## **APPENDIX E**

## **Cultural Resources Technical Report**

## DRAFT

## Cultural Resources Technical Report for the SDSU New Student Housing Project

Prepared for:

### San Diego State University

5500 Campanile Drive San Diego, California 92182-1624 Contact: Laura Shinn, Director

Prepared by:

Contact: Matthew DeCarlo

## DUDEK

605 Third Street Encinitas, California 92024

## **MARCH 2017**

Printed on 30% post-consumer recycled material.

## TABLE OF CONTENTS

## <u>Section</u>

## Page No.

SUMMARY OF FINDINGSIII					
1	INTR	ODUCTION	1		
	1.1	Regional and Local Setting			
	1.2	Project Description	1		
2	METH	HODOLOGY	9		
	2.1	Records Search Methods	9		
	2.2	Field Methods	9		
	2.3	Native American Participation/Consultation			
3	EXIST	TING CONDITIONS	11		
	3.1	Existing Environmental Setting	11		
	3.2	Geological and Paleontological Setting	11		
		3.2.1 Stadium Conglomerate			
		3.2.2 Mission Valley Formation			
		3.2.3 Lindavista Formation			
	3.3	Regulatory Setting			
		3.3.1 Federal			
		3.3.2 State			
		3.3.3 Local			
	3.4	Cultural Context			
		3.4.1 Paleoindian (pre-5500 BC)			
		3.4.2 Archaic (8000 BC–AD 500)			
		3.4.3 Late Prehistoric (AD 500–1750)			
		3.4.4 Ethnohistoric (post-AD 1750)			
		3.4.5 The Historic Period (post-AD 1542)			
	3.5	Archaeological Inventory			
		3.5.1 Previously Recorded Resources			
		3.5.2 Intensive Pedestrian Survey Results			
	3.6	NAHC and Tribal Correspondence			
4	THRE	ESHOLDS OF SIGNIFICANCE	43		
5	IMPACT ANALYSIS				
	5.1	Project Impacts			
6	MITIO	GATION MEASURES	53		

### TABLE OF CONTENTS (CONTINUED)

#### **Section** Page No. 7 8 S9 REFERENCES CITED **APPENDICES** SCIC Records Search Results (Confidential) А NAHC Sacred Lands File Search Results В FIGURES 1 2 3 Steep, Vegetated Canyon Dominated APE West of Chapultepec Hall. 4 5 **TABLES**

3.1	Previously Conducted Studies Within 1-Mile of APE	.31
3.2	Previously Identified Resources Within 1-Mile of APE	.35

## SUMMARY OF FINDINGS

This report presents the results of Dudek's Phase I cultural resources study for the New Student Housing Project (project) located on the San Diego State University (SDSU) campus, San Diego County, California. SDSU is proposing construction of on-campus student housing towers to be located on the existing Parking Lot 9 (formerly "U" Parking Lot) and centered around the existing Chapultepec Hall. The proposed 7.84-acres project would be located on the northwest corner of the main SDSU campus, within an unsectioned portion of the La Mesa, CA 1:24,000 U.S. Geological Survey quadrangle.

Dudek conducted an in-house records search of South Coastal Information Center (SCIC) information for the proposed project parcel and a surrounding 1-mile buffer on December 29, 2016. No resources were identified within the project area; however, 47 resources have been identified within 1 mile of the area of potential effect (APE). Sites P-37-009899 and P-37-013708 are the nearest recorded sites, located 250 feet and 530 feet east of the project area, respectively. These resources consist of a portable milling stone and the Aztec Bowl football stadium. The records search identified three previous cultural resources studies that have included the portions of the current APE. These previously conducted pedestrian surveys identified no cultural resources within the APE. Some 84 additional studies have been conducted within a mile of the current APE. A Native American Heritage Commission (NAHC) search indicates that no Traditional Cultural Properties (TCPs) or Sacred Sites have been identified to be within 1 mile of the project. SDSU and its representatives have sent letters to Native American representatives in compliance with Assembly Bill (AB) 52. To date, only the Jamul Indian Village, a Kumeyaay Nation and federally recognized Tribal Government, has responded to the AB 52 consultation letters. The Jamul Indian Village representatives did not identify any TCP within the project area nor did they make any specific request for tribal monitoring of the current project.

In addition to the archaeological records search, Dudek conducted a paleontological records search of the San Diego Natural History Museum locality database on December 30, 2016, and desktop research for the proposed project. Three geological units (from oldest to youngest) underlie the proposed project: middle Eocene (~44 to 42 million years ago) Stadium Conglomerate, middle Eocene (~42 million years ago) Mission Valley Formation, and the early to middle Pleistocene (~1.5 to 0.5 million years ago) Lindavista Formation. No paleontological localities were identified within the project area; however, five paleontological localities were identified within 1 mile of the proposed project area. Four of the localities are from the Mission Valley Formation and one is in the Stadium Conglomerate.

Dudek archaeologist Matthew DeCarlo conducted an intensive pedestrian cultural survey of the proposed project area. No cultural resources were identified within the study area. This area is unlikely to contain undocumented intact cultural deposits due to the level of past disturbance and the moderate-to-steep slope of the terrain.

Based on the results of the cultural inventory conducted for the proposed project, archaeological deposits are not anticipated, and monitoring by a qualified archaeologist is not recommended during construction. Besides archaeological deposits, impacts to tribal cultural resources should also be considered. The decision to include monitoring by Native American representatives during construction is the responsibility of the lead agency. Should previously unrecorded cultural resources or human remains be encountered by project personnel during activities related to the proposed project, mitigation measures have been provided as part of this report.

As explained below, none of the archaeological sites or resources encountered at or near the proposed project site is eligible for listing on the national, state, or local register of historical places. Likewise, none of the resources qualifies as significant historical, cultural, or archaeological resources under CEQA; nor do they constitute significant tribal cultural resources as defined under CEQA. For these reasons, the proposed project is not anticipated to cause a significant impact on any archaeological, historical, or cultural resource.

The desktop research and paleontological records search result conducted for the proposed project indicate that paleontologically sensitive geological units that will require construction monitoring to mitigate potential impacts to unique (significant) paleontological resources underlie it. Measures to mitigate the potential impacts to a level below significant are provided as part of this report.

## 1 INTRODUCTION

## 1.1 Regional and Local Setting

The campus is situated along Interstate 8 (I-8) about 10 miles from downtown San Diego (Figure 1, Regional Map; Figure 2, Vicinity Map). The proposed project would be located on a 7.84-acre site at the northwest corner of the main San Diego State University (SDSU) campus. The campus is part of the College Area Community within the City of San Diego.

The proposed project would be developed west of the SDSU academic buildings and north of the campus athletic fields. The site is defined by Remington Road to the south, 55th Street to the east, and private properties to the north and west. The proposed project area is owned by SDSU and is located within the existing campus boundary. The project is within an unsectioned portion of the La Mesa, CA 1:24,000 U.S. Geological Survey quadrangle.

The project area is partially developed (Figure 3, Project Area Map). At the southwestern edge of the project site, Parking Lot 10A borders Remington Road. Chapultepec Hall, a residence hall supporting 545 beds, is situated in the approximate middle of the site. Parking Lot 9 extends east from Chapultepec Hall and terminates at 55th Street. There is a small retail structure located between Remington Road and the southern side of Chapultepec Hall. A densely vegetated canyon dominates the western and northern portions of the project area.

## 1.2 **Project Description**

The proposed project would include the expansion of on-campus student housing facilities to be located adjacent to the existing Chapultepec Hall. Specifically, the proposed project would consist of the development of facilities to accommodate up to 2,566 student housing beds in a series of residential towers to be located on the existing Parking Lot 9 (formerly "U" Parking Lot) and centered around the existing Chapultepec Hall. SDSU would develop the proposed project in three successive phases, and SDSU's analysis will address, where applicable, the environmental impacts that could arise in each phase. In particular, Phase I would include construction of dormitory facilities to house up to 850 student housing beds on the existing Parking Lot 9, east of the existing Chapultepec Hall; Phase II would include construction of facilities to house up to an additional 850 beds in the area located to the west of the existing Chapultepec Hall; and Phase III would include construction of facilities to house up to an additional 866 beds in buildings that would cantilever over the canyon behind Chapultepec Hall. The proposed project would consist of up to eight new buildings. One building would serve as a dining hall (two stories), while the remainder of the buildings would consist of towers of single-, double-, and triple-occupancy student housing units. The complex may include outdoor gathering spaces and green space. The proposed project would entail permanent removal of the existing Parking Lot 9.

### INTENTIONALLY LEFT BLANK



**Cultural Resources Technical Report** 

**Regional Map** 

### INTENTIONALLY LEFT BLANK



SOURCE: USGS 7.5-Minute Series La Mesa Quadrangle Township 16S Range 2W Section 15

SDSU New Student Housing Project Cultural Resources Technical Report Figure 2 Vicinity Map

### INTENTIONALLY LEFT BLANK



SDSU New Student Housing Project Cultural Resources Technical Report



Figure 3 Project Area Map

### INTENTIONALLY LEFT BLANK

## 2 METHODOLOGY

The following section provides a description of methods employed to conduct the current cultural inventory.

### 2.1 Records Search Methods

Dudek GIS staff conducted a records search of files obtained from South Coastal Information Center (SCIC) for the project area and a surrounding 1-mile buffer on December 29, 2016. The records search included review of mapped prehistoric, historical and built-environment resources, Department of Parks and Recreation (DPR) Site Records, technical reports, archival resources, and ethnographic references. Additional consulted sources included the California Inventory of Historical Resources/California Register of Historical Resources (CRHR) and listed Office of Historic Preservation Archaeological Determinations of Eligibility, California Points of Historical Interest, California Historical Landmarks, and California Department of Transportation (Caltrans) Bridge Survey information. Geographic information system (GIS) maps were produced indicating the spatial relationship between known resources and possible project impacts. Historical aerial maps were also consulted using the internet database Historicaerials.com. These maps were used to determine the development history of the area and to indicate any possible development from the historic era.

In addition to the cultural resources records search mentioned above, a paleontological records search of the San Diego Natural History Museum locality database was initiated on December 30, 2016. The paleontological records search was used to determine any previously recorded paleontological localities within the proposed project area and included a 1-mile buffer around it. Coupled with the desktop research for the proposed project, the paleontological records search identified paleontologically sensitive geological units within the proposed project area.

### 2.2 Field Methods

Dudek archaeologist Matthew DeCarlo conducted an intensive pedestrian cultural survey of the proposed project area on January 4, 2017. Archaeological survey exceeded the applicable Secretary of Interior Professional Qualifications Standards for archaeological survey and evaluation. The project area of potential effect (APE) was surveyed using transects spaced no more than 15 meters apart wherever possible and oriented in cardinal directions. The archaeologist used a Global Positioning System (GPS) receiver with sub-meter accuracy to analyze the project area. Location-specific photographs were taken using an Apple 3rd Generation iPAD equipped with 8 MP resolution and georeferenced PDF maps of the project area. Accuracy of this device ranged between 3 meters and 10 meters. The archaeologist

inspected natural and artificial erosion exposures, as well as spoils from rodent burrows as a means to opportunistically locate evidence for buried cultural deposits. No artifacts were collected during the survey. The regulatory framework of this project does not require the presence of a Native American monitor during the cultural survey. The results of the records searches, discussed in **Sections 3.5.1** and **3.6**, indicated that no prehistoric resources were previously identified within the project area. For these reasons, Dudek did not request the presence of a Native American monitor during the cultural survey of the project area.

## 2.3 Native American Participation/Consultation

In *EPIC v. Johnson* (1985) 170 Cal.App. 3rd 604, the Court of Appeal held that the Native American Heritage Commission (NAHC), as a state agency with special expertise on tribal history, has jurisdiction over affected Native American resources that may be affected by proposed projects, including Native American burial sites and archaeological places of religious significance to Native Americans. On behalf of SDSU, Dudek requested a search of the NAHC Sacred Land File on December 15, 2016, to determine if any tribal cultural resources are present within 1 mile of the project area. Gayle Totton, NAHC Associate Government Program Analyst, facilitated this search and returned the results on December 19, 2016. The results of the Sacred Lands File search are discussed in **Section 3.6**. As part of the consultation process, the NAHC provided a list of tribal governments and individuals that should be consulted for compliance with Assembly Bill 52 (AB 52). Under the California Environmental Quality Act (CEQA), the lead agency is responsible for performing formal government-to-government consultation with Native American Tribes under AB 52. As lead agency, SDSU and its representatives have sent letters to the Native American representatives included on the consultation list provided by the NAHC.

## **3 EXISTING CONDITIONS**

This section describes the existing conditions in the project area and identifies the resources that could be affected by the proposed project.

## 3.1 Existing Environmental Setting

The project is located on the northern edge of a Quaternary-age alluvial marine terrace. The western and eastern limits of the project area are delineated by drainages, the western being substantially steeper than the east. SDSU's Chapultepec Hall and a bordering asphalt parking area are situated within the center and eastern portion of the project parcel. The only area with moderately suitable terrain (i.e., slightly reduced slope) for cultural resources is located within an approximate 60-meter buffer of this building. It is evident from the undulating surface topography that disturbances along this terrace area have included grading and other earth-moving activities related to the construction of Chapultepec Hall, the parking area, and slope stabilization.

## 3.2 Geological and Paleontological Setting

Determining potential impacts to significant paleontological resources during the construction phase of a project requires the analysis of the geological units within the proposed project to determine the likelihood of their yielding significant paleontological resources. The City of San Diego (2011) determined paleontological resource sensitivity ratings for the geologic formations in the City of San Diego. A high rating indicates a high probability of encountering paleontological resources; a moderate rating indicates a moderate probability of encountering paleontological resources; a low rating indicates a low probability of encountering paleontological resources; and a zero rating indicates zero probability of encountering paleontological resources.

A paleontological records search through the San Diego Natural History Museum (SDNHM) (McComas 2016), as well as desktop research, indicate that the proposed project is underlain by three geological units (from oldest to youngest): middle Eocene (~44 to 42 million years ago) Stadium Conglomerate, middle Eocene (~42 million years ago) Mission Valley Formation, and the early to middle Pleistocene (~1.5 to 0.5 million years ago) Lindavista Formation. McComas (2016) reported no previously recorded fossil localities within the proposed project area from the SDNHM database, but reported 20 fossil localities within a 1-mile buffer of the proposed project. Fifteen of the localities are from geological units not mapped within the proposed project area, and thus not expected to be impacted by construction-related earth-moving activities. The five localities reported from geological units mapped within the proposed project were within the

middle Eocene Stadium Conglomerate and Mission Valley Formation (McComas,2016). The geological units and their paleontological potential are discussed below.

#### 3.2.1 Stadium Conglomerate

The middle Eocene Stadium Conglomerate is divided into an upper and lower member consisting of poorly sorted, cobble conglomerate that is primarily terrestrial in origin (Deméré and Walsh 1993; McComas 2016). On the SDSU campus, this geological unit underlies the Mission Valley Formation. The Stadium Conglomerate has produced variably abundant and important fossil remains throughout the County of San Diego, and the SDNHM reported one locality from the lower member of the unit within 1 mile of the proposed project. The locality produced fossilized impressions or remains of terrestrial invertebrates and vertebrates, including snails, reptiles, rodents, insectivores, bats, artiodactyls, and dermopterans (flying lemurs) (McComas 2016). Because the proposed project is located south of Interstate 8 (I-8), it is possible that the upper member will be impacted by earth-moving activities, and there is potential to recover fossilized wood and mammals, such as rodents, insectivores, opossums, artiodactyls, rhinoceros, carnivores, and primates (McComas 2016). The upper and lower members of the Stadium Conglomerate have high to moderate and high paleontological sensitivity, respectively, based on the numbers of fossils recovered from outcrops within San Diego County (City of San Diego 2011; McComas 2016).

#### 3.2.2 Mission Valley Formation

The Mission Valley Formation is a fine-grained marine sandstone of Eocene age (Deméré and Walsh 1993). On the SDSU campus, within the proposed project area, the Mission Valley Formation underlies the Lindavista Formation and overlies the Stadium Conglomerate (Kennedy 1975). The Mission Valley Formation has produced numerous well-preserved fossils, with four known fossil localities within 1 mile of the proposed project (McComas 2016). The fossil localities yielded a variety of marine invertebrates and terrestrial and marine vertebrates, including oysters, clams, baleen whales, rodents, insectivores, bats, marsupials, and dermopterans (flying lemurs) (McComas 2016). The Mission Valley Formation has a high paleontological resource sensitivity based on the City of San Diego (2011) guidelines for paleontology and the SDNHM (McComas 2016).

#### 3.2.3 Lindavista Formation

The early to middle Pleistocene Lindavista Formation is an interfingering shallow marine and nearshore terrestrial deposit (in its eastern extent) that is deposited on the Lindavista Terrace, which is a wide, nearly flat, wave-cut terrace that dips slightly to the west and extends almost 15

kilometers inland (Kennedy 1973). Sediments consist of reddish orange to yellowish orange, moderately indurated medium to coarse sandstones to gravel conglomerates (Kennedy 1973). Within the proposed project area, the formation is equivalent to unit 7, very old paralic deposits (map unit Qpov<sub>7</sub>), mapped by Kennedy and Tan (2008). While fossils are not that common in the Lindavista Formation and McComas (2016) reported no localities within 1 mile of the proposed project area, the formation has produced clams, scallops, barnacles, sand dollars, sharks, and baleen whales. The Lindavista Formation is considered to have moderate paleontological sensitivity based on the numbers of fossils recovered throughout its geographic extent (City of San Diego 2011; McComas 2016).

## 3.3 Regulatory Setting

This section describes the applicable regulatory plans, policies, and ordinances for the proposed project.

