

SECTION 3.4
CULTURAL RESOURCES

3.4 CULTURAL RESOURCES

3.4.1 INTRODUCTION

This section examines the potential impacts to cultural resources that may result from development of the proposed project and is based on a technical report entitled *A Cultural Resources Study for the SDSU 2007 Campus Master Plan Revision*, prepared by Brian F. Smith and Associates, Inc. (May 24, 2007). Because of the historic nature of the area and documented prehistoric human occupation, an archaeological survey, testing of discovered resources for significance, and archaeological records searches were undertaken. As further explained below, these studies revealed that any potential impacts to cultural resources that would result with implementation of the proposed project would be mitigated to a level below significant. The technical report is presented in its entirety in **Appendix E** of this EIR.

3.4.2 METHODOLOGY

As mentioned above, impacts to cultural resources were assessed by studying the results of archaeological surveys, historic resources inventories, and archaeological records searches. The goal of these studies was to document any archaeological or historical resources on the project site, determine their significance, evaluate impacts to the resources resulting from development of the proposed project, and propose mitigation for impacts identified as significant. The significance evaluations and impact assessments were conducted, as further discussed below, according to the California Environmental Quality Act ("CEQA"), National Register criteria in conformance with Section 106 of the National Historic Preservation Act ("NHPA"), and City of San Diego Historical Resources Guidelines.

3.4.2.1 Archaeological Survey

Archaeological surveys of cultural resources took place on October 21, 2004, February 21-22, 2007, and April 12, 2007. These surveys resulted in the identification of three prehistoric sites situated north of Interstate 8 ("I-8") near Adobe Falls. Specifically, the 2004 survey resulted in the identification of one bedrock milling feature (Site CA-SDI-17,221), and the 2007 surveys resulted in the identification of two additional bedrock milling features (Sites CA-SDI-18,326 and 18,327). The identified sites were subjected to a standard archaeological testing program, set forth in further detail below, by qualified archaeologists:

- (1) **Surface Collection:** Surface artifacts were collected, bagged, labeled, and transported to the laboratory for additional analysis.

- (2) **Subsurface Investigations:** Subsurface investigations were conducted by instituting a series of shovel test pits to confirm the nature and extent of any subsurface deposits. The shovel test pits consisted of 30 by 30 centimeter excavations that proceeded in decimeter levels downward to a minimum depth of 30 centimeters. Additionally, one-by-one meter test units were excavated, to a depth of 50 centimeters, in areas with the highest concentration of surface and subsurface artifacts. All excavated soils were sifted through one-eighth-inch mesh screens.
- (3) **Detailed Recordation of All Milling Features:** Documentation included mapping each feature in relation to the established site datum and individually measuring each bedrock feature and milling surface. The attributes of each surface were recorded on data forms developed specifically for the recordation of milling surfaces -- the length, width, and depth of each surface was noted, and the general overall characteristic of the surface (*e.g.*, slick, oval, mortar). All features were sketched and photographed as part of the recordation process.
- (4) **Significance Evaluations:** The significance evaluations were made pursuant to the criteria enumerated below in **Section 3.4.4.**

3.4.2.2 Historic Resources Inventory

Standing structures are the most obvious resources on the campus. For this reason, a review of all registered historic resources was necessary to separate those that could be historically significant from those that had little or no potential for significance. This was accomplished in two ways: first, a field reconnaissance was conducted to identify any buildings that were potentially significant historic sites on the basis of architecture and apparent age; and second, historic registry lists were reviewed to identify structures previously registered.

Four registered landmarks lie within the SDSU campus: (i) the San Diego State Teacher's College; (ii) the Aztec Bowl; (iii) the State Historic Landmark location of President Kennedy's honorary doctorate; and (iv) the Adobe Falls City of San Diego Historical Landmark ("Adobe Falls"). However, the project design and layout is not within the vicinity of the first three registered landmarks, and only has the potential to impact the Adobe Falls. The Aztec Center, Maya and Olmeca Residence Halls, and the two residential structures that make up the Office of Housing Administration and Residential Education were identified during the field reconnaissance as potentially significant historic resources.

3.4.2.3 Archaeological Records Search

Archaeological records searches were conducted at the South Coastal Information Center ("SCIC") at SDSU on October 25, 2004 and February 22, 2007. These searches identified several previously registered cultural resources within the proposed project's footprint or within one mile of the project center. Specifically, two isolated artifacts (a single quartzite core from the Adobe Falls area and a metate with associated shellfish remains in the canyon below Lot U), and previously discussed Site CA-SDI-17,221 were identified as registered cultural resources.

