As a result, little data, such as as-built documents or over-ex grading requirements for soil conditioning and unification, is readily available to consult. This results in a poor understanding of whether or not the Proposed Project will extend below this assumed, but unknown depth of prior construction. Similarly, per grading plans for the prior Ice Floe project, approximately 700 cy was to be imported onto the project site; however, there appears to be little known data at available to describe the type and condition of the fill soil while it was incorporated into the site. (The concern being that it cannot be determined whether or not this fill soil may have contained artifactual materials removed from another location prior to deposition and incorporation into the Ice Floe project site. This was an issue, though rare, with projects at various times in the past prior to the best practices taken today.)





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Based on the results of the records search review and background research, Chambers Group suggests that there is potential to encounter intact buried native formations. The depths of these potential intact native formations remain unknown. In addition to intact native formations there is also the potential to encounter buried archaeological and paleontological resources. Similarly, consultation with Native American groups may indicate the presence of additional significant resources. Chambers Group recommends formal discussion with tribes requesting consultation under AB 52 legislation.

Because data at present are insufficient to declare with certainty that cultural and paleontological resources will not be encountered during project construction Chambers Group recommends the following mitigation measures be considered and implemented to reduce potential impacts to cultural resources to less than significant. If additional information is obtained with more specific details regarding the previous or current subsurface conditions within the Project site, that information will be incorporated in a Cultural Resources Monitoring Program (CRMP) and Paleontological Mitigation Plan (PMP). The relevant additional information may be included through obtaining and reviewing documentation with more detailed evidence regarding the past development and associated ground disturbance at the site or through additional studies performed related to the Project, such as geotechnical analysis related to advanced design. The CRMP and PMP, particularly if relevant additional information is obtained, will allow for more tailored and focused monitoring and mitigation programs to be prepared, in concert with the City and participating tribes. If cultural resources are identified, these would need to be evaluated for eligibility for the CRHR. Evaluation for archaeological sites may consist of an archaeological testing program. If determined eligible by the CEQA lead agency or the State Historic Preservation Office, mitigation, consisting of data recovery for archaeological sites, would be required if avoidance or preservation is not feasible.

- CUL-1 If requested by one or more participating tribes, it is recommended the City of Escondido Planning Division (City) should enter into a Tribal Cultural Resource Treatment and Monitoring Agreement (also known as a pre-excavation agreement) with a tribe that is traditionally and culturally affiliated with the Project Location (TCA Tribe) prior to issuance of a grading permit. The purposes of the agreement are (1) to provide the applicant with clear expectations regarding tribal cultural resources; and (2) to formalize protocols and procedures between the City and the TCA Tribe for the protection and treatment of, including but not limited to, Native American human remains; funerary objects; cultural and religious landscapes; ceremonial items; traditional gathering areas; and cultural items located and/or discovered through a monitoring program in conjunction with the construction of the Proposed Project, including additional archaeological surveys and/or studies, excavations, geotechnical investigations, grading, and all other ground disturbing activities.
- **CUL-2** Prior to issuance of a grading permit, the City shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (U.S. Department of the Interior, 2008) to prepare the CRMP in coordination with participating tribe(s). The CRMP will include any additional information that can be utilized to determine the appropriate monitoring program. The qualified archeologist and Native American monitors associated with a TCA Tribe will implement the monitoring program, as described in the CRMP. Because the Project is located within shared territory of the Luiseño and Kumeyaay people, Native American monitors representing the interest and values of both the Luiseño and Kumeyaay people shall be retained for the project. The archaeologist shall be responsible for coordinating with the Native American monitor. This verification shall be presented to the City in a letter from the qualified archaeologist that confirms that Native American monitors representing both Luiseño and Kumeyaay TCA Tribes have been retained. The City, prior to any pre-construction meeting, shall approve all persons involved in the monitoring program.