#### 3.3.1 Federal

#### 3.3.1.1 The National Historic Preservation Act

The National Historic Preservation Act (NHPA) established the National Register of Historic Places (NRHP) and the President's Advisory Council on Historic Preservation (ACHP), and provided that states may establish State Historic Preservation Officers to carry out some of the functions of the NHPA. Section 106 of the NHPA directs that "[t]he head of any Federal agency having direct or indirect jurisdiction over a proposed Federal or federally assisted undertaking in any State and the head of any Federal department or independent agency having authority to license any undertaking shall, prior to the approval of the expenditure of any Federal funds on the undertaking or prior to the issuance of any license, as the case may be, take into account the effect of the undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the NRHP." Section 106 also affords the ACHP a reasonable opportunity to comment on the undertaking (16 USC 470f).

36 Code of Federal Regulations, Part 800 (36 CFR 800) implements Section 106 of the NHPA. It defines the steps necessary to identify historic properties (those cultural resources listed in or eligible for listing in the NRHP), including consultation with federally recognized Native American tribes to identify resources with important cultural values, to determine whether or not they may be adversely affected by a proposed undertaking and the process for eliminating, reducing, or mitigating the adverse effects.

The content of 36 CFR 60.4 defines criteria for determining eligibility for listing in the NRHP. The significance of cultural resources identified during an inventory must be formally evaluated

## DUDEK

# Cultural Resources Technical Report for the SDSU New Student Housing Project

for historic significance in consultation with the ACHP and the California State Historic Preservation Officer to determine if the resources are eligible for inclusion in the NRHP. Cultural resources may be considered eligible for listing if they possess integrity of location, design, setting, materials, workmanship, feeling, and association.

Regarding criteria A through D of Section 106, the quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, cultural resources, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and that:

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

The 1992 amendments to the NHPA enhance the recognition of tribal governments' roles in the national historic preservation program, including adding a member of an Indian tribe or Native Hawaiian organization to the ACHP.

#### 3.3.1.2 The NHPA Amendments

The 1992 amendments to the NHPA:

- Clarify that properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization may be determined eligible for inclusion in the NRHP
- Reinforce the provisions of the ACHP's regulations that require the federal agency to consult on properties of religious and cultural importance.

The 1992 amendments also specify that the ACHP can enter into agreement with tribes that permit undertakings on tribal land and that are reviewed under tribal regulations governing Section 106. Regulations implementing the NHPA state that a federal agency must consult with any Indian tribe that attaches religious and cultural significance to historic properties that may be affected by an undertaking.

#### 3.3.1.3 Archaeological Resources Protection Act

The Archaeological Resources Protection Act of 1979 (ARPA) requires landholding federal agencies to notify federally recognized Indian tribes before a permit is issued for archaeological excavation on sites of religious or cultural importance to them in national parks, wildlife refuges, or forests, or on Indian lands. ARPA raised the penalty for looting objects older than 100 years to \$20,000 dollars for a first-time felony infraction. For a repeat infringement the fine was raised to \$100,000 and up to 5 years in prison.

Federally recognized tribes must be notified 30 days before issuing a permit for excavations on public land; upon request, the federal land manager must meet with them in those 30 days to discuss their concerns. On Indian lands, Indian Tribe or individual consent must be obtained before the permit is granted.

Uniform rules and regulations were published by the Departments of the Interior (43 CFR Section 7), Agriculture (36 CFR Section 296), and Defense (32 CFR Section 229), and the Tennessee Valley Authority (18 CFR Section 1313) in the January 6, 1984, Federal Register. Similar regulations were published for implementing ARPA on Indian lands (25 CFR Section 262) in the December 13, 1993, Federal Register.

The regulations also state that the federal agency also may notify any other Native American group known by the agency to consider the sites to be of cultural or religious importance. The intentional excavation of human remains, funerary objects, sacred objects, or objects of cultural patrimony from federal lands and tribal lands must follow both the requirements of ARPA and the Native American Graves Protection and Repatriation Act (NAGPRA). The BIA will issue any ARPA permits needed for excavation on private lands within the exterior boundaries of Indian reservations.

#### 3.3.1.4 The Native American Graves Protection and Repatriation Act

NAGPRA became effective November 16, 1990. NAGPRA addresses the rights of lineal descendants, Indian tribes, and Native Hawaiian organizations to human remains and certain cultural items with which they are affiliated. NAGPRA directs federal agencies and museums to identify, in consultation with Native Americans, the cultural affiliation of Native American human remains and associated funerary objects, unassociated funerary objects, sacred objects, or objects of cultural patrimony, in holdings or collections under their possession (i.e., physical custody) or control (i.e., having sufficient legal interest). Ultimately, the intent is to repatriate the human remains and other cultural items to the appropriate lineal descendants or tribe. NAGPRA authorizes provisions for federal grants supporting activities of repatriation, and outlines

penalties for non-compliance and illegal trafficking of funerary or sacred items. Such civil penalties are to be assessed by the Secretary of the Interior, and generally correspond with those defined in the ARPA.

#### 3.3.2 State

#### 3.3.2.1 California Environmental Quality Act

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

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

- 1. California Public Resources Code section 21083.2(g): Defines "unique archaeological resource."
- 2. California Public Resources Code Section 21084.1 and CEQA Guidelines Section 15064.5(a): Defines historical resources. In addition, CEQA Guidelines Section 15064.5(b) defines the phrase "substantial adverse change in the significance of an historical resource. It also defines the circumstances when a project would materially impair the significance of a historical resource.
- 3. California Public Resources Code Section 21074 (a): defines "tribal cultural resources" and Section 21074(b): defines a "cultural landscape."
- 4. California Public Resources Code section 5097.98 and CEQA Guidelines Section 15064.5(e): These statutes set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated ceremony.
- 5. California Public Resources Code Sections 21083.2(b)-(c) and CEQA Guidelines Section 15126.4: These statutes and regulations provide information regarding the mitigation framework for archaeological and historic resources, including options of preservationin-place mitigation measures; identifies preservation-in-place as the preferred manner of mitigating impacts to significant archaeological sites.

Under CEQA, a project may have a significant effect on the environment if it may cause "a substantial adverse change in the significance of an historical resource" (California Public Resources Code Section 21084.1; CEQA Guidelines Section 15064.5(b)). An "historical resource" is any site listed or eligible for listing in the CRHR. The CRHR listing criteria are intended to examine whether the resource in question: (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 pre-history or history.

The term "historical resource" also includes any site described in a local register of historic resources, or identified as significant in a historical resources survey (meeting the requirements of California Public Resources Code Section 5024.1(q)).

CEQA also applies to "unique archaeological resources." California Public Resources Code Section 21083.2(g) defines a "unique archaeological resource" as any archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

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

In 2014, CEQA was amended to apply to "tribal culture resources" as well. Specifically, California Public Resources Code Section 21074 provides guidance for defining tribal cultural resources as either of the following:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following: (a) Included or determined to be eligible for inclusion in the California Register of Historical Resources. (b) Included in a local register of historical resources as defined in subdivision (k) of [Section] 5020.1.
- (2) 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 [Section] 5024.1. In applying the criteria set forth in subdivision (c) of [Section] 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe. (b) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

All historical resources and unique archaeological resources – as defined by statute – are presumed to be historically or culturally significant for purposes of CEQA (California Public Resources Code Section 21084.1; CEQA Guidelines Section 15064.5(a)). The lead agency is not precluded from determining that a resource is a historical resource even if it does not fall within this presumption (California Public Resources Code Section 21084.1; CEQA Guidelines Section 15064.5(a)). A site or resource that does not meet the definition of "historical resource" or "unique archaeological resource" is not considered significant under CEQA and need not be analyzed further (California Public Resources Code Section 21083.2(a); CEQA Guidelines Section 15064.5(c)(4)).

Under CEQA, a significant cultural impact results from a "substantial adverse change in the significance of an historical resource [including a unique archaeological resource]" due to the "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired" (CEQA Guidelines Section 15064.5(b)(1); California Public Resources Code Section 5020.1(q)). In turn, the significance of a historical resource is materially impaired when a project:

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

DUDEK

(CEQA Guidelines Section 15064.5(b)(2)).

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

When a project significantly affects a unique archeological resource, CEQA imposes special mitigation requirements. Specifically:

If it can be demonstrated that a project will cause damage to a unique archeological resource, the lead agency may require reasonable efforts to be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. Examples of that treatment, in no order of preference, may include, but are not limited to, any of the following:

- 1. Planning construction to avoid archeological sites.
- 2. Deeding archeological sites into permanent conservation easements.
- 3. Capping or covering archeological sites with a layer of soil before building on the sites.
- 4. Planning parks, greenspace, or other open space to incorporate archeological sites.

(California Public Resources Code Section 21083.2(b)(1)-(4).)

If these "preservation in place" options are not feasible, mitigation may be accomplished through data recovery (California Public Resources Code Section 21083.2(d); CEQA Guidelines Section 15126.4(b)(3)(C)). California Public Resources Code Section 21083.2(d) states that "[e]xcavation as mitigation shall be restricted to those parts of the unique archeological resource that would be damaged or destroyed by the project. Excavation as mitigation shall not be required for a unique archeological resource if the lead agency determines that testing or studies already completed have adequately recovered the scientifically consequential information from and about the resource, if this determination is documented in the environmental impact report."

These same requirements are set forth in slightly greater detail in CEQA Guidelines Section 15126.4(b)(3), as follows:

(A) Preservation in place is the preferred manner of mitigating impacts to archeological sites. Preservation in place maintains the relationship between artifacts and the archeological context. Preservation may also avoid conflict with religious or cultural values of groups associated with the site.

- (B) Preservation in place may be accomplished by, but is not limited to, the following:
  - 1. Planning construction to avoid archeological sites;
  - 2. Incorporation of sites within parks, greenspace, or other open space;
  - 3. Covering the archeological sites with a layer of chemically stable soil before building tennis courts, parking lots, or similar facilities on the site[; and]
  - 4. Deeding the site into a permanent conservation easement.
- (C) When data recovery through excavation is the only feasible mitigation, a data recovery plan, which makes provision for adequately recovering the scientifically consequential information from and about the historical resource, shall be prepared and adopted prior to any excavation being undertaken.

Note that, when conducting data recovery, "[i]f an artifact must be removed during project excavation or testing, curation may be an appropriate mitigation" (CEQA Guidelines Section 15126.4(b)(3)). However, "[d]ata recovery shall not be required for an historical resource if the lead agency determines that testing or studies already completed have adequately recovered the scientifically consequential information from and about the archeological or historic resource, provided that determination is documented in the EIR and that the studies are deposited with the California Historical Resources Regional Information Center" (CEQA Guidelines section 15126.4(b)(3)(D)).

Finally, CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. If Native American human remains or related cultural material are encountered, Section 15064.5(e) of the CEQA Guidelines (as incorporated from California Public Resources Code Section 5097.98) and Health and Safety Code Section 7050.5 define the subsequent protocol. In the event of the accidental discovery or recognition of any human remains, excavation or other disturbances shall be suspended of the site or any nearby area reasonably suspected to overlie adjacent human remains or related material. Protocol requires that a county-approved coroner be contacted in order to determine if the remains are of Native American origin. Should the coroner determine the remains to be Native American, the coroner must contact the NAHC within 24 hours. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating, with appropriate dignity, the human remains and any associated grave goods as provided in California Public Resources Code Section 5097.98 (California Code of Regulations, Title 14; Chapter 3; Article 5; Section 15064.5(e)).

DUDEK

# Cultural Resources Technical Report for the SDSU New Student Housing Project

CEQA (California Public Resources Code Section 21000 et seq.) is the primary state environmental law protecting fossils. CEQA requires that public agencies and private interests identify the environmental consequences of their proposed projects on any object or site of significance to the scientific annals of California (Division I, California Public Resources Code, Section 5020.1 [b]). Administrative regulations for the implementation of CEQA are set forth in California Code of Regulations (CCR) Section 15000 et seq., commonly known as the "CEQA Guidelines." The CEQA Guidelines define procedures, types of activities, persons, and public agencies required to comply with CEQA. Appendix G of the CEQA Guidelines contains an Environmental Checklist of questions that a lead agency should normally address if relevant to a project's environmental impacts. CEQA Guidelines Section V(a) of the Environmental Checklist asks a question directly applicable paleontological resources: "Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?" Fossils are significant examples of the major periods of California prehistory. To be in compliance with CEQA, environmental impact assessments, statements, and reports must answer this question in the Environmental Checklist to determine the potential impact to paleontological resources with and without mitigation.

The CEQA lead agency having jurisdiction over a project is responsible for ensuring that paleontological resources are protected in compliance with CEQA and other applicable statutes. CEQA Section 21081.6 requires that the lead agency demonstrate project compliance with mitigation measures developed during the environmental impact review process.

### 3.3.3 Local

#### City of San Diego

Although SDSU, as a state agency (California State University) is not subject to local planning and zoning laws and, therefore, is not required to follow the City's historical resources evaluation protocol, SDSU has chosen to use this guidance due to its applicability to the San Diego built environment. The Historical Resources Guidelines of the City's Land Development Manual identifies the criteria under which a resource may be historically designated. It states that any improvement, building, structure, sign, interior element and fixture, site, place, district, area, or object may be designated a historical resource by the City Historical Resources Board if it meets one or more of the following designation criteria:

- a. Exemplifies or reflects special elements of the City's, a community's or a 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 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; or
- 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.

The designation and preservation of the City's historic resources is a primary goal of the Historic Preservation Element of the City's Draft General Plan. In 2007, the City prepared the San Diego Modernism Historic Context Statement for consideration of its modern resources (c. 1935–1970). The report details the background of social and economic history, development patterns, and artistic and cultural trends that define the modern era in San Diego. This context statement was utilized in the evaluation of the five modern-age resources evaluated as part of the current study, and in consideration of each building's historic significance at the local level.

The City of San Diego (2011) addresses potential significant impacts to paleontological resources, and categorizes paleontological sensitivities of geological units as having high, moderate, low, and zero potential for yielding significant paleontological resources.

## 3.4 Cultural Context

Evidence for continuous human occupation in the San Diego region spans the last 10,000 years. Various attempts to parse out variability in archaeological assemblages over this broad time frame have led to the development of several cultural chronologies; some of these are based on geologic time, most are based on temporal trends in archaeological assemblages, and others are interpretive reconstructions. Each of these reconstructions describes essentially similar trends in assemblage composition in more or less detail. This research employs a common set of generalized terms used to describe chronological trends in assemblage composition: Paleoindian (pre-5500 BC), Archaic (8000 BC–AD 500), Late Prehistoric (AD 500–1750), and Ethnohistoric (post-AD 1750).

#### 3.4.1 Paleoindian (pre-5500 BC)

Evidence for Paleoindian occupation in coastal Southern California is tenuous, especially considering the fact that the oldest dated archaeological assemblages look nothing like the Paleoindian artifacts from the Great Basin. One of the earliest dated archaeological assemblages in coastal Southern California (excluding the Channel Islands) derives from SDI-4669/W-12, in La Jolla. A human burial from SDI-4669 was radiocarbon dated to 9,590-9,920 years before present (95.4% probability) (Hector 1984). The burial is part of a larger site complex that contained more than 29 human burials associated with an assemblage that fits the Archaic profile (i.e., large amounts of groundstone, battered cobbles, and expedient flake tools). In contrast, typical Paleoindian assemblages include large-stemmed projectile points, high proportions of formal lithic tools, bifacial lithic reduction strategies, and relatively small proportions of groundstone tools. Prime examples of this pattern are sites that were studied by Davis (1978) on China Lake Naval Air Weapons Station near Ridgecrest, California. These sites contained fluted and unfluted stemmed points and large numbers of formal flake tools (e.g., shaped scrapers, blades). Other typical Paleoindian sites include the Komodo site (MNO-679)-a multicomponent fluted point site, and MNO-680-a single component Great Basined Stemmed point site (Basgall et al. 2002). At MNO-679 and MNO-680, groundstone tools were rare while finely made projectile points were common.

Turning back to coastal Southern California, the fact that some of the earliest dated assemblages are dominated by processing tools runs counter to traditional notions of mobile hunter–gatherers traversing the landscape for highly valued prey. Evidence for the latter—that is, typical Paleoindian assemblages—may have been located along the coastal margin at one time, prior to glacial desiccation and a rapid rise in sea level during the early Holocene (pre-7500 BP) that submerged as much as 1.8 kilometer of the San Diego coastline. If this were true, however, it would also be expected that such sites would be located on older landforms near the current coastline. Some sites, such as SDI-210 along Agua Hedionda Lagoon, contained stemmed points similar in form to Silver Lake and Lake Mojave projectile points (pre-8000 BP) that are commonly found at sites in California's high desert (Basgall and Hall 1990). SDI-210 yielded one corrected radiocarbon date of 8520–9520 BP (Warren et al. 2004). However, sites of this nature are extremely rare and cannot be separated from large numbers of milling tools that intermingle with old projectile point forms.

Warren et al. (2004) claimed that a biface manufacturing tradition present at the Harris site complex (SDI-149) is representative of typical Paleoindian occupation in the San Diego region that possibly dates between 10,365 and 8200 BC (Warren et al. 2004, p. 26). Termed San Dieguito (Rogers 1945), assemblages at the Harris site are qualitatively distinct from most others in the San Diego region because the site has large numbers of finely made bifaces (including

projectile points), formal flake tools, a biface reduction trajectory, and relatively small amounts of processing tools (Warren 1964, 1968). Despite the unique assemblage composition, the definition of San Dieguito as a separate cultural tradition is hotly debated. Gallegos (1987) suggested that the San Dieguito pattern is simply an inland manifestation of a broader economic pattern. Gallegos' interpretation of San Dieguito has been widely accepted in recent years, in part because of the difficulty in distinguishing San Dieguito components from other assemblage constituents. In other words, it is easier to ignore San Dieguito as a distinct socioeconomic pattern than it is to draw it out of mixed assemblages.