3.4.3 PROJECT SETTING/EXISTING CONDITIONS

The proposed project includes the development of classroom and research facilities; housing for students, faculty and staff; and, the development of new, and expansion of existing, meeting space on approximately 55 acres of the SDSU campus in San Diego, California. The SDSU campus lies within the unsectioned ex-Mission Lands of Mission San Diego de Alcalá, Township 16 South, Range 2 West of the San Bernardino Meridian. (See **Figure 2.0-2, Project Location Map.**)

In prehistoric times, both archaic and late prehistoric peoples used this area. By late prehistoric times, the area around Adobe Falls, a natural waterfall along the Alvarado Creek drainage, was important for its floral and faunal resources, as well as fresh water. The wetlands around Adobe Falls and throughout the Mission Valley area, as well as the marine resources in San Diego and Mission Bays, comprised an environment rich in varied food and fresh water resources available throughout most of the year. At the time of the first European colonization (1769) and throughout the Spanish Colonial, Mexican, and early American pioneer periods, Adobe Falls and Mission Valley were important resource areas for both Native Americans and Europeans. Although early urban development of the area precluded any accurate assessment of archaeological deposits resulting from human use of this part of San Diego, historic descriptions of late prehistoric villages and early mission life indicate that this was an important activity area.

During the historic period, from the late 18th century until the middle of the 19th century, the region was used for agricultural purposes. A small cobblestone dam at the top of Adobe Falls provided water to the gardens of Mission San Diego de Alcalá through a ditch and a tile aqueduct. Later the falls produced water for early agriculture in the Grantville area. After secularization of Mission San Diego de Alcalá, the Davies Family, who raised dairy cattle,