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- **CUL-3** The qualified archaeologist and, if requested by the participating tribe(s), a Native American monitor shall attend the pre-grading meeting with the grading contractors to explain and coordinate the requirements of the monitoring program.
- **CUL-4** As required by the CRMP, the qualified archaeologist and the Native American monitor shall be on site during the initial grubbing, site grading, excavation or disturbance of the ground surface, . The CRMP shall include protocols for monitoring and, if available, shall include any additional information and related monitoring procedures for specific areas of the Project site that have been previously disturbed. The frequency of inspections shall depend on the rate of excavation, the materials excavated, and any discoveries of tribal cultural resources as defined in California Public Resources Code Section 21074. Archaeological and Native American monitoring will be discontinued when the depth of grading and soil conditions no longer retain the potential to contain cultural deposits. The qualified archaeologist, in consultation with the Native American monitor, shall be responsible for determining the duration and frequency of monitoring.
- **CUL-5** In the event that previously unidentified cultural resources that qualify as historical, unique archaeological, and/or tribal cultural resources are discovered, the qualified archaeologist and the Native American monitor shall have the authority to temporarily divert or temporarily halt ground disturbance operation in the area of discovery to allow for the evaluation of potentially significant cultural resources. Isolates and clearly non-significant deposits shall be minimally documented in the field and collected so the monitored grading can proceed.
- **CUL-6** If a potentially significant historical, unique archaeological, and/or tribal cultural resource is discovered, the qualified archaeologist shall notify the City of said discovery. The qualified archaeologist, in consultation with the City, the TCA Tribe and the Native American monitor, shall determine the significance of the discovered resource. Recommendations for the resource's treatment and disposition shall be made by the qualified archaeologist in consultation with the TCA Tribe and the TCA Tribe and the Native American monitor and be submitted to the City for review and approval.
- **CUL-7** The avoidance and/or preservation of significant cultural resources that qualify as historical, unique archaeological, and/or tribal cultural resources must first be considered and evaluated as required by CEQA. Where any significant resources have been discovered and avoidance and/or preservation measures are deemed to be infeasible by the City, then a research design and data recovery program to mitigate impacts shall be prepared by the qualified archaeologist (using professional archaeological methods), in consultation with the TCA Tribe and the Native American monitor, and shall be subject to approval by the City. The archaeological monitor, in consultation with the Native American monitor, shall determine the amount of material to be recovered for an adequate artifact sample for analysis. Before construction activities are allowed to resume in the affected area, the research design and data recovery program activities must be concluded to the satisfaction of the City.
- **CUL-8** As specified by California Health and Safety Code Section 7050.5, if human remains are found on the project site during construction or during archaeological work, the person responsible for the excavation, or his or her authorized representative, shall immediately notify the San Diego County Coroner's office. Determination of whether the remains are human shall be conducted on-site and in situ where they were discovered by a forensic anthropologist, unless the forensic anthropologist and the Native American monitor agree to remove the remains to an off-site location for examination. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Coroner has made the necessary findings as to origin and disposition. A temporary construction





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exclusion zone shall be established surrounding the area of the discovery so that the area would be protected, and consultation and treatment could occur as prescribed by law. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant, as identified by the Native American Heritage Commission, shall be contacted in order to determine proper treatment and disposition of the remains in accordance with California Public Resources Code section 5097.98. The Native American remains shall be kept in-situ, or in a secure location in close proximity to where they were found, and the analysis of the remains shall only occur on-site in the presence of a Native American monitor.

**CUL-9** If the qualified archaeologist elects to collect any archaeological materials that qualify as tribal cultural resources, the Native American monitor must be present during any testing or cataloging of those resources. Moreover, if the qualified archaeologist does not collect the archaeological materials that qualify as tribal cultural resources that are unearthed during the ground disturbing activities, the Native American monitor, may at their discretion, collect said resources and provide them to the TCA Tribe for respectful and dignified treatment in accordance with the Tribe's cultural and spiritual traditions. The project archaeologist shall document evidence that all cultural materials have been curated and/or repatriated as follows:

1) It is the preference of the City that all tribal cultural resources be repatriated to the TCA Tribe as such preference would be the most culturally sensitive, appropriate, and dignified. Therefore, any tribal cultural resources collected by the qualified archaeologist shall be provided to the TCA Tribe. Evidence that all cultural materials collected have been repatriated shall be in the form of a letter from the TCA Tribe to whom the tribal cultural resources have been repatriated identifying that the archaeological materials have been received.

OR

2) Any tribal cultural resources collected by the qualified archaeologist shall be curated with its associated records at a San Diego curation facility or a culturally-affiliated Tribal curation facility that meets federal standards per 36 CFR Part 79, and, therefore, would be professionally curated and made available to other archaeologists/ researchers for further study. The collection and associated records, including title, shall be transferred to the San Diego curation facility or culturally affiliated Tribal curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence that all cultural materials collected have been curated shall be in the form of a letter form the curation facility stating the prehistoric archaeological materials have been received and that all fees have been paid.