The large number of finished bifaces (i.e., projectile points and non-projectile blades), along with large numbers of formal flake tools at the Harris site complex, is very different than nearly all other assemblages throughout the San Diego region, regardless of age. Warren et al. (2004) made this point, tabulating basic assemblage constituents for key early Holocene sites. Producing finely made bifaces and formal flake tools implies that relatively large amounts of time were spent for tool manufacture. Such a strategy contrasts with the expedient flake-based tools and cobble-core reduction strategy that typifies non-San Dieguito Archaic sites. It can be inferred from the uniquely high degree of San Dieguito assemblage formality that the Harris site complex represents a distinct economic strategy from non-San Dieguito assemblages.

If San Dieguito truly represents a distinct socioeconomic strategy from the non-San Dieguito Archaic processing regime, its rarity implies that it was not only short-lived, but that it was not as economically successful as the Archaic strategy. Such a conclusion would fit with other trends in Southern California deserts, wherein hunting-related tools are replaced by processing tools during the early Holocene (Basgall and Hall 1990).

### 3.4.2 Archaic (8000 BC–AD 500)

The more than 1,500-year overlap between the presumed age of Paleoindian occupations and the Archaic period highlights the difficulty in defining a cultural chronology in the San Diego region. If San Dieguito is the only recognized Paleoindian component in the San Diego region, then the dominance of hunting tools implies that it derives from Great Basin adaptive strategies and is not necessarily a local adaptation. Warren et al. (2004) admitted as much, citing strong desert connections with San Dieguito. Thus, the Archaic pattern is the earliest local socioeconomic adaptation in the San Diego region (Hale 2001, 2009).

The Archaic pattern is relatively easy to define with assemblages that consist primarily of processing tools: millingstones, handstones, battered cobbles, heavy crude scrapers, incipient flake-based tools, and cobble-core reduction. These assemblages occur in all environments across the San Diego region, with little variability in tool composition. Low assemblage

variability over time and space among Archaic sites has been equated with cultural conservatism (Byrd and Reddy 2002; Warren 1968; Warren et al. 2004). Despite enormous amounts of archaeological work at Archaic sites, little change in assemblage composition occurs until the bow and arrow is adopted at around AD 500, as well as ceramics at approximately the same time (Griset 1996; Hale 2009). Even then, assemblage formality remains low. After the bow is adopted, small arrow points appear in large quantities and already low amounts of formal flake tools are replaced by increasing amounts of expedient flake tools. Similarly, shaped millingstones and handstones decrease in proportion relative to expedient, unshaped groundstone tools (Hale 2009). Thus, the terminus of the Archaic period is equally as hard to define as its beginning because basic assemblage constituents and patterns of manufacturing investment remain stable, complimented only by the addition of the bow and ceramics.

#### 3.4.3 Late Prehistoric (AD 500–1750)

The period of time following the Archaic and prior to Ethnohistoric times (AD 1750) is commonly referred to as the Late Prehistoric (Rogers 1945; Wallace 1955; Warren et al. 2004). However, several other subdivisions continue to be used to describe various shifts in assemblage composition, including the addition of ceramics and cremation practices. In northern San Diego County, the post-AD 1450 period is called the San Luis Rey Complex (True 1980), while the same period in southern San Diego County is called the Cuyamaca Complex and is thought to extend from AD 500 until Ethnohistoric times (Meighan 1959). Rogers (1929) also subdivided the last 1,000 years into the Yuman II and III cultures, based on the distribution of ceramics, and the widespread use of bedrock mortars. Vagaries in the appearance of the bow and arrow and ceramics make the temporal resolution of the San Luis Rey and Cuyamaca complexes difficult. For this reason, the term Late Prehistoric is well suited to describe the last 1,500 years of prehistory in the San Diego region.

Temporal trends in socioeconomic adaptations during the Late Prehistoric period are poorly understood. This is partly due to the fact that the fundamental Late Prehistoric assemblage is very similar to the Archaic pattern, but includes arrow points and large quantities of fine debitage from producing arrow points, ceramics, and cremations. The appearance of mortars and pestles is difficult to place in time because most mortars are on bedrock surfaces; bowl mortars are actually rare in the San Diego region. Some argue that the Ethnohistoric intensive acorn economy extends as far back as AD 500 (Bean and Shipek 1978). However, there is no substantial evidence that reliance on acorns, and the accompanying use of mortars and pestles, occurred prior to AD 1400. True (1980) argued that acorn processing and ceramic use in the northern San Diego region did not occur until the San Luis Rey pattern emerged after approximately AD 1450. For southern San Diego County, the picture is less clear. The

DUDEK

Cuyamaca Complex is the southern counterpart to the San Luis Rey pattern, however, and is most recognizable after AD 1450 (Hector 1984). Similar to True (1980), Hale (2009) argued that an acorn economy did not appear in the southern San Diego region until just prior to Ethnohistoric times, and that when it did occur, a major shift in social organization followed.

#### 3.4.4 Ethnohistoric (post-AD 1750)

The history of the Native American communities prior to the mid-1700s has largely been reconstructed through later mission-period and early ethnographic accounts. The first records of the Native American inhabitants of the San Diego region come predominantly from European merchants, missionaries, military personnel, and explorers. These brief, and generally peripheral, accounts were prepared with the intent of furthering respective colonial and economic aims and were combined with observations of the landscape. They were not intended to be unbiased accounts regarding the cultural structures and community practices of the newly encountered cultural groups. The establishment of the missions in the San Diego region brought more extensive documentation of Native American communities, though these groups did not become the focus of formal and in-depth ethnographic study until the early twentieth century (Boscana 1846, Fages 1937, Geiger and Meighan 1976, Harrington 1934, Laylander 2000). The principal intent of these researchers was to record the precontact, culturally specific practices, ideologies, and languages that had survived the destabilizing effects of missionization and colonialism. This research, often understood as "salvage ethnography," was driven by the understanding that traditional knowledge was being lost due to the impacts of modernization and cultural assimilation. Alfred Kroeber applied his "memory culture" approach (Lightfoot 2005, p. 32) by recording languages and oral histories within the San Diego region. Kroeber's 1925 assessment of the impacts of Spanish missionization on local Native American populations supported Kumeyaay traditional cultural continuity (Kroeber 1925, p. 711):

San Diego was the first mission founded in upper California; but the geographical limits of its influence were the narrowest of any, and its effects on the natives comparatively light. There seem to be two reasons for this: first, the stubbornly resisting temper of the natives; and second, a failure of the rigorous concentration policy enforced elsewhere.

In some ways this interpretation led to the belief that many California Native American groups simply escaped the harmful effects of contact and colonization all together. This, of course, is untrue. Ethnographic research by Dubois, Kroeber, Harrington, Spier, and others during the early twentieth century seemed to indicate that traditional cultural practices and beliefs survived among local Native American communities. These accounts supported, and were supported by, previous governmental decisions, which made San Diego County the location of more federally recognized tribes than anywhere else in the United States: 18 tribes on 18 reservations that cover more than 116,000 acres (CSP 2009).

The traditional cultural boundaries between the Luiseño and Kumeyaay Native American tribal groups have been well defined by anthropologist Florence C. Shipek:

In 1769, the Kumeyaay national territory started at the coast about 100 miles south of the Mexican border (below Santo Tomas), thence north to the coast at the drainage divide south of the San Luis Rey River including its tributaries. Using the U.S. Geological Survey topographic maps, the boundary with the Luiseño then follows that divide inland. The boundary continues on the divide separating Valley Center from Escondido and then up along Bear Ridge to the 2240 contour line and then north across the divide between Valley Center and Woods Valley up to the 1880-foot peak, then curving around east along the divide above Woods Valley. [1993, as summarized by the San Diego County Board of Supervisors 2007:6]

Based on ethnographic information, it is believed that at least 88 different languages were spoken from Baja California Sur to the southern Oregon state border at the time of Spanish contact (Johnson and Lorenz 2006, p. 34). The distribution of recorded Native American languages has been dispersed as a geographic mosaic across California through six primary language families (Golla 2007, p. 71). Ipai and Tipai, spoken respectively by the northern and southern Kumeyaay communities, are mutually intelligible. For this reason, these two are often treated as dialects of a larger Kumeyaay tribal group rather than as distinctive languages, though this has been debated (Luomala 1978; Laylander 2010).

Victor Golla has contended that one can interpret the amount of variability within specific language groups as being associated with the relative "time depth" of the speaking populations (Golla 2007, p. 80) A large amount of variation within the language of a group represents a greater time depth then a group's language with less internal diversity. One method that he has employed is by drawing comparisons with historically documented changes in Germanic and Romantic language groups. Golla has observed that the "absolute chronology of the internal diversification within a language family" can be correlated with archaeological dates (2007, p. 71). This type of interpretation is modeled on concepts of genetic drift and gene flows that are associated with migration and population isolation in the biological sciences.

Golla suggested that there are two language families associated with Native American groups who traditionally lived throughout the San Diego County region. The northern San Diego tribes have traditionally spoken Takic languages that may be assigned to the larger Uto–Aztecan family (Golla 2007, p. 74). These groups include the Luiseño, Cupeño, and Cahuilla. Golla has

# Cultural Resources Technical Report for the SDSU New Student Housing Project

interpreted the amount of internal diversity within these language-speaking communities to reflect a time depth of approximately 2,000 years. Other researchers have contended that Takic may have diverged from Uto-Aztecan ca. 2600 BC-AD 1, which was later followed by the diversification within the Takic speaking San Diego tribes, occurring approximately 1500 BC-AD 1000 (Laylander 2010). The majority of Native American tribal groups in southern San Diego region have traditionally spoken Yuman languages, a subgroup of the Hokan Phylum. Golla has suggested that the time depth of Hokan is approximately 8,000 years (Golla 2007, p. 74). The Kumeyaay tribal communities share a common language group with the Cocopa, Quechan, Maricopa, Mojave, and others to east, and the Kiliwa to the south. The time depth for both the Ipai (north of the San Diego River, from Escondido to Lake Henshaw) and the Tipai (south of the San Diego River, the Laguna Mountains through Ensenada) is approximated to be 2,000 years at the most. Laylander contended that previous research indicates a divergence between Ipai and Tipai to have occurred approximately AD 600-1200 (Laylander 1985). Despite the distinct linguistic differences between the Takic-speaking tribes to the north, the Ipaispeaking communities in central San Diego, and the Tipai southern Kumeyaay, attempts to illustrate the distinctions between these groups based solely on cultural material alone have had only limited success (Pigniolo 2004, True 1966).

The Kumeyaay generally lived in smaller family subgroups that would inhabit two or more locations over the course of the year. While less common, there is sufficient evidence that there were also permanently occupied villages, and that some members may have remained at these locations throughout the year (Owen 1965; Shipek 1982, 1985; Spier 1923). Each autonomous triblet was internally socially stratified, commonly including higher status individuals such as a tribal head (Kwaaypay), shaman (Kuseyaay), and general members with various responsibilities and skills (Shipek 1982). Higher-status individuals tended to have greater rights to land resources, and owned more goods, such as shell money and beads, decorative items, and clothing. To some degree, titles were passed along family lines; however, tangible goods were generally ceremonially burned or destroyed following the deaths of their owners (Luomala 1978). Remains were cremated over a pyre and then relocated to a cremation ceramic vessel that was placed in a removed or hidden location. A broken metate was commonly placed at the location of the cremated remains, with the intent of providing aid and further use after death. At maturity, tribal members often left to other bands in order to find a partner. The families formed networks of communication and exchange around such partnerships.

Areas or regions, identified by known physical landmarks, could be recognized as band-specific territories that may be violently defended against use by other members of the Kumeyaay. Other areas or resources, such as water sources and other locations that were rich in natural resources, were generally understood as communal land to be shared amongst all the Kumeyaay (Loumala
1978). The coastal Kumeyaay exchanged a number of local goods, such as seafood, coastal plants, and various types of shell for items including acorns, agave, mesquite beans, gourds, and other more interior plants of use (Luomala 1978). Shellfish would have been procured from three primary environments, including the sandy open coast, bay and lagoon, and rocky open coast. The availability of these marine resources changed with the rising sea levels, siltation of lagoon and bay environments, changing climatic conditions, and intensity of use by humans and animals (Gallegos and Kyle 1988; Pigniolo 2005; Warren and Pavesic 1963). Shellfish from sandy environments included Donax, Saxidomas, Tivela, and others. Rocky coast shellfish dietary contributions consisted of Pseudochama, Megastraea, Saxidomus, Protothaca, Megathura, and others. Lastly, the bay environment in the immediate vicinity of the project area would have provided Argopecten, Chione, Ostrea, Neverita, Macoma, Tagelus, and others. While marine resources were obviously consumed, terrestrial animals and other resources likely provided a large portion of sustenance. Game animals consisted of rabbits, hares (*Leporidae*), birds, ground squirrels, woodrats (Neotoma), deer, bears, mountain lions (Puma concolor), bobcats (Lynx rufus), coyotes (Canus latrans), and others. In lesser numbers, reptiles and amphibians may have been consumed.

A number of local plants were used for food and medicine. These were exploited seasonally, and were both traded between regional groups and gathered as a single triblet moved between habitation areas. Some of the more common of these that may have been procured locally or as higher elevation varieties would have included buckwheat (*Eriogonum fasciculatum*), *Agave*, *Yucca*, lemonade berry (*Rhus integrifolia*), sugar brush (*Rhus ovata*), sage scrub (*Artemisia californica*), yerba santa (*Eriodictyon*), sage (*Salvia*), *Ephedra*, prickly pear (*Opuntia*), mulefat (*Baccharis salicifolia*), chamise (*Adenostoma fasciculatum*), elderberry (*Sambucus nigra*), oak (*Quercus*), willow (Salix), and *Juncus* grass among many others (Wilken 2012).

## 3.4.5 The Historic Period (post-AD 1542)

European activity in the region began as early as AD 1542, when Juan Rodríguez Cabrillo landed in San Diego Bay. Sebastián Vizcaíno returned in 1602, and it is possible that there were subsequent contacts that went unrecorded. These brief encounters made the local native people aware of the existence of other cultures that were technologically more complex than their own. Epidemic diseases may also have been introduced into the region at an early date, either by direct contacts with the infrequent European visitors or through waves of diffusion emanating from native peoples farther to the east or south (Preston 2002). It is possible, but as yet unproven, that the precipitous demographic decline of native peoples had already begun prior to the arrival of Gaspar de Portolá and Junípero Serra in 1769. Spanish colonial settlement was initiated in 1769, when multiple expeditions arrived in San Diego by land and sea, and then continued northward through the coastal plain toward Monterey. A military presidio and a mission to deal with the local Kumeyaay were soon firmly established at San Diego, despite violent resistance to them from a coalition of native communities in 1776. Private ranchos subsequently established by Spanish and Mexican soldiers, as well as other non-natives, appropriated much of the remaining coastal or near-coastal locations (Pourade 1960–1967).

Mexico's separation from the Spanish empire in 1821 and the secularization of the California missions in the 1830s caused further disruptions to native populations in western San Diego County. Some former mission neophytes were absorbed into the work forces on the ranchos, while others drifted toward the urban centers at San Diego and Los Angeles or moved to the eastern portions of the county where they were able to join still largely autonomous native communities. United States conquest and annexation, together with the gold rush in Northern California, brought many additional outsiders into the region. Development during the following decades was fitful, undergoing cycles of boom and bust. With rising populations in the nineteenth century throughout the Southern California region, there were increased demands for important commodities such as salt.

## 3.5 Archaeological Inventory

#### 3.5.1 Previously Recorded Resources

Dudek GIS staff conducted a records search of files obtained from SCIC for the project area and a surrounding 1-mile buffer on December 29, 2016. The records search identified three previous cultural resources studies that include portions of the current APE. The most pertinent of these studies was conducted by Larry Pierson of Brian F. Smith and Associates in 2007 (**Confidential Appendix A**). This previously conducted pedestrian survey included the current project area and identified no cultural resources. An additional 81 studies have been conducted within a mile of the current APE (**Table 3.1**). The records search identified no previously recorded cultural resources within the APE; however, 47 resources have been identified within 1 mile of the APE (**Table 3.2**). Sites P-37-009899 and P-37-013708 are the nearest recorded sites, located 250 feet and 530 feet east of the project area, respectively. These resources consist of a portable milling stone and the Aztec Bowl football stadium.