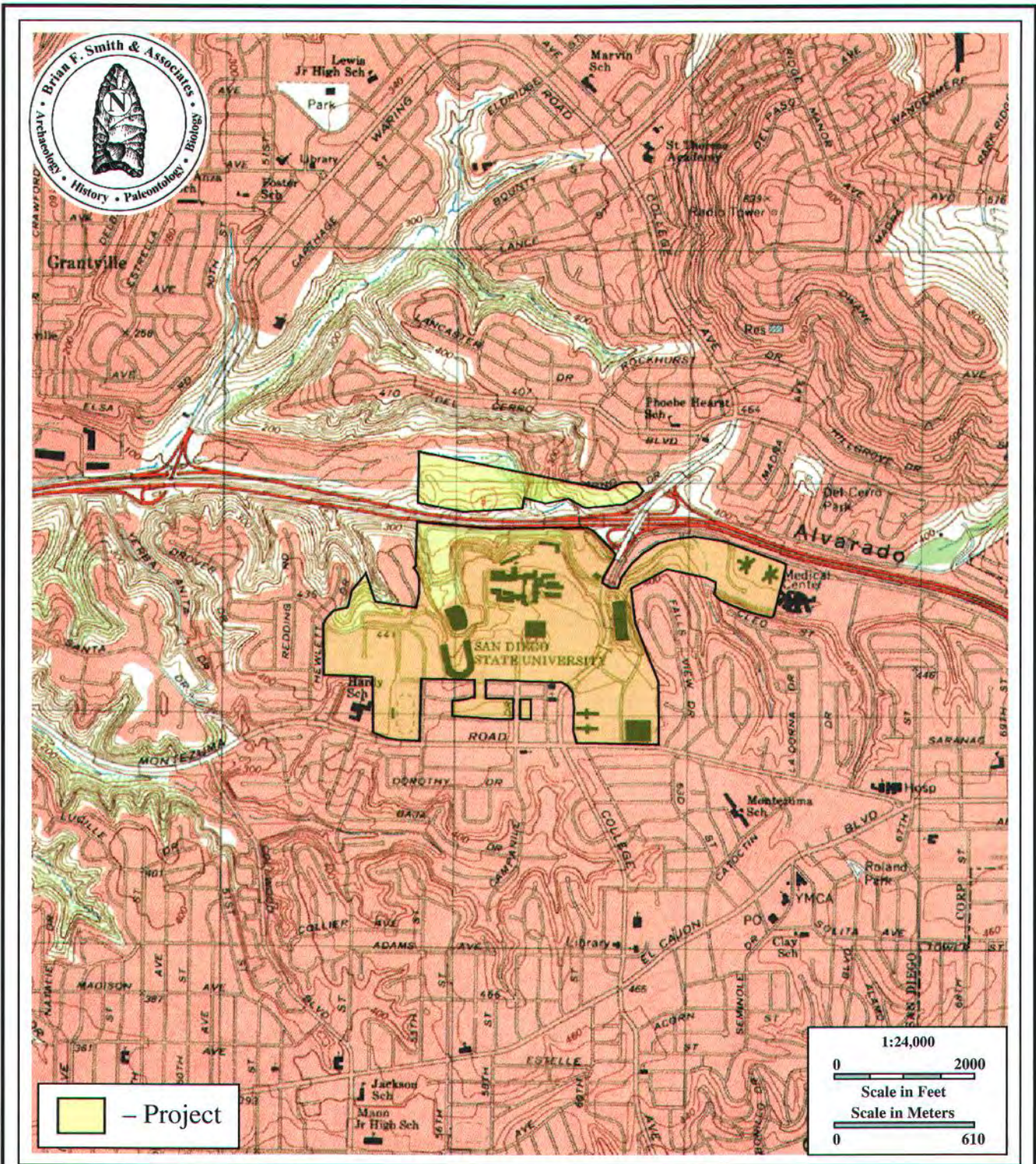


Figure 2.0-2
Project Location Map
 The SDSU 2007 Campus Master Plan Revision
 USGS *La Mesa* Quadrangle (7.5 minute series)

olives, and produced olive oil, used the Mission lands and may have found the water in Alvarado Creek useful. Farming continued in this part of the city until expansion changed the character of land use in Mission Valley/Grantville and on the mesa to the south. By at least the late 19th century, the springs above Adobe Falls were used as a water source by those traveling through Alvarado Canyon. The falls became a popular place for swimming in the late 19th and 20th centuries because of the several pools and year round water availability. Early in the 20th century, rural land use gave way to increased residential use of the College area. The State Normal School became the San Diego State Teacher's College and was relocated to its present site in 1931. Subsequently, the college became California State College at San Diego, and, later yet, it became San Diego State University. In 1941, San Diego State College purchased the Adobe Falls property from Madge Blunt Waring. During this period, students also used the Alvarado Creek area for study, and local community groups were frequent visitors.

The Adobe Falls were listed as City of San Diego Historic Site Number 80 in 1973. The San Diego State Teacher's College campus was listed on the National Register as a historic district in 1997. Included in that historic district, as California Landmark Number 798, is the entrance to the service area of Cox Arena, which is the location where the first doctorate was granted by the CSU system to President John F. Kennedy on the occasion of his commencement speech in 1963. Although the Aztec Bowl was listed on the National Register in 1994, in 1997, the California State Historic Preservation Officer requested that it be de-listed because the property no longer retained integrity as a result of the demolition that took place during construction of Cox Arena. The San Diego State Teacher's College National Register nomination (listed in 1997) refers to the Bowl as a non-contributor. Neither the Teacher's College National Historic District nor the Aztec Bowl will be impacted by development of the proposed project.

Today, the College area is a mixture of office, retail, and residential uses, indicative of the ever-changing needs of the university and the neighborhood around it. The university itself has changed dramatically since relocating to this site in 1931. The proposed project would continue these changes to keep pace with the changing needs of the region and of higher education provided by the university.

3.4.4 THRESHOLDS OF SIGNIFICANCE

In assessing the potential impacts of the proposed project on cultural resources, guidance is provided from three separate sources. First, consistent with CEQA's requirements relating to

the preparation of an EIR, are the significance criteria provided under the CEQA Guidelines. Second, because development of part of the proposed project may require a permit from the U.S. Army Corps of Engineers, the criteria for National Register eligibility under NHPA Section 106 are relevant. Third, because the project is located within the City of San Diego limits, the City of San Diego Resource Protection Ordinance and Historical Resources Guidelines are also relevant. Under each of these criteria, an impact that reduces the significance of a resource is an impact that requires mitigation. Conversely, if an impact does not reduce or adversely affect the significance of a resource, no mitigation is required.

Criteria for Significance under CEQA: Under CEQA Guidelines Appendix G, a proposed project would have a significant impact on cultural resources if the project would:

- (a) Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines §15064.5; or
- (b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5; or
- (c) Disturb any human remains, including those interred outside of formal cemeteries.

CEQA Guidelines §15064.5 defines a "historical resource" as including:

- (1) A resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources;
- (2) A resource included in a local register of historical resources;
- (3) A resource that meets the criteria for listing on the California Register of Historic Resources, including the following:
 - (A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
 - (B) Is associated with the lives of persons important in our past;
 - (C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
 - (D) Has yielded, or may be likely to yield, information important in prehistory or history.

CEQA applies to effects on archaeological sites if the site meets the criteria outlined above for "historical resources," or if the site is a unique archaeological resource, as defined in Public Resources Code §21083.2. If an archaeological resource is neither a unique archaeological nor

an historical resource, the effects of the proposed project on those resources shall not be considered a significant effect on the environment. (Guidelines §15064.5(c)(4).)