- **CUL-10** Prior to the release of the grading bond, a monitoring report and/or evaluation report, if appropriate, which describes the results, analysis and conclusion of the archaeological monitoring program and any data recovery program on the project site shall be submitted by the qualified archaeologist to the City. The Native American monitor shall be responsible for providing any notes or comments to the qualified archaeologist in a timely manner to be submitted with the report. The report will include California Department of Parks and Recreation Primary and Archaeological Site Forms for any newly discovered resources.
- **PAL-01** Prior to issuance of a grading permit, the applicant shall retain the services of a qualified paleontologist to remain on-call for the duration of the proposed ground disturbing construction activity. The paleontologist selected must be approved by the appropriate City/Lead Agency representative. The qualified paleontologist may also be a qualified archaeologist. Upon approval or request by the City, a paleontological mitigation plan (PMP) outlining procedures and protocols for paleontological monitoring





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and data recovery shall be prepared for the Proposed Project and submitted to the City for review and approval. The development and implementation of the PMP shall include any additional information that can be utilized to determine the appropriate monitoring program, consultations with the applicant's engineering geologist, as well as a requirement that the curation of all specimens recovered under any scenario shall be through an appropriate repository agreed upon by the City. All specimens become the property of the City unless the City chooses otherwise. If the City accepts ownership, the curation location may be revised. The PMP shall include developing a multilevel ranking system, or Potential Fossil Yield Classification (PFYC), as a tool to demonstrate the potential yield of fossils within a given stratigraphic unit. The PMP shall outline the monitoring and salvage protocols to address paleontological resources encountered during ground disturbing activities. As well as the appropriate recording, collection, and processing protocols to appropriately address any resources discovered. The cost of data recovery is limited to the discovery of a reasonable sample of available material. The interpretation of reasonableness rests with the City, in consultation with the qualified paleontologist.

**PAL-02** At the completion of all ground-disturbing activities, the qualified paleontologist shall prepare a final paleontological mitigation report summarizing all monitoring efforts and observations, as performed in line with the PMP, and all paleontological resources encountered, if any. As well as providing follow-up reports of any specific discovery, if necessary. If no paleontological resources are identified during monitoring, the final reporting shall be addressed within the archaeological monitoring and/or evaluation report. A standalone paleontological mitigation report is only required if paleontological resources are encountered during monitoring.

Chambers Group is available to assist with any further support or document preparation related to Cultural Resources, including tribal consultation. Please contact Corinne Lytle Bonine, Vice President, Environmental Planning, at 858-541-2800 ext. 7100, Lucas Tutschulte, Cultural Resources Team Lead, at 858-541-2800 ext. 7114, or me at the contact information below if you have any questions or comments regarding this report.

Sincerely,

CHAMBERS GROUP, INC.

Richard D. Shultz, M.A.

*Cultural Resources Principal Investigator* 858.541.2800 Ext 7118 9620 Chesapeake Drive, Suite 202 San Diego, CA 92123

#### Attachments

Attachment A (Confidential): Record Search Results





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# Photographs



Photo 1: Existing conditions along Tulip Street. View southeast.



Photo 2: Existing conditions along Tulip Street from near the northern parcel corner. View southeast.

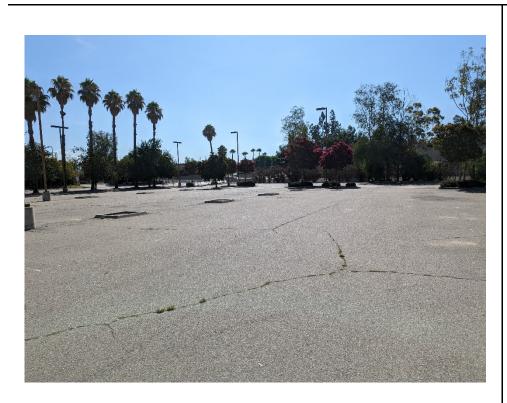


Photo 3: Existing conditions within Project site. View eastsoutheast.



Photo 4: Existing conditions within Project site along the southern boundary. View west.



Photo 5: Existing conditions within Project site along the northern boundary. View northeast.

Photo 6: Existing conditions within Project site along the northern boundary. View southeast.



Photo 7: Existing conditions within Project site along the southern boundary. View west.



Photo 8: Existing conditions immediately outside Project site near eastern parcel corner. View south.



Photo 9: Existing conditions immediately outside Project site near eastern parcel corner. View north. CONFIDENTIAL. This document is confidential under California Government Code 6254.10 and the National Historic Preservation Act, Section 304, and other applicable federal, state, and local laws and regulations prohibiting public and unauthorized disclosure of records related to cultural resources. Recipients of this document acknowledge they are authorized to receive these materials and are responsible for maintaining the confidential nature of the contents related to cultural resources identified in this document and will not disclose confidential information to the public and/or unauthorized persons.

Attachment A (Confidential): Record Search Results

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