## Cultural Resources Technical Report for the SDSU New Student Housing Project

Table 3.1
Previously Conducted Studies Within 1 Mile of APE

Report No.	Year	Author	Title	
SD-00041	1985	Caltrans	Negative Archaeological Survey Report: Proposed Westbound Auxiliary Lane on Route 8., P.M. 6.3-8.1, 11222-169660	
SD-00469	1977	Caltrans	An Archaeological Survey Report for Portions of a Proposed Ramp Metering Project (11-SD-8, P.M. R 0.0- R 18.7) 11355-146531	
SD-00555	1977	Sue Ann Cupples	An Archaeological Survey Report for a Proposed Construction Project on 11-SD-8 p.m. 4.9/8.3 11206-152351	
SD-00803	1987	Caltrans	Negative Archaeological Survey Report: Proposed Additional Project Limits for Westbound Auxiliary Lane on Interstate 8, 11-SD-8 P.M. 5.8/9.7 11222-169660	
SD-01321	1979	WESTEC Services Inc.	Archaeological Survey of Fairmont P R D Project	
SD-01457	1981	Scientific Resource Surveys Inc.	Archaeological Survey Report on the Ronald Hogan Property Located in the Kensington Area of the City of San Diego	
SD-01706	1980	Caltrans	Phase I Archaeological Survey Report for Lane Additions and Sound Barrier on Interstate 8 11-SD-8 P.M. 8.5-10.4 11203-189821	
SD-02538	1992	Roth and Associates	Cultural resources survey College Area Redevelopment Project Environmental Impact Report (EIR) 131.4 acres	
SD-02869	1993	Ogden Environmental and Energy Services Co. Inc.	Historic properties inventory for the proposed Deerfield water pump plant discharge pipeline corridor, San Diego, California	
SD-02894	1993	City of San Diego Planning Department	Mitigated negative declaration replacement of water and sewer pipes: La Jolla, Uptown, Mission Valley, Midway and Navajo communities	
SD-02902	1995	Gallegos & Associates	Cultural resource survey report for the Adobe Falls Sewer Alignment Project	
SD-02996	1995	Gallegos & Associates	Historical/archaeological survey and test report for the El Capitan Water Pipeline Repair and Fairmount Avenue Widening, City of San Diego, California	
SD-04450	1980	Price, Harry	11-sd-08 p.m.8.5/10.4 11203-189821 auxiliary lanes & sound barriers	
SD-04923	1999	City SD Land Development Review Division	Draft EIR for Palo Verde Terrace Remediation Project	
SD-04938	1996	Gallegos and Associates	Cultural resources survey for a portion of the Adobe Falls Project	
SD-05675	1987	Richalene Kelsay	Negative area survey report district II County of San Diego	
SD-06143	1997	ASM Affiliates	Cultural resource survey of the proposed Fairmount Manor Project	
SD-06221	2000	Mckenna Etal	A Phase 1 cultural resources investigation of the Vesta Telecommunications Inc. Fiber Optic Alignment, River County to San Diego County California	
SD-06262	1997	City of San Diego	Mitigated negative declaration for Alvarado Trunk Sewer Realignment	
SD-06314	1997	John R. Cook S.O.P.A.; ASM Affiliates	Cultural resource survey of the proposed Fairmount Manor Project- Canyon Fill Only; City of San Diego LDR NO. 92-0302	
SD-06424	1997	RBF Associates	Draft: San Diego County Water Authority San Diego 18 Flow Control Facility and Connecting Pipeline Project	
SD-06499	1974	SDSU	A report of Cultural Impact Survey Phase I	
SD-06526	1985	Mary Donovan	Negative Archaeological Survey Report 8-Fairmount AveWestbound Auxiliary Lane	

## Cultural Resources Technical Report for the SDSU New Student Housing Project

Table 3.1
Previously Conducted Studies Within 1 Mile of APE

Report No.	Year	Author	Title	
SD-06744	1995	Cherilyn Widell	Office of historic preservation Aztec Bowl	
SD-07015	1999	City of San Diego	Public Notice of Proposed Negative Declaration Student Housing	
SD-07206	1999	City of San Diego	Public Notice of Proposed Draft Mitigated Negative Declaration El Capitan Pipeline-Trestle 12	
SD-07504	2002	LSA Associates Inc.	Cultural Resource Assessment Cingular Wireless Facility No. Sd702- 02 San Diego County, California	
SD-07771	2001	Brian F. Smith and Associates	An archaeological report for the mitigation, monitoring, and reporting program at sewer and water group 658	
SD-07780	2002	Brian F. Smith and Associates	An Archaeological Survey of the Alvarado Trunk Sewer Project, Alvarado Canyon, San Diego, California	
SD-07795	1995	Gallegos & Assoc.	Historical/Archaeological Survey Test Report for the El Capitan Water Pipeline Repair and Fairmount Avenue Widening City of San Diego, California	
SD-07796	1996	Brian Mooney Assoc.	Historical & Architectural Study of the El Capitan (Lakeside) to University Heights Water Pipeline (San Diego) Trestles 11 & 12 Ldr No. 94-0076	
SD-07868	1996	Brian F. Mooney Assoc.	Historical And Architectural Study of the El Capitan (Lakeside) to University Heights Water Pipeline (San Diego) Trestles 11 And 12	
SD-07892	2001	Caltrans	Historic Property Survey Report 115-Sr67	
SD-08420	2003	Brian F. Smith & Associates	Results of Archaeological Monitoring at the North Chollas Community Park Phase IP; K01069CA; CIP No. 29-6670, Specification No. 8295A, Work Order No. 296670; LDR No. 98-0150	
SD-09038	2002	Kyle Consulting	Cultural Resources Assessment for Cingular Wireless Facility Sd835- 01, City of San Diego, San Diego County, California	
SD-09069	2002	Kyle Consulting	Cultural Resource Assessment for Cingular Wireless Facility Sd701- 02 City of San Diego, California	
SD-09070	2002	Kyle Consulting	Cultural Resource Assessment for Cingular Wireless Facility Sd703- 01 City of San Diego, California	
SD-09228	2004	Brian F. Smith & Associates	An Archaeological/Historical Study for the Paseo at San Diego State University Project	
SD-09432	2004	City of San Diego	The Paseo at San Diego State University, EIR, Volume 1	
SD-09444	2004	ASM Affiliates Inc.	Cultural and Historical Resource Study for the Grantville Redevelopment Study and Project Area, San Diego, California	
SD-09697	2004	Brian F. Smith and Associates	An Archaeological/Historical Study for the SDSU 2005 Campus Master Plan Revision	
SD-10231	2006	Michael Brandman Associates	Cultural Resource Records Search and Site Visit Results for Cricket Telecommunications Facility Candidate San-519 (Foster Freeze Shopping Center), 5150 Waring Road, San Diego County, California	
SD-10525	1973	Patricia E. Teaze	Adobe Falls	
SD-10536	1993	Ogden Environmental and Energy Services Co. Inc.	Report to the Historical Board for the City of San Diego Water Utilities Department Alvarado Filtration Plant Upgrade and Expansion CIP 73-261	
SD-10545	2007	ASM Affiliates	Talmadge Community	

# Cultural Resources Technical Report for the SDSU New Student Housing Project

# Table 3.1Previously Conducted Studies Within 1 Mile of APE

Report No.	Year	Author	Title	
SD-11129	2002	City of San Diego - Development Services	Cultural Resources Survey for the 60th Street Pipe Replacement/Relocation Project (CIP 46-611.0, Fund 41506, Dept. 773, O.A. 9544, J.O. 178401)	
SD-11185	2007	Brian F. Smith and Associates	A Cultural Resources Study for the SDSU 2007 Campus Master Plan Revision	
SD-11265	N/A	N/A	San Diego State University, 5300 Campanile Drive, San Diego, California 92182	
SD-11826	2008	Affinis	Archaeological Resources Analysis for the Master Stormwater System Maintenance Program, San Diego, California Project. No. 42891	
SD-12076	2007	Legacy 106 Inc.	Historical Nomination of the Baron X. Kouch/Norma Meyer Schuh Spec House #2, 4643 El Cerrito Drive - El Cerrito, San Diego, California	
SD-12200	2009	City Of San Diego Development Services Department	Draft EIR for the Master Storm Water System Maintenance Program	
SD-12274	2000	Affinis	Archaeological Resources Survey, Alvarado Estates, San Diego, California	
SD-12296	2009	Scott A. Moomjian, Esq.	Historical Assessment of the 5585, 5595, 5605, 5619, & 5633 Lindo Paseo Buildings San Diego, California 92115	
SD-12325	2009	Scott A. Moomjian, Esq.	Historical Assessment of the 6229, 6237, & 6245 Montezuma Road Buildings San Diego, California 92115	
SD-12510	2009	Affinis	Individual Historic Assessment Report for the Alvarado Channel	
SD-13006	2011	Affinis	Master Storm Water System Maintenance Program	
SD-13121	2011	City Of San Diego	Montezuma Trunk Sewer	
SD-13143	2010	Brian F. Smith and Associates, Inc.	Archaeological Resource Monitoring Form: Mitigation Monitoring of Sewer Group 766 Project	
SD-13145	2010		Archaeological Resource Report Form: Mitigation Monitoring of Sewer & Water Group 684a Project	
SD-13162	2010	Cultural Land Planning and Research	The 1939 Life House 6025 Waverly House La Jolla, California	
SD-13163	2010	Is Architecture	Historical Resources Board Nomination for the William F. Wahrenberger/J.A. and Amry B. Smith Residence	
SD-13166	2011	Kathleen A. Crawford	7124 Olivetas Avenue, La Jolla, California 92037	
SD-13333	2008	Recon Environmental	Results of Historical Resources Survey of the Alvarado Apartments Project, San Diego, California	
SD-13470	2011	IS Architecture	Historical Resources Board Nomination for Eason/Cliff May Residence 4777 Avion Way San Diego, California 92115	
SD-13823	1997	Heritage Resources	NRHP Nomination San Diego State College Historic District San Diego, California	
SD-14013	2011	Trileaf	Verizon- El Cajon And College CA- Trileaf Project #351800	
SD-14085	2009	ASM Affiliates, Inc.	Historic Resource Inventory and Evaluation for the San Diego State University Plaza Linda Verde Project, San Diego, California	

## Cultural Resources Technical Report for the SDSU New Student Housing Project

Table 3.1
Previously Conducted Studies Within 1 Mile of APE

Report No.	Year	Author	Title		
SD-14238	2013	Michael Brandman Associates	Cultural Resource Records Search and Site Visit Results for Sprint Nextel Candidate Sd34xc524 (SDSU Foundation), 5250 Campanile Drive, San Diego, San Diego County, California		
SD-14427	2012	Ace Environmental Inc.	Cultural Resource Records Search and Site Survey AT&T Site Sd0775 Montezuma (Cox Arena) 5505 Montezuma Road San Diego, San Diego County, California 92115		
SD-14661	2013	City of San Diego	Campus Center Apartments		
SD-14740	2014	City of San Diego	Sewer Group Job 743		
SD-14808	2014	Brian F. Smith and Associates Inc.	Cultural Resource Monitoring Report for the Montezuma Trunk Sewer Project City of San Diego		
SD-15058	2009	Laguna Mountain Environmental	Cultural Resource Monitoring Report for the Block 3ff Talmadge Utility Undergrounding Project, City of San Diego, California		
SD-15077	2014	Environmental Assessment Specialists Inc.	Cultural Resources Records Search Results for T-Mobile West LLC Candidate Sd06026a (Sd026 SDSU Physical Plant) 5300 Campanile Drive, San Diego, San Diego County, California		
SD-15078	2014	Environmental Assessment Specialists Inc.	Direct Ape Historic Architectural Assessment for T-Mobile West LLC Candidate Sd06026a (Sd026 SDSU Physical Plant) 5300 Campanile Drive, San Diego, San Diego County, California		
SD-15093	2014	Environmental Assessment Specialists Inc.	Cultural Resources Records Search and Site Visit Results for T- Mobile West LLC Candidate Sd06417a (Sd417 SDSU Recital Hall) 5500 Campanile Drive, San Diego, San Diego County, California		
SD-15109	2014	Environmental Assessment Specialists Inc.	Direct Ape Historic Architectural Assessment for T-Mobile West LLC Candidate Sd06417a (Sd417 SDSU Recital Hall) 5500 Campanile Drive, San Diego, San Diego County, California		
SD-15151	2015	BCR Consulting LLC	Cultural Resources Assessment of the Crown Castle/Verizon Fiber Puc Project, San Diego, California (BCR Consulting Project No. Syn1404)		
SD-15304	2015	Brian F. Smith and Associates, Inc.	Cultural Resource Monitoring Report for the Sewer Group 549 Project (Part of Group 3016) City of San Diego		
SD-15536	2015	N/A	Cultural Network Analysis of Spanish Colonial Settlement Patterns in San Diego, California		
SD-15910	2014	City of San Diego Planning Department	Draft Programmatic Environmental Impact Report for the Grantville Focused Plan Amendment		
SD-15911	2014	ASM Affiliates	Historic Resources Reconnaissance Survey for Grantville Focused Plan Amendment, Grantville, San Diego, San Diego County, California		
SD-15912	2013	ASM Affiliates	Cultural Resources Technical Report for the Grantville Focus Plan Amendment, San Diego, California		
SD-15928	2014	N/A	Nomination for Historic Designation Martin and Enid Gleich/Henry Hester & Ronald K. David House		

# Cultural Resources Technical Report for the SDSU New Student Housing Project

## Table 3.2Previously Identified Resources Within 1 Mile of APE

ID Code	Trinomial	Era	Description
P-37-009899	CA-SDI-9899	Prehistoric	Isolated portable metate and shell scatter
P-37-013708	CA-SDI-13717	Historic	Aztec Bowl football stadium
P-37-015591		Prehistoric	Isolated quartzite core
P-37-015654		Prehistoric	Isolated quartzite flake tool
P-37-019016	CA-SDI-13708	Prehistoric	Bedrock milling feature and lithic artifact scatter
P-37-024341		Historic	Kensington-Talmadge Park
P-37-025491		Historic	Apartment complex
P-37-025492		Historic	Residence
P-37-028223	CA-SDI-18326	Prehistoric	Bedrock milling feature and artifact scatter
P-37-028224	CA-SDI-18327	Prehistoric	Bedrock milling feature
P-37-029023	CA-SDI-18589	Historic	Can and glass fragment scatter
P-37-032674	CA-SDI-20702	Historic	Refuse scatter
P-37-035445		Historic	SDSU Physical Plant
P-37-035449		Historic	SDSU Smith Recital Hall
P-37-035594		Historic	Residence
P-37-035655		Historic	Residence
4449 Yerba Santa Dr.		Historic	Residence
4643 El Cerrito Drive		Historic	Residence
4777 Avion Way		Historic	Residence
5111 College Avenue		Historic	Residence
5119 College Avenue		Historic	Residence
5141 College Avenue		Historic	Residence
5155 College Avenue		Historic	Residence
5157 College Avenue		Historic	Residence
5300 Campanile Drive		Historic	Residence
5500 Campanile Drive		Historic	Residence
5505 Montezuma Road		Historic	Residence
5585 Lindo Paseo		Historic	Residence
5595 Lindo Paseo		Historic	Residence
5605 Lindo Paseo		Historic	Residence
5619 Lindo Paseo		Historic	Residence
5633 Lindo Paseo		Historic	Residence
5716 Hardy Avenue		Historic	Residence
5721 Lindo Paseo		Historic	Residence
5723 Lindo Paseo		Historic	Residence
5734 Montezuma Road		Historic	Residence
5742 Montezuma Road		Historic	Residence
5822 Lindo Paseo		Historic	Residence
5830 Lindo Paseo		Historic	Residence

# Cultural Resources Technical Report for the SDSU New Student Housing Project

ID Code	Trinomial	Era	Description
5840 Hardy Avenue		Historic	Residence
5841 Hardy Avenue		Historic	Residence
5843 Hardy Avenue		Historic	Residence
5845 Hardy Avenue		Historic	Residence
6229 Montezuma Road		Historic	Residence
6237 Montezuma Road		Historic	Residence
6245 Montezuma Road		Historic	Residence
Adobe Falls Road		Historic	Residence

## Table 3.2Previously Identified Resources Within 1 Mile of APE

#### 3.5.2 Intensive Pedestrian Survey Results

No archaeological resources were observed during intensive pedestrian survey of the project area. The entire survey area was located on a north-facing slope, with only the area north of Chapultepec Hall and the adjacent parking lot providing a suitably mild grade for containing cultural resources. The canyon is heavily vegetated, and little ground surface was visible (Figure 4). The survey team inspected natural subsurface exposures to gauge the potential for subsurface cultural deposits (Figure 5). The area has been substantially disturbed by past construction of the adjacent building, parking area, road, and bank stabilization. As indicated by the presence and distribution of the numerous natural cobbles throughout the area, the underlying geologic formation appears to have been previously exposed and redeposited. The irregular, undulating surface topography further suggests previous earth-moving activities have occurred. Based on the present level of disturbance, the terrain, and the lack of cultural material on the surface, the area appears to have little potential to contain subsurface archaeological deposits. The developed portions of the APE were not of significant age. Chapultepec Hall and its ancillary buildings are of a modern utilitarian style and are not considered exemplary examples of architecture; nor were they designed by a master architect. For these reasons, the built environment is not considered significant.



SDSU New Student Housing Project Cultural Resources Technical Report San Diego State University

Figure 4 Steep, Vegetated Canyon Dominated APE West of Chapultepec Hall View North



SDSU New Student Housing Project Cultural Resources Technical Report



Figure 5 Ground Surface Exposures North of Chapultepec Hall View West

## 3.6 NAHC and Tribal Correspondence

On behalf of SDSU, Dudek sent a letter to NAHC, dated December 15, 2016, requesting that the NAHC conduct a search of the Sacred Lands File. Gale Totton, NAHC Associate Program Analyst, facilitated this search and returned the results to Dudek on December 19 (**Appendix B**). The search identified no previously identified Traditional Cultural Properties (TCPs) or sacred sites within one mile of the APE. As part of the consultation process, the NAHC included a list of tribal governments and individuals that should be consulted pursuant to the requirements of AB 52 (now codified at California Public Resources Code Sections 21083.3.1 and 21083.3.2). SDSU and its representatives have sent letters to the Native American representatives included on the consultation list requesting any information they may have concerning TCP within the APE.

To date, only the Jamul Indian Village, a Kumeyaay Nation and federally recognized Tribal Government, has responded to the AB 52 consultation letters (**Appendix B**). Representatives from the Jamul Indian Village, SDSU, and Dudek met on SDSU campus on February 7, 2017. Details of the project and the findings of this cultural resources inventory were discussed. The Jamul Indian Village representatives offered their services as tribal monitors should SDSU determine that tribal monitoring is necessary for the project. The Jamul Indian Village representatives did not identify any TCP within the project area, nor did they make any specific request for tribal monitoring of the current project.