Criteria for National Register Eligibility under NHPA: The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

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

Criteria for Significance under City of San Diego: City of San Diego Historical Resources Guidelines provide instructions on how to address issues of significance and identify impacts, including mitigation measures for unavoidable impacts. A significant historical resource at the local level is designated as such by the City of San Diego Historical Resources Board following a determination that the site meets on or more of the following criteria:

- A. Exemplifies or reflects special elements of the City's, community's, or neighborhood's historical, archaeological, cultural, social, economic, political, aesthetic, engineering, landscaping, or architectural development.
- B. Is identified with persons or events significant in local, state, or national history.
- C. Embodies distinctive characteristics of a style, type, period, or method of construction, or is a valuable example of the use of indigenous materials or craftsmanship.
- D. Is representative of the notable work of a master builder, designer, architect, engineer, landscape architect, interior designer, artist, or craftsman.
- E. Is listed or has been determined eligible by the National Park Service for listing on the National Register of Historic Places, or is listed or has been determined

eligible by the State Historical Preservation Office for listing on the State Register of Historical Resources.

- F. Is a finite group of resources related to one another in a clearly distinguishable way, or is a geographically definable area or neighborhood containing improvements which have a special character, historical interest, or aesthetic value, or which represent one or more architectural periods or styles in the history and development of the City.

3.4.5 PROJECT IMPACTS

The cultural resources technical report proposed project evaluated the potential impacts associated with the six development components, namely: Adobe Falls Faculty/Staff Housing; Alvarado Campus; Alvarado Hotel; Campus Conference Center; Student Housing, and Student Union/Aztec Center Expansion and Renovation. A summary of the analysis is presented in **Table 3.4-1, Cultural Resources Impact and Mitigation Summary Table**, and each project component is discussed in further detail below. The technical report may be reviewed in its entirety in EIR **Appendix E**.

**Table 3.4-1
Cultural Resources Impact and Mitigation Summary Table**

Development Components	Resources Present	Significance Evaluation	Potential Impacts	Mitigation Requirements
Adobe Falls Faculty/Staff Housing	1. Adobe Falls Landmark including SDI-17,221 2. SDI-18,326 3. SDI-18,327 4. Possible buried resources	1. Significant 2. Not significant 3. Not significant 4. unknown	1. Indirect 2. Direct 3. Direct 4. unknown	1. Open Space & Monitoring* 2. Monitoring* 3. Monitoring* 4. Monitoring*
Alvarado Campus	Possible buried resources	Unknown	Unknown	Monitoring*
Alvarado Hotel	Possible buried resources	Unknown	Unknown	Monitoring*
Student Housing				
<i>Lot C</i>	Possible buried resources	Unknown	Unknown	Monitoring*
<i>Lot U</i>	Possible buried resources	Unknown	Unknown	Monitoring*
<i>Lot G</i>	Possible buried resources	Unknown	Unknown	Monitoring*
<i>Maya Hall</i>	Historic structure	Not significant	Direct	None
<i>Olmeca Hall</i>	Historic structure	Not significant	Direct	None
Res. Life Building	Historic structures	Not significant	Direct	None
Student Union	None	Not significant	None	None
Conference Center	None	Not significant	None	None

* Monitoring for potential archaeological deposits will be required as a condition of the mitigation monitoring program.

3.4.5.1 Adobe Falls Faculty/Staff Housing

The Adobe Falls Faculty/Staff Housing area contains the recorded Adobe Falls landmark. Additionally, as a result of the archaeological studies undertaken in connection with the 2005 Master Plan and 2007 Master Plan Revision, three archaeological sites have been identified in the area: CA-SDI-17,221; CA-SDI-18,326; and CA-SDI-18,327.

3.4.5.1.1 Upper Village

The Adobe Falls lie in an area that has been previously impacted by construction of two water pipelines from Lake Murray, a sewer pipeline, construction of Old Highway 80, the subsequent refinement of the old highway into Alvarado Freeway, and subsequent construction of I-8. Thus, the falls have been impacted by modern disturbances associated with the construction of I-8, other construction projects, and graffiti. However, since the Adobe Falls site remains designated as a local landmark, for purposes of this analysis it is assumed that the site remains historically significant.