## 4 THRESHOLDS OF SIGNIFICANCE

The following significance criteria included in Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) assist in determining the significance of a cultural resource impact. According to Appendix G, a significant impact related to cultural resources would occur if the project would:

- 1. Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5.
- 2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5.
- 3. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
- 4. Disturb any human remains, including those interred outside of formal cemeteries.
- 5. Result in a cumulative impact when considered with other present and probable future projects in the region.

Likewise, the significance of impacts to tribal cultural resources must also be determined. California Public Resources Code Section 21074(a) defines tribal cultural resources as one of the following:

- 1. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
  - a. Included or determined to be eligible for inclusion in the California Register of Historical Resources.
  - b. Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
- 2. 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

The following significance criteria included in Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) assist in determining the significance of a tribal cultural resource impact. According to Appendix G of the CEQA Guidelines, a significant impact related to tribal cultural resources would cause a substantial adverse change in the significance of a tribal cultural resource, defined in California Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope

of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:

- Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
- 2. 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 Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of the Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

As described in Section 3.3, Regulatory Setting, the treatment of historic resources, if found, is governed by federal and state laws and regulations, and there are specific criteria for determining whether or not a historic resource is significant and/or protected by law. A resource is eligible for listing in the CRHR if the State Historical Resources Commission determines that it is a significant resource and that it meets any of the following criteria:

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

Likewise, the Historical Resources Guidelines of the City of San Diego Land Development Manual identify the criteria under which a resource may be historically designated. The guidelines state that any improvement, building, structure, sign, interior element and fixture, site, place, district, area, or object may be designated a historical resource by the City Historical Resources Board if it meets one or more of the following designation criteria:

- a. Exemplifies or reflects special elements of the City's, a community's or a neighborhood's historical, archaeological, cultural, social, economic, political, aesthetic, engineering, landscaping or architectural development;
- b. 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 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; or
- 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.

Although SDSU, as a state agency (California State University), is not required to follow the City's historical resources evaluation guidelines, this guidance may be helpful in reaching a significance determination given its applicability to the San Diego built environment.

## 5 IMPACT ANALYSIS

## 5.1 **Project Impacts**

Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?

#### **Construction/Temporary Impacts**

#### Direct Impacts – Phases I, II, and III

No archaeological resources have been identified through the SCIC records search, NAHC and tribal correspondence, or through intensive pedestrian survey of the area. The area has been substantially disturbed, and is unlikely to contain intact cultural resources. As such, archaeological monitoring is not recommended. Construction related to the project will not have a direct impact to previously identified cultural resources. Should construction or other personnel encounter any historical, archaeological or Native American cultural material within the project area, the project would result in potentially significant impacts; therefore, mitigation is provided (see **MM-CUL-1** in **Section 6, Mitigation Measures**).

#### Indirect Impacts – Phases I, II, and III

No archaeological resources have been identified through the SCIC records search, NAHC and tribal correspondence, or through the intensive pedestrian survey of the area. The surrounding area has been substantially developed, and increased pedestrian traffic and use by construction personnel would pose little risk to previously recorded archaeological resources in the vicinity. As such, archaeological monitoring is not recommended. Should personnel encounter any previously undocumented cultural resources during construction activities, the project would result in a potentially significant impact; therefore, mitigation is provided (see **MM-CUL-1** in **Section 6, Mitigation Measures**).

#### **Operational/Permanent Impacts**

#### Direct Impacts – Phases I, II, and III

No archaeological resources have been identified through the SCIC records search, NAHC and tribal correspondence, or through the intensive pedestrian survey of the area. The area has been substantially disturbed, and is unlikely to contain intact cultural resources. As such, archaeological monitoring is not recommended. Should operational/permanent activities encounter any historical, archaeological or Native American cultural material within the project

area that has not been previously recorded, the project would result in a potentially significant impact; therefore, mitigation is provided (see **MM-CUL-1** in **Section 6**, **Mitigation Measures**).

#### Indirect Impacts – Phases I, II, and III

No archaeological resources have been identified through the SCIC records search, NAHC and tribal correspondence, or through the intensive pedestrian survey of the area. The surrounding area has been substantially developed and has defined routes of travel. Even substantially increased pedestrian traffic and use resulting through the operation of the project facilities would pose little risk to previously recorded archaeological resources in the vicinity. As such, archaeological monitoring is not recommended. Should personnel encounter any previously undocumented cultural resources during operational/permanent activities, the project would result in a significant impact; therefore, mitigation is provided (see MM-CUL-1 in Section 6, Mitigation Measures).

Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

#### **Construction/Temporary Impacts**

#### Direct Impacts – Phases I, II, and III

Geological units mapped within the proposed project area have paleontological sensitivities ranging from moderate to high and have produced significant paleontological resources in the past; therefore, the proposed project has the potential to come in contact with important paleontological resources, resulting in a significant impact. In light of this potential, precautionary mitigation is required. Following the recommendations of the San Diego Natural History Museum, we recommend a paleontological mitigation program to reduce any potential impacts to significant paleontological resources to a less-than-significant level (see **MM-CUL-2** in **Section 6, Mitigation Measures**).

No unique geological resources are known from within the proposed project area; therefore, no mitigation of impacts to unique geological resources is necessary.

#### Indirect Impacts – Phases I, II, and III

Indirect impacts to significant paleontological resources during the construction phase of a project include the potential for loss or destruction of fossils due to erosion, and the potential for illegal looting if fossils where exposed on the jobsite. Such impacts could be significant. To address this potential impact, installation of construction fencing and locked gates are

recommended to prevent access to work areas where paleontological resources may be exposed. Proper use of best management practices to minimize erosion are also recommended.

#### **Operational/Permanent Impacts**

#### Direct Impacts – Phases I, II, and III

Once construction is completed, no direct impacts to significant paleontological resources are anticipated; therefore, no mitigation is required after the excavation/construction phase of the proposed project.

#### Indirect Impacts – Phases I, II, and III

Upon completion of the proposed project, there are no anticipated indirect impacts to paleontological resources; therefore, no mitigation is required after the excavation/construction phase of the proposed project.

# Would the project disturb any human remains, including those interred outside of formal cemeteries?

#### **Construction/Temporary Impacts**

#### Direct Impacts – Phases I, II, and III

No human remains have been identified through the SCIC records search, NAHC and tribal correspondence, or through intensive pedestrian survey of the area. Construction related to the project will not have a direct impact to previously identified human remains. Should construction or other personnel encounter any previously undocumented human remains, the project would result in a potentially significant impact; therefore, contingent mitigation is provided (see **MM-CUL-3** in **Section 6, Mitigation Measures**).

#### Indirect Impacts – Phases I, II, and III

No human remains have been identified through the SCIC records search, NAHC and tribal correspondence, or through the intensive pedestrian survey of the area. The surrounding area has been substantially developed and has defined routes for travel. Should personnel encounter any previously undocumented human remains during construction activities, the project would result in a significant impact; therefore, contingent mitigation is provided (see **MM-CUL-3** in **Section 6, Mitigation Measures**).

#### **Operational/Permanent Impacts**

#### Direct Impacts – Phases I, II, and III

No human remains have been identified through the SCIC records search, NAHC and tribal correspondence, or through intensive pedestrian survey of the area. Operational/permanent activities related to the project will not have a direct impact to previously identified human remains since they would have been handled during initial discovery (during construction). However, should personnel encounter any previously undocumented human remains during operational/permanent activities, the project would result in a significant impact, therefore contingent mitigation is provided (see **MM-CUL-3** in **Section 6**, **Mitigation Measures**).

#### Indirect Impacts – Phases I, II, and III

No human remains have been identified through the SCIC records search, NAHC and tribal correspondence, or through intensive pedestrian survey of the area. The surrounding area has been substantially developed and has defined routes of travel, none of which would be altered by the project. Operational/permanent activities related to the project will not have an indirect impact on previously recorded human remains. Should personnel encounter any previously undocumented human remains during operational/permanent activities, the project would result in a significant impact; therefore, contingent mitigation is provided (see **MM-CUL-3** in **Section 6, Mitigation Measures**).

# Would the project result in a cumulatively impact when considered with other present and probable future projects in the region?

Future probable projects within the City of San Diego (City) may potentially contribute to cumulative impacts on cultural and paleontological resources. In many cases, site redesign or use of fill could minimize these adverse impacts. Total avoidance of the cultural and/or paleontological resources is not a reasonable expectation. Additionally, the increased human activity near cultural resources would lead to greater exposure and potential for illicit artifact collection and inadvertent impacts during construction. The City and County of San Diego both maintain guidelines and protocols for addressing project impacts to cultural and paleontological resources. These include both systematic surveys in areas of high site location potential to identify resources are discovered. Since no archaeological or paleontological resources have been identified through the records searches, NAHC and tribal correspondence, or through intensive pedestrian survey of the area and because the project area has been substantially developed with low potential for subsurface resources, the proposed project's contribution to

cumulative impacts on archaeological and paleontological resources would be less than cumulatively significant.

Would the project affect a resource listed or eligible for listing in the California Register of Historical Resources (CRHR), or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

#### Phases I, II, and III

No archaeological resources have been identified through the SCIC records search, NAHC and tribal correspondence, or through intensive pedestrian survey of the area. The area has been substantially disturbed, and is unlikely to contain intact cultural resources. Construction related to the project will not have an impact to CRHR listed or eligible cultural resources.

Would the project affect 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 Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of the Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

#### **Construction/Temporary Impacts**

#### Phases I, II, and III

To date, the Jamul Indian Village, a Kumeyaay Nation and federally recognized Tribal Government, has responded to the AB 52 consultation request. Representatives from the Jamul Indian Village, SDSU, and Dudek met on campus on February 7, 2017. Details of the project and the findings of this cultural resources inventory were discussed. The Jamul Indian Village representatives offered their services as tribal monitors should SDSU determine that tribal monitoring is necessary for the project. The Jamul Indian Village representatives did not identify any tribal cultural resources within the project area, nor did they make any specific request for tribal monitoring of the current project.

## 6 MITIGATION MEASURES

The following Mitigation Measures (MM) would reduce the potential for impacts on cultural resources.

- MM-CUL-1 In order to mitigate impacts to cultural resources to a level that is less than significant, procedures for proper treatment of unanticipated archaeological finds must comply with the California Environmental Quality Act (CEQA) Guidelines. In the event of discovery of unanticipated archaeological material, project personnel shall comply with the following requirements during initial earth-disturbing activities:
  - 1. Due to the disturbed nature of the project area, the negative archaeological inventory results, and the limited suitability to contain archaeological resources, an archaeological monitor is not required during construction. The decision to include a Native American monitor during initial ground disturbances of upper deposits within the project area is the responsibility of the reviewing agency.
  - 2. In the event that previously unidentified potentially significant cultural resources are discovered, construction or other personnel shall have the authority to divert or temporarily halt ground disturbance operations in the area while the appropriate San Diego State University (SDSU) representative is informed. SDSU shall then retain the services of a qualified archaeologist (i.e., listed on the Register of Professional Archaeologists). The qualified archaeologist, in consultation with SDSU staff, shall determine the significance of the discovered resources. Construction activities will be allowed to resume in the affected area only after proper evaluation. Isolates and clearly nonsignificant deposits shall be minimally documented in the field. For significant cultural resources, a Research Design and Data Recovery Program to mitigate impacts shall be prepared by the qualified archaeologist and approved by SDSU, then carried out using professional archaeological methods. The Research Design and Data Recovery Program shall include (1) reasonable efforts to preserve (avoidance) "unique" cultural resources or Sacred Sites pursuant to CEQA Section 21083.2(g) as the preferred option; (2) the capping of identified Sacred Sites or unique cultural resources and placement of development over the cap, if avoidance is infeasible; and (3) data recovery for non-unique cultural resources.
- **MM-CUL-2** In order to mitigate impacts to significant paleontological resources to a level that is less than significant, the following mitigation measure shall be implemented.

Prior to the commencement of project construction, CSU/SDSU, or its designee, shall retain a qualified paleontologist as defined by the Society of Vertebrate Paleontology guidelines (SVP 2010). The qualified paleontologist shall attend any pre-grade meetings, coordinate with the grading and excavation contractors, acting in accordance with the Society of Vertebrate Paleontology's Guidelines, and monitor all on-site activities associated with the original cutting of previously undisturbed sediments of moderate to high resources sensitivity in order to inspect such cuts for contained fossils.

In the event that the monitoring results in the discovery of potentially unique paleontological resources within the meaning of California Public Resources Code Section 21083.2, the qualified paleontologist will have the authority to halt excavation at that location and immediately evaluate the discovery. Following evaluation, if the resource is determined to be "unique" within the meaning of California Public Resources Code Section 21083.2, the site shall be treated in accordance with the provisions of that section. Mitigation appropriate to the discovered resource, including recovery, specimen preparation, data analysis, and reporting, shall be carried out in accordance with the Society of Vertebrate Paleontology guidelines prior to resuming grading activities at that location. Grading activities may continue on other parts of the building site while appropriate mitigation is implemented.

If fossils are discovered while the qualified paleontologist is not on site, an exclusion zone of approximately 50 feet shall be established using flagging and stakes and the qualified paleontologist and SDSU representative notified. No one shall be allowed into the exclusion zone until the qualified paleontologist has evaluated the find, removed it if deemed necessary, and removed the flagging.

If sediments appropriate for the preservation of microvertebrates are encountered while monitoring (as determined by the project paleontologist), test samples should be screened on or off site to determine the presence or absence of microvertebrates. If microvertebrate remains are recovered, then a standard sample as outlined in SVP (2010), or a lesser amount deemed appropriate by the qualified paleontologist, shall be collected and processed on or off site.

Recovered fossils, along with copies of pertinent field notes, photographs, and maps, shall be deposited in an accredited paleontological collections repository. A final summary report that discusses the methods used, stratigraphy exposed,

fossils collected, and significance of recovered fossils shall be prepared in a manner that is consistent with the Society of Vertebrate Paleontology guidelines.

- MM-CUL-3 In order to mitigate impacts to human remains to a level that is less than significant, procedures for proper treatment of unanticipated finds must comply with the CEQA Guidelines. In the event of discovery of unanticipated human remains, personnel shall comply with Public Resources Code Section 5097.98, CEQA Section 15064.5, and Health & Safety Code Section 7050.5 during earth-disturbing activities:
  - a. If any human remains are discovered, the construction personnel or the appropriate representative shall contact the County Coroner and SDSU. Upon identification of human remains, no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin. If 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 by the property owner or their representative in order to determine proper treatment and disposition of the remains. The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until with the Most Likely Descendant consultation regarding their recommendations as required by California Public Resources Code Section 5097.98 has been conducted. California Public Resources Code Section 5097.98, CEQA Section 15064.5 and Health & Safety Code Section 7050.5 shall be followed.

## 7 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Implementation of the Mitigation Measures identified above would mitigate any potential direct or indirect impacts caused by construction or operation of Phases I, II, and II of the project to unique cultural or tribal cultural resources that may be discovered on the project site to **less than significant**. Therefore, implementation of the proposed project would result in no significant or unavoidable impacts to these types of resources.

## 8 REFERENCES CITED

- Basgall, M.E., and M. Hall. 1990. "Adaptive Variation in the North-Central Mojave Desert." Paper presented at the 55th Annual Meeting of the Society for American Archaeology, Las Vegas, Nevada.
- Basgall, M. E., L. Johnson, and M. Hale. 2002. "An Evaluation of Four Archaeological Sites in the Lead Mountain Training Area, Marine Corps Air Ground Combat Center, Twentynine Palms, California." Submitted to U.S. Army Corps of Engineers, Fort Worth, Texas.
- Bean, L.J., and F.C. Shipek. 1978. "Luiseño." In Handbook of North American Indians, Vol. 8, California, edited by R.F. Heizer 550–563. Washington, D.C.: Smithsonian Institution.
- Boscana, G. 1846. "Chinigchinich; A Historical Account of the Origin, Customs, and Traditions of the Indians at the Missionary Establishment of St. Juan Capistrano, Alta California." In *Life in California*, by A. Robinson, 227–341. New York, New York: Wiley & Putnam.
- Byrd, B.F., and S.N. Reddy. 2002. "Late Holocene Adaptations along the Northern San Diego Coastline: New Perspectives on Old Paradigms." In *Cultural Complexity on the California Coast: Late Holocene Archaeological and Environmental Records*, edited by J.M. Erlandson and T.L. Jones, 41–62. Los Angeles, California: University of California– Los Angeles Press.
- City of San Diego. 2011. California Environmental Quality Act, Significance Determination Thresholds. Development Services Department.
- CSP (California State Parks). 2009. "Preservation Matters." *The Newsletter of the California Office of Historic Preservation* 2(3):3–21.
- Davis, E.L. 1978. *The Ancient Californians: Rancholabrean Hunters of the Mojave Lakes Country*. Los Angeles, California: Natural History Museum of Los Angeles County.
- Deméré, T.A. and S.L. Walsh. 1993. *Paleontological Resources, County of San Diego*. Prepared for the San Diego Planning Commission.
- Fages, P. 1937. A Historical, Political, and Natural Description of California (1775). Translated by H.I. Priestly. Berkeley, California: University of California Press.

- Gallegos, D.R. 1987. "San Dieguito-La Jolla: Chronology and Controversy." San Diego County Archaeological Society, Research Paper No. 1.
- Gallegos, D., and C. Kyle. 1988. *Five Thousand Years of Maritime Subsistence at Ballast Point Prehistoric Site SDI-48 (W-164), San Diego, California*. San Diego, California: WESTEC Services.
- Geiger, M. and C.W. Meighan. 1976. As the Padres Saw Them: California Indian Life and Customs as Reported by the Franciscan Missionaries, 1813–1815. Santa Barbara, California: Santa Barbara Mission Archive Library.
- Golla, V. 2007. "Linguistic Prehistory." In *California Prehistory: Colonization, Culture, and Complexity,* edited by T.L. Jones and K.A. Klar, 71–82. New York, New York: Altamira Press.
- Griset, S. 1996. "Southern California Brown Ware." Unpublished PhD dissertation; University of California, Riverside.
- Hale, M. 2001. "Technological Organization of the Millingstone Pattern in Southern California." Master's thesis; California State University, Sacramento.
- Hale, M. 2009. "San Diego and Santa Barbara: Socioeconomic Divergence in Southern California." PhD dissertation; University of California, Davis.
- Harrington, J.P. 1934. "A New Original Version of Boscana's Historical Account of the San Juan Capistrano Indians of Southern California." *Smithsonian Miscellaneous Collections* 92(4).
- Hector, S.M. 1984. "Late Prehistoric Hunter-Gatherer Activities in Southern San Diego County." PhD dissertation; University of California, Los Angeles.
- Johnson, J.R., and J.G. Lorenz. 2006. "Genetics, Linguistics, and Prehistoric Migrations: An Analysis of California Indian Mitochondrial DNA Lineages." *Journal of California and Great Basin Anthropology* 26:33–64.
- Kennedy, G.L. 1973. "A Marine Invertebrate Faunule from the Lindavista Formation, San Diego, California." *Transactions of the San Diego Society of Natural History*, 17(10):119–128, figs 1–3.
- Kennedy, M.P. 1975. "Geology of the Western San Diego Metropolitan Area, California." *California Division of Mines and Geology Bulletin.* 200-A:1-39.

- Kennedy, M.P., and Tan, S.S. 2008. "Geologic Map of the San Diego 30' x 60' Quadrangle, California" [map]. 1:100,000 scale, map no. 3. California Geological Survey, Regional Geologic Map Series
- Kroeber, A. 1925 *Handbook of the Indians of California*. Washington D.C.: Smithsonian Institution.
- Laylander, D. 1985. "Some Linguistic Approaches to Southern California's Prehistory." San Diego State University Cultural Resource Management Center Casual Papers 2(1):14–58.
- Laylander, D. 2000. *Early Ethnography of the Californias, 1533–1825.* Salinas, California: Coyote Press Archives of California Prehistory.
- Laylander, D. 2010. "Linguistic Prehistory." Research Issues In San Diego Prehistory. Accessed August 31, 2012. http://www.sandiegoarchaeology.org/Laylander/Issues/index.htm.
- Lightfoot, K. 2005. Indians, Missionaries, and Merchants: The Legacy of Colonial Encounters on the California Frontiers. Berkley, California: University of California Press.
- Luomala, K. 1978. "Tipai and Ipai." In *California*, edited by R.F. Heizer, 592–609. *Handbook of the North American Indians*, Vol. 8, W.C. Sturtevant, general editor. Washington, D.C.: Smithsonian Institution.
- McComas, K. 2016. Paleontological Record Search San Diego State University (SDSU) New Student Housing Project. Confidential paleontological records search letter from the San Diego Natural History Museum. December 29, 2016.
- Meighan, C.W. 1959. "California Cultures and the Concept of an Archaic Stage." *American Antiquity* 24:289–305.
- NPS and ACHP (National Park Service and the Advisory Council on Historic Preservation).
  1998. The Secretary of the Interior's Standards and Guidelines for Federal Agency Historic Preservation Programs Pursuant to the National Historic Preservation Act.
   Published jointly by the National Park Service of the U.S. Department of the Interior and the Advisory Council on Historic Preservation.
- Owen, R.C. 1965. "The Patrilineal Band: A Linguistically and Culturally Hybrid Social Unit." *American Anthropologist* 67:675–690.
- Pigniolo, A.R. 2004. "Points, Patterns, and People: Distribution of the Desert Side-Notched Point in San Diego." *Proceedings of the Society for California Archaeology* 14:27–39.

- Pigniolo, A.R. 2005. "Subsistence, Settlement, and Environmental Change at San Diego Bay." Proceedings of the Society for California Archaeology 18:255–259.
- Pourade, R.F. 1960–1967. *The History of San Diego*. 6 vols. San Diego, California: Union-Tribune Publishing Company.
- Preston, W.L. 2002. "Portents of Plague from California's Protohistoric Period." *Ethnohistory* 49:69–121.
- Rogers, M.J. 1929. "The Stone Art of the San Dieguito Plateau." *American Anthropologist* 31:454–467.
- Rogers, M.J. 1945. "An Outline of Yuman Pehistory." *Southwestern Journal of Anthropology* 1:167–198.
- San Diego County Board of Supervisors. 2007. County of San Diego CEQA Guidelines. San Diego: San Diego County.
- Shipek, F.C. 1982. "Kumeyaay Socio-Political Structure." *Journal of California and Great Basin Anthropology* 4:296–303.
- Shipek, F.C. 1985. "Kuuchamaa: The Kumeyaay Sacred Mountain." *Journal of California and Great Basin Anthropology* 7(1):67–74.
- Society of Vertebrate Paleontology. 2010. Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. http://vertpaleo.org/Membership/Member-Ethics/SVP\_Impact\_Mitigation\_Guidelines.aspx.
- Spier, L. 1923. "Southern Diegueño Customs." University of California Publications in American Archaeology and Ethnology 20:295–358.
- True, D.L. 1966. "Archaeological Differentiation of Shoshonean and Yuman Speaking Groups in Southern California." Unpublished PhD dissertation; University of California, Los Angeles.
- True, D.L. 1980. "The Pauma Complex in Northern San Diego County: 1978." *Journal of New World Archaeology* 3(4):1–39.
- Wallace, W.J. 1955. "A Suggested Chronology for Southern California Coastal Archaeology." *Southwestern Journal of Anthropology* 11:214–230.

- Warren, C.N. 1964. "Cultural Change and Continuity on the San Diego Coast." Unpublished PhD dissertation; University of California, Los Angeles.
- Warren, C.N. 1968. "Cultural Tradition and Ecological Adaptation on the Southern California Coast." In *Archaic Prehistory in the Western United States*, edited by C. Irwin-Williams, 1– 14. Portales, New Mexico: Eastern New Mexico University Contributions in Anthropology.
- Warren, C.N. and M.G. Pavesic. 1963. "Appendix 1: Shell Midden Analysis of Site SDi-603 and Ecological Implications for Cultural Development of Batiquitos Lagoon, San Diego County, California." In Archaeological Survey Annual Report. Los Angeles, California: University of California, Los Angeles.
- Warren, C.N., G. Siegler, and F. Dittmer. 2004. "Paleoindian and Early Archaic Periods." In Prehistoric and Historic Archaeology of Metropolitan San Diego: A Historic Properties Background Study. Prepared for the Metropolitan Wastewater Department, City of San Diego. Encinitas, California: ASM Affiliates.
- Wilken, M. 2012. "An Ethnobotany of Baja California's Kumeyaay Indians." Master's thesis; San Diego State University.
# **APPENDIX A (CONFIDENTIAL)** SCIC Records Search Results

# **APPENDIX B**

# NAHC Sacred Lands File Search Results



MAIN OFFICE 605 THIRD STREET ENCINITAS, CALIFORNIA V2024 T 760 942 5147 T 200.450 (RIN & 760 431 0144

December 12, 2016

Gayle Totton Associate Government Program Analyst Native American Heritage Commission

## Subject: NAHC Sacred Lands Records Search Request for the SDSU New Student Housing Project in San Diego, San Diego County, California

Dear Ms. Totton,

Dudek is conducting a cultural resources survey project for the San Diego State University (SDSU) New Student Housing project (Project). The approximately 8.0-acre project site consists of the existing Chapultepec Hall residential complex and the adjacent undeveloped lot. It is located within the SDSU campus boundary in San Diego, San Diego County, California. The project is located in unsectioned land of Township 16S, Range 2W on the U.S. Geological Survey (USGS) La Mesa 7.5' quadrangle.

Dudek is requesting a NAHC search for any sacred sites, traditional cultural properties, or other Native American cultural resources that may fall within a 1-mile buffer of the proposed project location (Figure 1). Please provide contact information for all Native American tribal representatives that should be consulted regarding these project activities. This information can be emailed or faxed to 760-632-0164.

If you have any questions about this investigation, please contact me directly by email or phone.

Regards,

Matthe M DG. O.

Matthew DeCarlo Archaeologist **DUDEK** Phone: (760) 632-0164 Email: mdecarlo@dudek.com

Attachments: Figure 1. Project location map.



SOURCE: USGS 7.5-Minute Series La Mesa Quadrangle Township 16S; Range 2W; Sections 9, 10, 14, 15, 16, 21, 22, 23

**Records Search Map** 

SDSU New Student Housing Project

Edmund G. Brown, Jr., Governor

## NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Blvd., Solle 100 West Sacramento, CA 95691 (916) 373-3710 Fax (916) 373-5471



December 19, 2016

Matthew DeCarlo Dudek

Sent by E-mail: mdecarlo@dudek.com

RE: Proposed SDSU New Student Housing Project, City of San Diego; La Mesa USGS Quadrangle, San Diego County, California

Dear Mr. DeCarlo:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File was completed for the area of potential project effect (APE) referenced above with <u>negative</u> results. Please note that the absence of specific site information in the Sacred Lands File does not indicate the absence of Native American cultural resources in any APE.

Attached is a list of tribes culturally affiliated to the project area. I suggest you contact all of the listed Tribes. If they cannot supply information, they might recommend others with specific knowledge. The list should provide a starting place to locate areas of potential adverse impact within the APE. By contacting all those on the list, your organization will be better able to respond to claims of failure to consult. If a response has not been received within two weeks of notification, the NAHC requests that you follow-up with a telephone call to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from any of these individuals or groups, please notify me. With your assistance we are able to assure that our lists contain current information. If you have any questions or need additional information, please contact via email: gayle.totton@nahc.ca.gov.

Sincerely,

ale Sath

Gayle Totton, M.A., PhD. Associate Governmental Program Analyst

#### Native American Heritage Commission Tribal Consultation List San Diego County 12/19/2016

## Barona Group of the Capitan

Grande Clifford LaChappa, Chairperson 1095 Barona Road Lakeside, CA, 92040 Phone: (619) 443 - 6612 Fax: (619) 443-0681 cloyd@barona-nsn.gov

#### **Campo Band of Mission Indians**

Ralph Goff, Chairperson 36190 Church Road, Suite 1 Kumeyaay Campo, CA, 91906 Phone: (619)478-9046 Fax: (619)478-5818 rgoff@campo-nsn.gov

#### Ewilaapaayp Tribal Office

Robert Pinto, Chairperson 4054 Willows Road Alpine, CA, 91901 Phone: (619)445-6315 Fax: (619)445-9126

#### Ewilaapaayp Tribal Office

Michael Garcia, Vice Chairperson 4054 Willows Road Kumeyaay Alpine, CA, 91901 Phone: (619) 445 - 6315 Fax: (619) 445-9126 michaelg@leaningrock.net

## lipay Nation of Santa Ysabel

Clint Linton, Director of Cultural Resources P.O. Box 507 Santa Ysabel, CA, 92070 Phone: (760) 803 - 5694 cjlinton73@aol.com

#### lipay Nation of Santa Ysabel

Virgil Perez, Chairperson P.O. Box 130 Santa Ysabel, CA, 92070 Phone: (760)765-0845 Fax: (760)765-0320

Kumeyaay

Kumeyaay

#### Inaja Band of Mission Indians

Rebecca Osuna, Chairperson 2005 S. Escondido Blvd. Escondido, CA, 92025 Phone: (760)737-7628 Fax: (760)747-8568

Kumeyaay

Kumeyaay

Kumeyaay

Kumeyaay

## Jamul Indian Village

Erica Pinto, Chairperson P.O. Box 612 Jamul, CA, 91935 Phone: (619)669-4785 Fax: (619)669-4817

#### *Kwaaymii Laguna Band of Mission Indians* Carmen Lucas, P.O. Box 775 Pine Valley, CA, 91962

Phone: (619)709-4207

#### La Posta Band of Mission

Indians Javaughn Miller, Tribal Administrator 8 Crestwood Road Boulevard, CA, 91905 Phone: (619) 478 - 2113 Fax: (619) 478-2125 jmiller@LPtribe.net

## La Posta Band of Mission

Indians Gwendolyn Parada, Chairperson 8 Crestwood Road Kumeyaay Boulevard, CA, 91905 Phone: (619)478-2113 Fax: (619)478-2125 LP13boots@aol.com

#### Manzanita Band of Kumeyaay Nation

Angela Elliott Santos, Chairperson P.O. Box 1302 Boulevard, CA, 91905 Phone: (619) 766 - 4930 Fax: (619) 766-4957

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resource Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed San Diego State University New Student Housing Project, San Diego County.

#### Kumeyaay

Kumey

#### Native American Heritage Commission Tribal Consultation List San Diego County 12/19/2016

#### Manzanita Band of Kumeyaay

Nation Nick Elliott, Cultural Resources Coordinator P. O. Box 1302 Boulevard, CA, 91905 Phone: (619) 766 - 4930 Fax: (619) 766-4957 nickmepa@yahoo.com

Kumeyaay

#### Mesa Grande Band of Mission

Indians Virgil Oyos, Chairperson P.O Box 270 Santa Ysabel, CA, 92070 Phone: (760)782-3818 Fax: (760)782-9092 mesagrandeband@msn.com

#### San Pasqual Band of Mission Indians

John Flores, Environmental Coordinator P. O. Box 365 Valley Center, CA, 92082 Phone: (760) 749 - 3200 Fax: (760) 749-3876 johnf@sanpasqualtribe.org

#### San Pasqual Band of Misslon Indians

Allen E. Lawson, Chairperson P.O. Box 365 Valley Center, CA, 92082 Phone: (760)749-3200 Fax: (760)749-3876 alleni@sanpasqualtribe.org

## Sycuan Band of the Kumeyaay Nation

Cody J. Martinez, Chairperson 1 Kwaaypaay Court Kumeyaay El Cajon, CA, 92019 Phone: (619)445-2613 Fax: (619)445-1927 ssilva@sycuan-nsn.gov

#### Sycuan Band of the Kumeyaay Nation

Lisa Haws, Cultural Resources Manager 1 Kwaaypaay Court El Cajon, CA, 92019 Phone: (619) 312 - 1935

Kumeyaay

### Viejas Band of Kumeyaay

Indians Julie Hagen, 1 Viejas Grade Road Alpine, CA, 91901 Phone: (619) 445 - 3810 Fax: (619) 445-5337 jhagen@viejas-nsn.gov

Kumeyaay

#### Viejas Band of Kumeyaay indians

Robert J. Welch, Chairperson 1 Viejas Grade Road Alpine, CA, 91901 Phone: (619)445-3810 Fax: (619)445-5337 jhagen@viejas-nsn.gov

Kumeyaay

## This first is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7060.5 of the Health and Safety Code, Section 5097.94 of the Public Resource Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed San Diego State University New Student Housing Project, San Diego County.



San Diego State University Facilities Planning, Design, and Construction 5500 Campanile Drive San Diego, Ca 92182-1624

Re: Formal Request for Tribal Consultation for New Student Housing Project

#### Dear Laura Shinn,

The Jamul Indian Village, a Kumeyaay Nation and a federally recognized Tribal Government ("Tribe") is in receipt of the **San Diego State University**. notice regarding the above stated project in San Diego County. The Tribe has reviewed the information provided and has determined that the Project falls within the boundaries of the Tribes area of traditional and cultural affiliation. In addition, there is the potential for the Project to impact Tribal Cultural Resources, as defined by PUBLIC RESOURCES CODE §21074 New Student Housing Project. Therefore, the Tribe hereby requests consultation on the proposed Project, as described below.

The Tribe is part of the Kumeyaay Nation, which lived in present day San Diego Country, parts of Imperial County and northern Mexico for thousands of years. Although much of the Tribe's traditional use area is no longer under the jurisdiction of the Tribe, the Tribe's connection to the Tribal Cultural Resources outside of the reservation boundaries remains. Tribal Cultural Resources not only provide a connection to our past, but also serve an important role in our culture today. Therefore, the protection of Tribal Cultural Resources, on and off the reservation is of utmost importance to the Tribe and its citizens. To that end, the Tribe appreciates your compliance the California Environmental Quality Act and its guidelines and is hopeful that meaningful consultation, as defined by Government Code §65352.4, will result.

The Tribe requests for consultation under the provisions of the California Environmental Quality Act (PUBLIC RESOURCES CODE §21080.3.1) for the mitigation of potential Project impacts to Tribal Cultural Resources for the Project. The Tribe requests consultation on the following topics, which shall be included in consultation: (1) alternatives to the project; (2) recommended mitigation measures; and (3) significant effects of the Project.

The Tribe also requests consultation on the following discretionary topics checked below:

- Type of environmental review necessary
- Significance of Tribal Cultural Resources, including any guidelines, regulations, policies or standards used by your Agency to determine the presence of Tribal Cultural Resources and their significance
- The Project's potential impacts on Tribal Cultural Resources

info@jamulindianvillage.com

619.669.4785 619.669.4817 P. O. Box 612 Jamul, CA 91935 Project alternatives and/or appropriate measures for preservation and/or mitigation that the Tribe may recommend, including, but not limited to:

(1) Avoidance and preservation of the resources in place, pursuant to PUBLIC RESOURCES CODE §21084.3, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks or other open space, to incorporate the resources with culturally appropriate protection and management criteria;

(2) Treating the resources with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resources, including but not limited to the following:

(a) Protecting the cultural character and integrity of the resource;

(b) Protection the traditional use of the resource; and

(c) Protecting the confidentiality of the resource.