Notwithstanding, implementation of the 2007 Campus Master Plan Revision would not directly impact the Adobe Falls because no development would occur in this area as the Adobe Falls site is located outside the project development area on property owned by the California Department of Transportation. Moreover, while indirect impacts to the Falls may result from the development of the site, including increased site visitation by new residents from the Upper and Lower Villages, these impacts likely would not result in any further decrease in its historic significance. However, mitigation is proposed that requires SDSU to design the Upper and Lower Villages in a manner that does not result in any direct or indirect impacts to the remaining historic significance of Adobe Falls. Therefore, the proposed project will not result in significant impacts relating to Adobe Falls.

Site CA-SDI-17,221 is a prehistoric bedrock milling feature, located on the southwest side of Alvarado Creek in the northeastern portion of the Adobe Falls project component site and is the sole bedrock milling feature located near Adobe Falls. The majority of the area surrounding the site has been completely disturbed as a result of numerous construction projects. Vegetation surrounding the site consists of riparian species and palm trees along the creek, native inland sage scrub on the slopes of the hills north of the creek, and introduced grasses and shrubs to the south and west. (See **Plate 6.0-1/6.0-2, Photographs of Area Surrounding CA-SDI-17,221.**)



Plate 6.0-1 View of Site SDI-17,221, facing west.

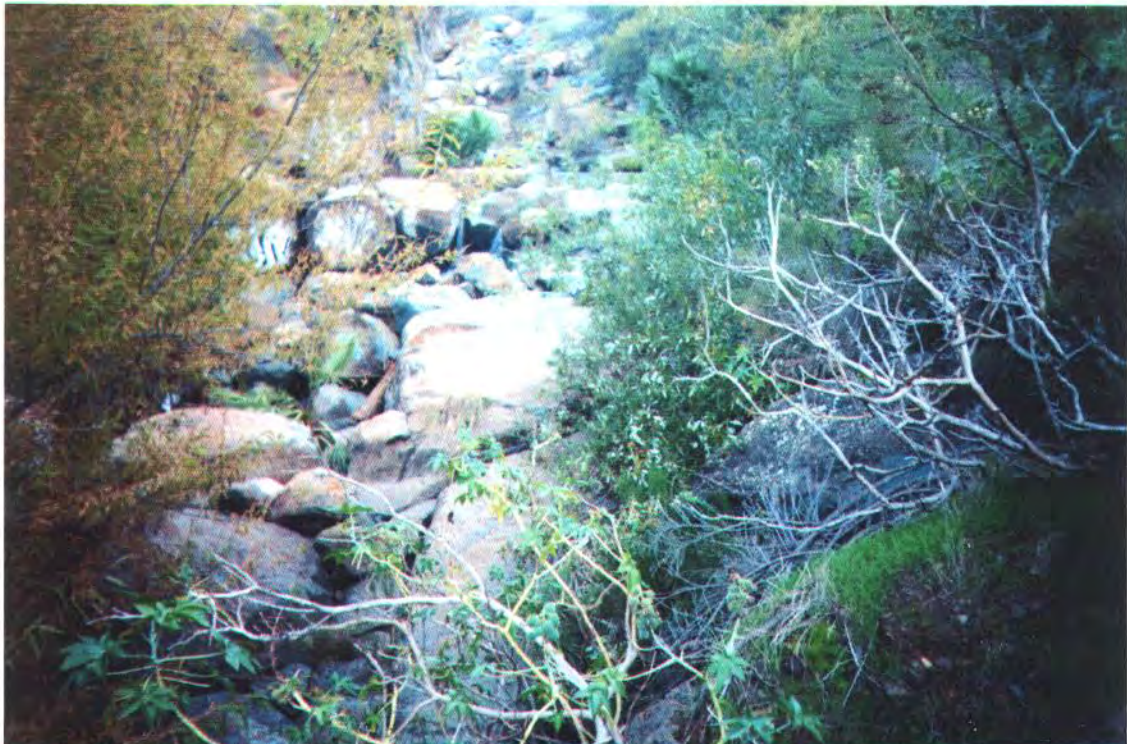


Plate 6.0-2 View of Site SDI-17,221, facing east.

An evaluation of the bedrock milling feature's surface revealed a total of eleven grinding surfaces, all slicks. These surfaces were extremely weathered, making the edges of the grinding surfaces difficult to identify. No surface artifacts were located at the bedrock milling feature. Four shovel test pits were excavated, to depths of at least 30 centimeters, to evaluate the potential for subsurface cultural deposits. These excavations did not yield any cultural material.

Despite the absence of surface artifacts and subsurface deposits, and the consequential lack of research potential, Site CA-SDI-17,221 is a significant cultural resource *via* its association with Adobe Falls and must be afforded the same protection as Adobe Falls. However, mitigation is proposed that requires SDSU to design the Upper and Lower Villages in a manner that does not result in any direct or indirect impacts to the significance of the Adobe Falls site, including Site CA-SDI-17,221. Therefore, the proposed project will not result in significant impacts to the bedrock milling feature.