(3) Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.

(4) Protecting the Tribal Cultural Resources in place.

Additionally, the Tribe would like to receive any cultural resources assessments or other assessments that have been completed on all or part of the Project's potential "area of Project effect" ("APE"), including, but not limited to:

- (1) The results of any record search that may have been conducted at an Information Center of the California Historical Resources Information System ("CHRIS"), including, but not limited to:
  - (a) A listing of any and all known cultural resources have already been recorded on or adjacent to the APE;
  - (b) Copies of any and all cultural resource records and study reports that may have been provided by the Information Center as part of the records search response;
  - (c) If the probability is low, moderate, or high that cultural resources are located in the APE.
  - (d) Whether the records search indicates a low, moderate or high probability that unrecorded cultural resources are located in the potential APE; and
  - (e) If a survey is recommended by the Information Center to determine whether previously unrecorded cultural resources are present.
- (2) The results of any archaeological inventory survey that was conducted, including:
  - (a) Any report that may contain site forms, site significance, and suggested mitigation measures.
  - (b) All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure in accordance with Government Code Section 6254.10.
- (3) The results of any Sacred Lands File ("SFL") check conducted through Native American Heritage Commission. The request form can be found at http://www.nahc.ca.gov/slf\_request.html. United States Geological Survey 7.5minute quadrangle name, township, range, and section required for the search.
- (4) Any ethnographic studies conducted for any area including all or part of the potential APE; and

-2-

(5) Any geotechnical reports regarding all or part of the potential APE.

The Tribe would like to remind your agency that CEQA Guidelines section 15126.4(b)(3) states that preservation in place is the preferred manner of mitigating impacts to archaeological sites. Section 15126.4(b)(3) of the CEQA Guidelines has been interpreted by the California Court of Appeal to mean that "feasible preservation in place must be adopted to mitigate impacts to historical resources of an archaeological nature unless the lead agency determines that another form of mitigation is available and provides superior mitigation of impacts." Madera Oversight Coalition v. County of Madera (2011) 199 Cal.App.4th 48, disapproved on other grounds, Neighbors for Smart Rail v. Exposition Metro Line Construction Authority (2013) 57 Cal.4th 439.

The Tribe is requesting a face-to-face meeting between the Agency and the Tribe's representatives to initiate the consultation. Please contact me at your earliest convenience either by email or phone in order to make arrangements.

Kind Regards,

Carline A. Chomkertain

Carlene Chamberlain Executive Council Member Jamul Indian Village

cc: Native American Heritage Commission



## Figure 3 Records Search Map

SDSU New Student Housing Project



SDSU West Campus Housing Complex



Figure 2 Project Area Map



Real Estate, Planning and Development Business and Financial Affairs San Diego State University 5500 Campanile Drive San Diego CA 92182-1820 Fel: 619 - 594-6017 Fax: 619 - 594-6022 Email: sschulz@mail.sdsi.edu

Robert Schuiz American Vice President San Diego State University

December 20, 2016

Julie Hagen Viejas Band of Kumeyaay Indians 1 Viejas Grade Road, Alpine, CA 91901

## Re: Notification of the Proposed SDSU New Student Housing Expansion Project Pursuant to California Assembly Bill 52.

Dear Julie,

Pursuant to California Assembly Bill (AB) 52, San Diego State University (SDSU), as a representative of the Board of Trustees of the California State University, is providing you with notification of the SDSU New Student Housing Expansion Project (proposed project), located at SDSU in the City of San Diego, San Diego County, California. While SDSU has not yet received a request from your tribe to be notified of specific projects within a designated geographic area, we are reaching out to all groups listed on the California Native American Heritage Commission's Sacred Lands File consultation list in a good faith effort to provide notification of the proposed project to groups that are traditionally or culturally affiliated with the geographic area of the proposed project.

#### **Project Location**

The campus is situated along Interstate 8 (I-8) about 10 miles from downtown San Diego (Figure 1, Regional Map, and Figure 2, Project Area Map). The proposed project would be located on a 7.84-acre site at the northwest corner of the main SDSU campus. The campus is part of the College Area Community of the City of San Diego. The proposed project is located in unsectioned land of Township 16 South, Range 2 West within the La Mesa 7.5-minute quadrangle, as mapped by the U.S. Geological Survey (Figure 3 Record Search Map).

### **Project Description**

Sincerely,

Robert Schulz

Associate Vice President, Real Estate, Planning & Development San Diego State University

Real Estate, Planning and Development Business and Financial Affairs San Diego State University 5500 Campanile Drive San Diego CA 92182-1620 Tel: 619 - 594-6017 Fax: 619 - 594-6022 Email: schulz@mail.sdsu.edu

Robert Schulz Autociate Vice President San Diego State University

December 20, 2016

Lisa Haws Sycuan Band of the Kumeyaay Nation 1 Kwaaypaay Court, El Cajon, CA 92019

## Re: Notification of the Proposed SDSU New Student Housing Expansion Project Pursuant to California Assembly Bill 52.

Dear Lisa,

Pursuant to California Assembly Bill (AB) 52, San Diego State University (SDSU), as a representative of the Board of Trustees of the California State University, is providing you with notification of the SDSU New Student Housing Expansion Project (proposed project), located at SDSU in the City of San Diego, San Diego County, California. While SDSU has not yet received a request from your tribe to be notified of specific projects within a designated geographic area, we are reaching out to all groups listed on the California Native American Heritage Commission's Sacred Lands File consultation list in a good faith effort to provide notification of the proposed project to groups that are traditionally or culturally affiliated with the geographic area of the proposed project.

### **Project Location**

The campus is situated along Interstate 8 (I-8) about 10 miles from downtown San Diego (Figure 1, Regional Map, and Figure 2, Project Area Map). The proposed project would be located on a 7.84-acre site at the northwest corner of the main SDSU campus. The campus is part of the College Area Community of the City of San Diego. The proposed project is located in unsectioned land of Township 16 South, Range 2 West within the La Mesa 7.5-minute quadrangle, as mapped by the U.S. Geological Survey (Figure 3 Record Search Map).

### **Project Description**

Sincerely,

Robert Schulz Associate Vice President, Real Estate, Planning & Development San Diego State University

Real Estate, Planning and Development Hustness and Financial Affairs San Diego State University 5500 Campanile Drive San Diego CA 92182-1620 Tel: 619 - 594-6017 Feas: 619 - 594-6022 Email: eschulz@mail.sdsu.edu

Robert Schule Asunchite Vice President San Diego State University

December 20, 2016

Cody J Martinez Sycuan Band of the Kumeyaay Nation 1 Kwaaypaay Court, El Cajon, CA 92019

## Re: Notification of the Proposed SDSU New Student Housing Expansion Project Pursuant to California Assembly Bill 52.

Dear Cody,

Pursuant to California Assembly Bill (AB) 52, San Diego State University (SDSU), as a representative of the Board of Trustees of the California State University, is providing you with notification of the SDSU New Student Housing Expansion Project (proposed project), located at SDSU in the City of San Diego, San Diego County, California. While SDSU has not yet received a request from your tribe to be notified of specific projects within a designated geographic area, we are reaching out to all groups listed on the California Native American Heritage Commission's Sacred Lands File consultation list in a good faith effort to provide notification of the proposed project to groups that are traditionally or culturally affiliated with the geographic area of the proposed project.

#### **Project Location**

The campus is situated along Interstate 8 (I-8) about 10 miles from downtown San Diego (Figure 1, Regional Map, and Figure 2, Project Area Map). The proposed project would be located on a 7.84-acre site at the northwest corner of the main SDSU campus. The campus is part of the College Area Community of the City of San Diego. The proposed project is located in unsectioned land of Township 16 South, Range 2 West within the La Mesa 7.5-minute quadrangle, as mapped by the U.S. Geological Survey (Figure 3 Record Search Map).

#### **Project Description**

Sincerely,

Robert Schulz Associate Vice President, Real Estate, Planning & Development San Diego State University

Real Estate, Planning and Development Business and Financial Affairs San Diego State University 5500 Comparate Drive San Diego CA 92182-1620 Tel: 619 - 594 - 6012 Fax: 619 - 594 - 6022 Email: rschulz@mail.sdau.edu

Robert Schulz Associate Vice President SAN DIEGO STAFE UNIVERSITY

December 20, 2016

John Flores San Pasqual Band of Mission Indians PO Box 365, Valley Center, CA 92082

## Re: Notification of the Proposed SDSU New Student Housing Expansion Project Pursuant to California Assembly Bill 52.

Dear John,

Pursuant to California Assembly Bill (AB) 52, San Diego State University (SDSU), as a representative of the Board of Trustees of the California State University, is providing you with notification of the SDSU New Student Housing Expansion Project (proposed project), located at SDSU in the City of San Diego, San Diego County, California. While SDSU has not yet received a request from your tribe to be notified of specific projects within a designated geographic area, we are reaching out to all groups listed on the California Native American Heritage Commission's Sacred Lands File consultation list in a good faith effort to provide notification of the proposed project to groups that are traditionally or culturally affiliated with the geographic area of the proposed project.

#### **Project Location**

The campus is situated along Interstate 8 (I-8) about 10 miles from downtown San Diego (Figure 1, Regional Map, and Figure 2, Project Area Map). The proposed project would be located on a 7.84-acre site at the northwest corner of the main SDSU campus. The campus is part of the College Area Community of the City of San Diego. The proposed project is located in unsectioned land of Township 16 South, Range 2 West within the La Mesa 7.5-minute quadrangle, as mapped by the U.S. Geological Survey (Figure 3 Record Search Map).

#### **Project Description**

If you have any comments or concerns regarding potential impacts to tribal cultural resources (as defined in Public Resources Code § 21074) in relation to the proposed project, please provide a written request for consultation to the address above or via email to Laura Shinn at <a href="https://www.laural.solution.com">https://www.laural.solution.com</a> receipt of this notice and include the name of a designated lead contact person.

Sincerely,

Robert Schulz Associate Vice President, Real Estate, Planning & Development San Diego State University

Real Estale, Planning and Development Business and Financial Affairs San Diego Stale University 5500 Campordle Drive San Diego CA 92182-1620 Tel: 619 - 594-6017 Fax: 619 - 594-60122 Email: octual:0mmil.sduc.edu

Robert Schulz Associate Vice President SAN DIEGO STATE UNIVERSITY

December 20, 2016

Allen E Lawson San Pasqual Band of Mission Indians PO Box 365, Valley Center, CA 92082

## Re: Notification of the Proposed SDSU New Student Housing Expansion Project Pursuant to California Assembly Bill 52.

Dear Allen,

Pursuant to California Assembly Bill (AB) 52, San Diego State University (SDSU), as a representative of the Board of Trustees of the California State University, is providing you with notification of the SDSU New Student Housing Expansion Project (proposed project), located at SDSU in the City of San Diego, San Diego County, California. While SDSU has not yet received a request from your tribe to be notified of specific projects within a designated geographic area, we are reaching out to all groups listed on the California Native American Heritage Commission's Sacred Lands File consultation list in a good faith effort to provide notification of the proposed project to groups that are traditionally or culturally affiliated with the geographic area of the proposed project.

#### **Project Location**

The campus is situated along Interstate 8 (I-8) about 10 miles from downtown San Diego (Figure 1, Regional Map, and Figure 2, Project Area Map). The proposed project would be located on a 7.84-acre site at the northwest corner of the main SDSU campus. The campus is part of the College Area Community of the City of San Diego. The proposed project is located in unsectioned land of Township 16 South, Range 2 West within the La Mesa 7.5-minute quadrangle, as mapped by the U.S. Geological Survey (Figure 3 Record Search Map).

#### **Project Description**

Sincerely,

Robert Schulz Associate Vice President, Real Estate, Planning & Development San Diego State University

Real Estate, Planning and Development Business and Financial Affairs San Dargo State University 5500 Camponile Drive San Diego CA 92182-1620 Tel: 619 - 594-6017 Fax: 619 - 594-6017 Fax: 619 - 594-6012 Email: rschulz@mnil.sdsu.octu

Robert Schulz Associate Vice President SAN DIEGO STATE UNIVERSITY

December 20, 2016

Virgil Oyos Mesa Grande Band of Mission Indians PO Box 270, Santa Ysabel, CA 92070

## Re: Notification of the Proposed SDSU New Student Housing Expansion Project Pursuant to California Assembly Bill 52.

Dear Virgil,

Pursuant to California Assembly Bill (AB) 52, San Diego State University (SDSU), as a representative of the Board of Trustees of the California State University, is providing you with notification of the SDSU New Student Housing Expansion Project (proposed project), located at SDSU in the City of San Diego, San Diego County, California. While SDSU has not yet received a request from your tribe to be notified of specific projects within a designated geographic area, we are reaching out to all groups listed on the California Native American Heritage Commission's Sacred Lands File consultation list in a good faith effort to provide notification of the proposed project to groups that are traditionally or culturally affiliated with the geographic area of the proposed project.

#### **Project Location**

The campus is situated along Interstate 8 (I-8) about 10 miles from downtown San Diego (Figure 1, Regional Map, and Figure 2, Project Area Map). The proposed project would be located on a 7.84-acre site at the northwest corner of the main SDSU campus. The campus is part of the College Area Community of the City of San Diego. The proposed project is located in unsectioned land of Township 16 South, Range 2 West within the La Mesa 7.5-minute quadrangle, as mapped by the U.S. Geological Survey (Figure 3 Record Search Map).

#### **Project Description**

Sincerely,

Robert Schulz Associate Vice President, Real Estate, Planning & Development San Diego State University

Real Estate, Planning and Development Business and Financial Affairs San Diego State University 5500 Campanile Drive San Diego CA 92182-1880 Tel: 619 - 594-6017 Fax: 619 - 594-6017 Fax: 619 - 594-6022 Erroit schulz@mail.sdsu.eth

Robert Schulz Associate Vice President San Diego State University

December 20, 2016

Nick Elliott Manzanita Band of Kumeyaay Nation PO Box 1302, Boulevard, CA 91905

## Re: Notification of the Proposed SDSU New Student Housing Expansion Project Pursuant to California Assembly Bill 52.

Dear Nick,

Pursuant to California Assembly Bill (AB) 52, San Diego State University (SDSU), as a representative of the Board of Trustees of the California State University, is providing you with notification of the SDSU New Student Housing Expansion Project (proposed project), located at SDSU in the City of San Diego, San Diego County, California. While SDSU has not yet received a request from your tribe to be notified of specific projects within a designated geographic area, we are reaching out to all groups listed on the California Native American Heritage Commission's Sacred Lands File consultation list in a good faith effort to provide notification of the proposed project to groups that are traditionally or culturally affiliated with the geographic area of the proposed project.

#### **Project Location**

The campus is situated along Interstate 8 (I-8) about 10 miles from downtown San Diego (Figure 1, Regional Map, and Figure 2, Project Area Map). The proposed project would be located on a 7.84-acre site at the northwest corner of the main SDSU campus. The campus is part of the College Area Community of the City of San Diego. The proposed project is located in unsectioned land of Township 16 South, Range 2 West within the La Mesa 7.5-minute quadrangle, as mapped by the U.S. Geological Survey (Figure 3 Record Search Map).

### **Project Description**

Sincerely,

Robert Schulz

Associate Vice President, Real Estate, Planning & Development San Diego State University

Real Estate, Planning and Development Business and Financial Affairs San Diego State University 5500 Camparile Drive San Diego CA 92182, 1620 Tel: 619 - 594 - 6017 Fax: 619 - 594 - 6022 Email: rechulz/finantLs/sucedu

Robert Schulz Associate Vice President San Diego State University

December 20, 2016

Javaughn Miller La Posta Band of Mission Indians 8 Crestwood Road, Boulevard, CA 91905

## Re: Notification of the Proposed SDSU New Student Housing Expansion Project Pursuant to California Assembly Bill 52.

Dear Javaughn,

Pursuant to California Assembly Bill (AB) 52, San Diego State University (SDSU), as a representative of the Board of Trustees of the California State University, is providing you with notification of the SDSU New Student Housing Expansion Project (proposed project), located at SDSU in the City of San Diego, San Diego County, California. While SDSU has not yet received a request from your tribe to be notified of specific projects within a designated geographic area, we are reaching out to all groups listed on the California Native American Heritage Commission's Sacred Lands File consultation list in a good faith effort to provide notification of the proposed project to groups that are traditionally or culturally affiliated with the geographic area of the proposed project.

### **Project Location**

The campus is situated along Interstate 8 (I-8) about 10 miles from downtown San Diego (Figure 1, Regional Map, and Figure 2, Project Area Map). The proposed project would be located on a 7.84-acre site at the northwest corner of the main SDSU campus. The campus is part of the College Area Community of the City of San Diego. The proposed project is located in unsectioned land of Township 16 South, Range 2 West within the La Mesa 7.5-minute quadrangle, as mapped by the U.S. Geological Survey (Figure 3 Record Search Map).