3.4.5.1.2 Lower Village

Site CA-SDI-18,326 is also a bedrock milling feature, and is located on the south side of Alvarado Creek within the Lower Village grading envelope. As with Site CA-SDI-17,221, the majority of the area surrounding the site has been completely disturbed by various construction projects. The same vegetation is present at this site as at Site CA-SDI-17,221. (See **Plate 6.0-4/6.0-5, Photographs of Area Surrounding CA-SDI-18,326.**)

A surface evaluation of the bedrock milling feature for artifacts and features revealed the presence of five grinding surfaces, all slicks. Because the surfaces of the bedrock are extremely weathered, it is difficult to identify the precise edges of the grinding surfaces. An inspection of the site's surface also led to the identification of nine surface artifacts, including granite and quartzite tools, manos, flakes, and cores. Nine shovel test pits, to depths of at least 30 centimeters, failed to reveal the presence of any subsurface cultural materials. However, a single, one meter square test unit excavated to a depth of 50 centimeters did recover three lithic production waste flakes.



Plate 6.0-4 General setting, Site SDI-18,326.



Plate 6.0-5 Bedrock Milling Feature A, Site SDI-18,326.

The general absence of artifacts recovered from the surface evaluation and shovel test pits, and the sparse recovery from the test unit excavation indicates that there are no intact subsurface deposits at this site. As such, this site exhibits no unique elements, no additional research potential, and is therefore not considered a significant cultural resource. Therefore, even though this site will be directly affected by project grading and development, the impacts are not significant because CA-SDI-18,326 is *not* a significant cultural resource.

Site CA-SDI-18,327 is also a prehistoric bedrock milling site located on the south side of Alvarado Creek within the grading envelope for the proposed Lower Village. As with the previously discussed sites, this site has been completely disturbed and impacted by numerous construction projects. Vegetation at the site consists of riparian species and palm trees along the creek, native inland sage scrub on the slopes of the hills north of the creek, and introduced grasses and shrubs to the south and west. (See **Plate 6.0-7/6.0-8, Photographs of Area Surrounding CA-SDI-18,327.**)

During inspection of the site's surface for artifacts and features, a total of nine grinding surfaces, all slicks with blurred edges due to weathering, were identified. No surface artifacts were identified during the inspection. The subsurface investigation was conducted *via* the excavation of nine shovel test pits and one standard one meter square test unit. The shovel test pits did not test positive for cultural materials. The single test unit produced a very small quantity of artifacts, including flakes of quartzite and medium-grained metavolcanic rock.

In sum, the investigation of Site CA-SDI-18,327 revealed neither surface artifacts nor subsurface deposits. Since the site exhibits no intact subsurface cultural deposits and no potential for buried hearth features, the site is not unique, has no additional research potential, and is not a significant cultural resource. Therefore, the direct impacts to this bedrock milling feature that would be caused by implementation of the proposed project component are not significant because the site itself is *not* historically significant.

3.4.5.2 Alvarado Campus

The proposed Alvarado Campus site is now occupied by a complex of medical offices and research facilities, and Lot D. No structures within the site have architectural or historical significance, nor are any of the existing buildings old enough to be considered historic under CEQA, National Register, or City of San Diego criteria. As such, any potential impacts to existing structures will not be considered adverse to cultural resources. However, the proposed



Plate 6.0-7 General Setting, Site SDI-18,327.



Plate 6.0-8 Bedrock Milling Feature A, Site SDI-18,327.

project will impact Quaternary sediments associated with Alvarado Creek that may contain archaeological resources. Because of this setting, there is a chance that buried resources will be impacted during project implementation. Therefore, mitigation is proposed to require that an archaeological monitor be present during construction activities with the authority to temporarily suspend construction in the event construction activities unearth significant archaeological resources, thereby reducing any potentially significant effects to a level below significant.

3.4.5.3 Alvarado Hotel

The proposed Alvarado Hotel site is located on approximately two acres of Lot C, which is a previously graded and paved parking lot. No structures are present at this site. Accordingly, this component of the proposed project will not directly or indirectly result in a significant impact to cultural resources. However, as with the Alvarado Campus, because this project component is located beside Alvarado Creek, there is a chance for the presence of buried resources in Quaternary sediments that may be disturbed *below* the area already disturbed for the present parking lot. Therefore, mitigation is proposed that requires the presence of an archaeological monitor to reduce any potential impacts to a level below significant.

3.4.5.4 Campus Conference Center

The proposed Campus Conference Center site is located east of Cox Area and will be constructed on the site of former tennis courts. No structures are present at this site. Accordingly, there will be no direct or indirect impacts to cultural resources.

3.4.5.5 Student Housing

Lot G Residence Hall. A new residence hall is proposed for Lot G - a previously graded and paved parking lot that is not occupied by any structures. Due to the absence of historical structures or features, this proposed project component will not significantly impact cultural resources. However, Lot G is close to a primary tributary of Alvarado Creek, which raises the possibility that buried archaeological resources may exist. Based on the potential for damage to buried archaeological resources uncovered during construction-related activities, an archaeological monitor will be present during construction to mitigate potential impacts to a level below significant.

Two additional residence halls are proposed for the site now occupied by the **Maya and Olmeca Residence Halls (Plates 6.0-10/6.0-11)** and the **Office of Housing Administration and Residential Education (Plate 6.0-13/6.0-14):**

The Maya and Olmeca Residence Halls are approximately 48 years old and have an exterior brick finish that lacks adornment. These residence halls are not significant due to their lack of innovative architectural characteristics or unusual use of materials. Additionally, these residence halls have no historical connections. Therefore, the demolition of these structures is not significant.

The Office of Housing Administration and Residential Education facilities consist of two attached one-story residences of historic age. The northern-most structure is a National Folk style building that may date to the 1940s. Although it may have been a residence at one time, the structure has been moved onto the site, renovated, and expanded. The other structure is a 1950s' style building that was originally used as a residence and Home Economics training facility. The structure's original siding and windows have been replaced. These two structures are not significant because the structures have been the subjects of possible relocation, massive alterations, and a concomitant loss of integrity. Therefore, the demolition of these structures is not significant.

Lot U Residence Hall and Lot C Villa Alvarado Residence Hall Expansion. Two additional residence halls are planned for Lot U, which is located at the head of a primary tributary canyon to Alvarado Canyon, and Lot C, which is located beside Alvarado Creek near the Alvarado Campus. While neither of these projects will impact any known standing structures or archaeological sites, excavations and/or grading for these residence halls could impact sediments in environments with a high possibility for buried archaeological resources. Therefore, mitigation is proposed that requires the supervision of an archaeological monitor during construction in order to reduce any potential impacts to a level below significant.

3.4.5.6 Student Union/Aztec Center Expansion and Renovation

This project component proposes the renovation of the existing Aztec Center, and includes a 70,000 square foot expansion and the demolition of the 5,200 square foot La Tienda Building. The Aztec Center does not have any architectural or historical significance, nor is it old enough to be considered historic under any of the applicable criteria. The Aztec Center building was constructed in 1966, and the La Tienda building was constructed subsequent to that date. The La Tienda Building also does not meet the age criteria, and, due to its substantial alterations in the 1990s, no longer retains the integrity of original design. Since these buildings lack architectural or historical significance, the impacts to the structures will not be significant.



Plate 6.0-10 Olmeca Hall, facing southeast.



Plate 6.0-11 Maya Hall, facing northwest.



Plate 6.0–13 Student and Residential Life Administration facility, looking northeast at the old classroom/residence and single-family dwelling.



Plate 6.0–14 Student and Residential Life Administration facility, looking southwest at the old classroom/residence building.

3.4.6 HUMAN REMAINS

CEQA requires that if Native American human remains exist on the site of the proposed project, or if there is a probable likelihood of such existence, the lead agency must work with the Native American Heritage Commission ("NAHC") for treating or disposing of such remains. (CEQA Guidelines §15064.5(d).) A Sacred Lands File search was requested from the NAHC on February 20, 2007. The NAHC did not identify any sacred sites within one mile of the project center. At the request of the NAHC, letters were sent to representatives of local tribes requesting any information regarding sacred sites within the project area. None of the persons contacted identified any sacred lands within a mile of the project center. Nonetheless, a mitigation measure addressing the accidental discovery of any human remains on the site of the proposed project is proposed to offset any potential impacts. (Guidelines §15064.5(e).)

3.4.7 CUMULATIVE IMPACTS

Impacts to cultural resources located within the six project components include visual and physical changes. The identified resources fall into two basic categories: prehistoric and historic. The prehistoric resources within a mile of the project include three bedrock milling features identified, tested, and recorded as part of the present project and two isolates identified in the record search for this project. These resources are not considered individually significant under CEQA criteria, or the federal and local criteria. Furthermore, collectively, these resources do not present enough research potential, due to lack of variability, to be considered significant under federal, state, or local criteria. Since none of the prehistoric archaeological resources could be considered significant, individually or collectively, their loss would not constitute a cumulative adverse effect on their significance. Therefore, no cumulative impact to the environment would result from the loss of the bedrock milling features.

No direct adverse effects are anticipated to result to any of the four landmarks on campus, and only the potential for indirect adverse effects are anticipated at Adobe Falls. And, of the four historic properties on the campus, only Adobe Falls is within a proposed project area - specifically, the Adobe Falls Faculty/Staff Housing area. The majority of the Adobe Falls landmark site is located on property owned by the California Department of Transportation. The potential for adverse indirect effects to Adobe Falls, when considered in conjunction with previous adverse impacts to that resource, would not constitute a significant adverse effect if the recommended mitigation is employed. Therefore, no cumulative impact to the environment would result from the proposed project.

The four, unregistered structures that were identified as potential historic resources, and will be subject to direct impacts by the proposed project, were found to not be historically or architecturally significant either because they are not old enough to be considered historic or because they have been substantially altered and modified since first built. Because these four structures are not significant under the criteria set forth in this section, the cumulative effect of their loss would not result in an adverse effect on the environment.

3.4.8 MITIGATION MEASURES

The following mitigation measures are proposed to reduce the identified potentially significant impacts to a level below significant:

CR-1 To minimize the potential indirect effects associated with increased site visitation by residents of the Adobe Falls Faculty/Staff Housing and SDSU students to Adobe Falls, SDSU, or its designee, shall:

1. Prior to occupancy of the Upper Village, work with the San Diego Historical Society to install appropriate fencing and signage in the vicinity of the area designated as City of San Diego Historic Site Number 80, including the area designated as Site CA-SDI-17,221; and
2. Subsequently, during preparation of project-specific design plans for the Lower Village, design the Lower Village in such manner that the development does not encroach into the area designated as City of San Diego Historic Site Number 80, including the area designated as Site CA-SDI-17,221.

CR-2 Prior to the commencement of grading activities at the Adobe Falls Faculty/Staff Housing site, Alvarado Campus, Alvarado Hotel, and the Student Housing expansions at Lots C, G, and U, SDSU, or its designee, shall prepare an archaeological monitoring plan, which plan shall provide for the presence of an archaeological monitor on the site to monitor the potential discovery of historical resources. In the event that the monitoring of grading activities results in the discovery of cultural features, the archaeological monitor will have the authority to halt excavation at that location and direct that the discovery be evaluated immediately by a qualified archaeologist. Following evaluation, if the feature is determined to be an historical and/or archaeological resource within the meaning of CEQA Guidelines §15064.5, appropriate mitigation measures will be

developed at that time before grading activities at that location can resume. In the event the feature is determined to be an historical and/or archaeological resource, grading activities may continue on other parts of the building site while appropriate mitigation is implemented.

CR-3 If, during any phase of project construction, there is the accidental discovery or recognition of any human remains in any location other than a dedicated cemetery, the following steps will be taken:

1. There will be no further excavation or disturbance of the site or any nearby area reasonably suspect to overlie adjacent human remains until:
 - (a) The San Diego County Coroner is contacted to determine that no investigation of the cause of death is required; and
 - (b) If the Coroner determines the remains to be Native American:
 - (i) The Coroner will contact the Native American Heritage Commission within 24 hours;
 - (ii) The Native American Heritage Commission will identify the person or persons it believes to be the most likely descendant from the deceased Native American; and,
 - (iii) The most likely descendant may make recommendations to SDSU for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods, as provided in California Pub. Resources Code §5097.98, or
2. Where the following conditions occur, SDSU, or its designee, will rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further subsurface disturbance:
 - (a) The Native American Heritage Commission is unable to identify a most likely descendant or the most likely descendant failed to make a recommendation within 24 hours after being notified by the Commission;
 - (b) The descendant identified fails to make a recommendation; or
 - (c) SDSU, or its designee, rejects the recommendation of the descendant, and mediation by the Native American Heritage Commission fails to provide measures acceptable to SDSU.

3.4.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Under the proposed project, impacts to cultural resources will not be significant because any potentially significant impacts to Adobe Falls and the associated bedrock milling feature will be mitigated to a level of insignificance. No other additional significant historical structures or archaeological sites have been identified within the proposed project's boundaries. Additionally, implementation of an archaeological monitoring program in connection with the initial grading and excavations, along with the implementation of an appropriate notification system in the event of the discovery of human remains, will mitigate any potential impacts to buried cultural resources to a level below significant. In sum, implementation of the proposed project would not result in any significant unavoidable impacts to cultural resources.