#### Project Description

Sincerely,

Robert Schulz Associate Vice President, Real Estate, Planning & Development San Diego State University

Real Estate, Planning and Development Businese and Financial Affairs San Diego State University 5500 Camparile Drive San Diego CA 92182-1620 Tel: 619 - 594-6017 Fax: 619 - 594-6022 Email: rechulz@muil.adsu.edu

Robert Schulz Associate Vice President SAN DIEGO STATE UNIVERSITY

December 20, 2016

Gwendolyn Parada La Posat Band of Mission Indians 8 Crestwood Road, Boulevard, CA 91905

## Re: Notification of the Proposed SDSU New Student Housing Expansion Project Pursuant to California Assembly Bill 52.

Dear Gwendolyn,

Pursuant to California Assembly Bill (AB) 52, San Diego State University (SDSU), as a representative of the Board of Trustees of the California State University, is providing you with notification of the SDSU New Student Housing Expansion Project (proposed project), located at SDSU in the City of San Diego, San Diego County, California. While SDSU has not yet received a request from your tribe to be notified of specific projects within a designated geographic area, we are reaching out to all groups listed on the California Native American Heritage Commission's Sacred Lands File consultation list in a good faith effort to provide notification of the proposed project to groups that are traditionally or culturally affiliated with the geographic area of the proposed project.

#### **Project Location**

The campus is situated along Interstate 8 (I-8) about 10 miles from downtown San Diego (Figure 1, Regional Map, and Figure 2, Project Area Map). The proposed project would be located on a 7.84-acre site at the northwest corner of the main SDSU campus. The campus is part of the College Area Community of the City of San Diego. The proposed project is located in unsectioned land of Township 16 South, Range 2 West within the La Mesa 7.5-minute quadrangle, as mapped by the U.S. Geological Survey (Figure 3 Record Search Map).

### **Project Description**

Sincerely,

Robert Schulz Associate Vice President, Real Estate, Planning & Development San Diego State University

Real Estate, Planning and Development Business and Financial Affairs San Diego State University 5500 Companile Drive San Diego CA 92182+1620 Tel: 619 - 594-6017 Fax: 619 - 594-6017 Fax: 619 - 594-6022 Email: rechulz@mail.sdsu.edu

Robert Schulz Associate Vice President



December 20, 2016

Cannen Lucas Kwaaynii Laguna Band of Mission Indians PO Box 775, Pine Valley, CA 91962

## Re: Notification of the Proposed SDSU New Student Housing Expansion Project Pursuant to California Assembly Bill 52.

Dear Carmen,

Pursuant to California Assembly Bill (AB) 52, San Diego State University (SDSU), as a representative of the Board of Trustees of the California State University, is providing you with notification of the SDSU New Student Housing Expansion Project (proposed project), located at SDSU in the City of San Diego, San Diego County, California. While SDSU has not yet received a request from your tribe to be notified of specific projects within a designated geographic area, we are reaching out to all groups listed on the California Native American Heritage Commission's Sacred Lands File consultation list in a good faith effort to provide notification of the proposed project to groups that are traditionally or culturally affiliated with the geographic area of the proposed project.

#### **Project Location**

The campus is situated along Interstate 8 (I-8) about 10 miles from downtown San Diego (Figure 1, Regional Map, and Figure 2, Project Area Map). The proposed project would be located on a 7.84-acre site at the northwest corner of the main SDSU campus. The campus is part of the College Area Community of the City of San Diego. The proposed project is located in unsectioned land of Township 16 South, Range 2 West within the La Mesa 7.5-minute quadrangle, as mapped by the U.S. Geological Survey (Figure 3 Record Search Map).

#### **Project Description**

Sincerely,

Robert Schulz Associate Vice President, Real Estate, Planning & Development San Diego State University
Real Estate, Planning and Development Business and Financial Affairs San Diego State University 5500 Campanile Drive San Diego CA 92182-1620 Tel: 619 - 594 - 6017 Pax: 619 - 594 - 6012 Email: rschulz@mail.schut.ectu

Robert Schulz Associate Vice Parameter SAN DIEGO STATE UNIVERSITY

December 20, 2016

Erica Pinto Jamul Indian Village PO Box 612, Jamul, CA 91935

# Re: Notification of the Proposed SDSU New Student Housing Expansion Project Pursuant to California Assembly Bill 52.

Dear Erica,

Pursuant to California Assembly Bill (AB) 52, San Diego State University (SDSU), as a representative of the Board of Trustees of the California State University, is providing you with notification of the SDSU New Student Housing Expansion Project (proposed project), located at SDSU in the City of San Diego, San Diego County, California. While SDSU has not yet received a request from your tribe to be notified of specific projects within a designated geographic area, we are reaching out to all groups listed on the California Native American Heritage Commission's Sacred Lands File consultation list in a good faith effort to provide notification of the proposed project to groups that are traditionally or culturally affiliated with the geographic area of the proposed project.

#### **Project Location**

The campus is situated along Interstate 8 (I-8) about 10 miles from downtown San Diego (Figure 1, Regional Map, and Figure 2, Project Area Map). The proposed project would be located on a 7.84-acre site at the northwest corner of the main SDSU campus. The campus is part of the College Area Community of the City of San Diego. The proposed project is located in unsectioned land of Township 16 South, Range 2 West within the La Mesa 7.5-minute quadrangle, as mapped by the U.S. Geological Survey (Figure 3 Record Search Map).

### **Project Description**

Sincerely,

Robert Schulz Associate Vice President, Real Estate, Planning & Development San Diego State University

Real Estate, Planning and Development Business and Financial Affairs San Diego State University 5500 Campanile Drive San Diego CA 92182-1620 Tel: 619 - 594 - 6012 Fax: 619 - 594 - 6022 Email: rschule@mail.sdau.edu

Robert Schotz Annelate Vice President



December 20, 2016

Rebecca Osuna Inaja Band of Mission Indians 2005 S. Escondido Blvd, Escondido, CA 92025

## Re: Notification of the Proposed SDSU New Student Housing Expansion Project Pursuant to California Assembly Bill 52.

Dear Rebecca,

Pursuant to California Assembly Bill (AB) 52, San Diego State University (SDSU), as a representative of the Board of Trustees of the California State University, is providing you with notification of the SDSU New Student Housing Expansion Project (proposed project), located at SDSU in the City of San Diego, San Diego County, California. While SDSU has not yet received a request from your tribe to be notified of specific projects within a designated geographic area, we are reaching out to all groups listed on the California Native American Heritage Commission's Sacred Lands File consultation list in a good faith effort to provide notification of the proposed project to groups that are traditionally or culturally affiliated with the geographic area of the proposed project.

### **Project Location**

The campus is situated along Interstate 8 (I-8) about 10 miles from downtown San Diego (Figure 1, Regional Map, and Figure 2, Project Area Map). The proposed project would be located on a 7.84-acre site at the northwest corner of the main SDSU campus. The campus is part of the College Area Community of the City of San Diego. The proposed project is located in unsectioned land of Township 16 South, Range 2 West within the La Mesa 7.5-minute quadrangle, as mapped by the U.S. Geological Survey (Figure 3 Record Search Map).

# **Project Description**

Sincerely,

Robert Schulz Associate Vice President, Real Estate, Planning & Development San Diego State University

Real Estate, Planning and Development Business and Financial Affairs San Diego State University 5500 Campanile Drive San Diego CA 92182-1620 Tel: 619 - 594-6012 Fax: 619 - 594-6022 Email: rschubz@mail.sdau.edu

Robert Schulz Associate Vice President SAN DIEGO STATE UNIVERSITY

December 20, 2016

Virgil Perez Jipay Nation of Santa Ysabel PO Box 130, Santa Ysabel, CA 92070

# Re: Notification of the Proposed SDSU New Student Housing Expansion Project Pursuant to California Assembly Bill 52.

Dear Virgil,

Pursuant to California Assembly Bill (AB) 52, San Diego State University (SDSU), as a representative of the Board of Trustees of the California State University, is providing you with notification of the SDSU New Student Housing Expansion Project (proposed project), located at SDSU in the City of San Diego, San Diego County, California. While SDSU has not yet received a request from your tribe to be notified of specific projects within a designated geographic area, we are reaching out to all groups listed on the California Native American Heritage Commission's Sacred Lands File consultation list in a good faith effort to provide notification of the proposed project to groups that are traditionally or culturally affiliated with the geographic area of the proposed project.

### **Project Location**

The campus is situated along Interstate 8 (I-8) about 10 miles from downtown San Diego (Figure 1, Regional Map, and Figure 2, Project Area Map). The proposed project would be located on a 7.84-acre site at the northwest corner of the main SDSU campus. The campus is part of the College Area Community of the City of San Diego. The proposed project is located in unsectioned land of Township 16 South, Range 2 West within the La Mesa 7.5-minute quadrangle, as mapped by the U.S. Geological Survey (Figure 3 Record Search Map).

#### **Project Description**

Sincerely,

Robert Schulz Associate Vice President, Real Estate, Planning & Development San Diego State University

Real Estate, Planning and Development Business and Financial Affairs San Diego State University 5500 Comparate Drive San Diego CA 92182-1620 Tel: 619 - 594-6017 Fax: 619 - 594-6022 Ermail: eschulzümeni,s360.edu

Robert Scholz Associate Vice President SAN DIEGO STATE UNIVERSITY

December 20, 2016

Clint Linton Iipay Nation of Santa Ysabel PO Box 507, Santa Ysabel, CA 92070

## Re: Notification of the Proposed SDSU New Student Housing Expansion Project Pursuant to California Assembly Bill 52.

Dear Clint,

Pursuant to California Assembly Bill (AB) 52, San Diego State University (SDSU), as a representative of the Board of Trustees of the California State University, is providing you with notification of the SDSU New Student Housing Expansion Project (proposed project), located at SDSU in the City of San Diego, San Diego County, California. While SDSU has not yet received a request from your tribe to be notified of specific projects within a designated geographic area, we are reaching out to all groups listed on the California Native American Heritage Commission's Sacred Lands File consultation list in a good faith effort to provide notification of the proposed project to groups that are traditionally or culturally affiliated with the geographic area of the proposed project.

### **Project Location**

The campus is situated along Interstate 8 (I-8) about 10 miles from downtown San Diego (Figure 1, Regional Map, and Figure 2, Project Area Map). The proposed project would be located on a 7.84-acre site at the northwest corner of the main SDSU campus. The campus is part of the College Area Community of the City of San Diego. The proposed project is located in unsectioned land of Township 16 South, Range 2 West within the La Mesa 7.5-minute quadrangle, as mapped by the U.S. Geological Survey (Figure 3 Record Search Map).

### **Project Description**

Sincerely,

Robert Schulz Associate Vice President, Real Estate, Planning & Development San Diego State University

Real Estate, Planning and Development Business and Financial Affairs San Diego State University 5500 Campanile Drive San Diego CA 92182-1620 Tel: 619 - 594-6017 Fax: 619 - 594 - 6022 Email: rschulz@muil.sdoa.edu

Robert Schulz Associate Vice President SAN DIEGO STATE UNIVERSITY

December 20, 2016

Robert Pinto Ewiiaapaayp Tribal Office 4054 Willows Rd, Alpine, CA 91901

# Re: Notification of the Proposed SDSU New Student Housing Expansion Project Pursuant to California Assembly Bill 52.

Dear Robert,

Pursuant to California Assembly Bill (AB) 52, San Diego State University (SDSU), as a representative of the Board of Trustees of the California State University, is providing you with notification of the SDSU New Student Housing Expansion Project (proposed project), located at SDSU in the City of San Diego, San Diego County, California. While SDSU has not yet received a request from your tribe to be notified of specific projects within a designated geographic area, we are reaching out to all groups listed on the California Native American Heritage Commission's Sacred Lands File consultation list in a good faith effort to provide notification of the proposed project to groups that are traditionally or culturally affiliated with the geographic area of the proposed project.

### **Project Location**

The campus is situated along Interstate 8 (I-8) about 10 miles from downtown San Diego (Figure 1, Regional Map, and Figure 2, Project Area Map). The proposed project would be located on a 7.84-acre site at the northwest corner of the main SDSU campus. The campus is part of the College Area Community of the City of San Diego. The proposed project is located in unsectioned land of Township 16 South, Range 2 West within the La Mesa 7.5-minute quadrangle, as mapped by the U.S. Geological Survey (Figure 3 Record Search Map).

### **Project Description**

Sincerely,

Robert Schulz Associate Vice President, Real Estate, Planning & Development San Diego State University

Real Estate, Planning and Development Business and Financial Affairs San Diego State University 5500 Campanile Drive San Diego CA 92182-1620 Tel: 619 - 594 - 6017 Fax: 619 - 594 - 6022 Email: rechulz@mail.adau.edu

Robert Sabula Associate Vice President SAN DIEGO STATE UNIVERSITY

December 20, 2016

Michael Garcia Ewiiaapaayp Tribal Office 4054 Willows Rd, Alpine, CA 91901

# Re: Notification of the Proposed SDSU New Student Housing Expansion Project Pursuant to California Assembly Bill 52.

Dear Michael,

Pursuant to California Assembly Bill (AB) 52, San Diego State University (SDSU), as a representative of the Board of Trustees of the California State University, is providing you with notification of the SDSU New Student Housing Expansion Project (proposed project), located at SDSU in the City of San Diego, San Diego County, California. While SDSU has not yet received a request from your tribe to be notified of specific projects within a designated geographic area, we are reaching out to all groups listed on the California Native American Heritage Commission's Sacred Lands File consultation list in a good faith effort to provide notification of the proposed project to groups that are traditionally or culturally affiliated with the geographic area of the proposed project.

### **Project Location**

The campus is situated along Interstate 8 (I-8) about 10 miles from downtown San Diego (Figure 1, Regional Map, and Figure 2, Project Area Map). The proposed project would be located on a 7.84-acre site at the northwest corner of the main SDSU campus. The campus is part of the College Area Community of the City of San Diego. The proposed project is located in unsectioned land of Township 16 South, Range 2 West within the La Mesa 7.5-minute quadrangle, as mapped by the U.S. Geological Survey (Figure 3 Record Search Map).

### **Project Description**

Sincerely,

Robert Schulz Associate Vice President, Real Estate, Planning & Development San Diego State University

Real Estate, Planning and Development Dusiness and Flumicial Affairs San Diego State University 5500 Campanile Drive San Diego CA 92182-1620 Tel: 619 - 594 - 6017 Fao: 619 - 594 - 6022 Email: tschulz@mail.sdsu.edu

Robert Schuiz Associate Via: President SAN DIEGO STATE UNIVERSITY

December 20, 2016

Ralph Goff Campo Band of Mission Indians 36190 Church Road, Suite 1 Campo, CA 91906

# Re: Notification of the Proposed SDSU New Student Housing Expansion Project Pursuant to California Assembly Bill 52.

Dear Ralph,

Pursuant to California Assembly Bill (AB) 52, San Diego State University (SDSU), as a representative of the Board of Trustees of the California State University, is providing you with notification of the SDSU New Student Housing Expansion Project (proposed project), located at SDSU in the City of San Diego, San Diego County, California. While SDSU has not yet received a request from your tribe to be notified of specific projects within a designated geographic area, we are reaching out to all groups listed on the California Native American Heritage Commission's Sacred Lands File consultation list in a good faith effort to provide notification of the proposed project to groups that are traditionally or culturally affiliated with the geographic area of the proposed project.

### **Project Location**

The campus is situated along Interstate 8 (I-8) about 10 miles from downtown San Diego (Figure 1, Regional Map, and Figure 2, Project Area Map). The proposed project would be located on a 7.84-acre site at the northwest corner of the main SDSU campus. The campus is part of the College Area Community of the City of San Diego. The proposed project is located in unsectioned land of Township 16 South, Range 2 West within the La Mesa 7,5-minute quadrangle, as mapped by the U.S. Geological Survey (Figure 3 Record Search Map).

#### **Project Description**

Sincerely,

Robert Schulz

Associate Vice President, Real Estate, Planning & Development San Diego State University

Attn: Figure 1. Regional Map Figure 2. Project Area Map Figure 3. Record Search Map

December 20, 2016

Gwendolyn Parada La Posat Band of Mission Indians 8 Crestwood Road, Boulevard, CA 91905

# Re: Notification of the Proposed SDSU New Student Housing Expansion Project Pursuant to California Assembly Bill 52.

Dear Gwendolyn,

Pursuant to California Assembly Bill (AB) 52, San Diego State University (SDSU), as a representative of the Board of Trustees of the California State University, is providing you with notification of the SDSU New Student Housing Expansion Project (proposed project), located at SDSU in the City of San Diego, San Diego County, California. While SDSU has not yet received a request from your tribe to be notified of specific projects within a designated geographic area, we are reaching out to all groups listed on the

Real Estate, Planning and Development Businese and Financial Affairs San Diego State University 5500 Campanile Drive San Diego CA 92182-1620 Tel: 610 - 594 - 6017 Fax: 619 - 594 - 6017 Fax: 619 - 594 - 6022 Email: scinulz@mail.scioi.edu

Robert Schulz Associate Vice President SAN DIEGO STATE UNIVERSITY

December 20, 2016

Clifford LaChappa Barona Group of the Capitan Grande 1095 Barona Road, Lakeside, CA 92040

# Re: Notification of the Proposed SDSU New Student Housing Expansion Project Pursuant to California Assembly Bill 52.

Dear Clifford,

Pursuant to California Assembly Bill (AB) 52, San Diego State University (SDSU), as a representative of the Board of Trustees of the California State University, is providing you with notification of the SDSU New Student Housing Expansion Project (proposed project), located at SDSU in the City of San Diego, San Diego County, California. While SDSU has not yet received a request from your tribe to be notified of specific projects within a designated geographic area, we are reaching out to all groups listed on the California Native American Heritage Commission's Sacred Lands File consultation list in a good faith effort to provide notification of the proposed project to groups that are traditionally or culturally affiliated with the geographic area of the proposed project.

#### **Project Location**

The campus is situated along Interstate S (I-8) about 10 miles from downtown San Diego (Figure 1, Regional Map, and Figure 2, Project Area Map). The proposed project would be located on a 7.84-acre site at the northwest corner of the main SDSU campus. The campus is part of the College Area Community of the City of San Diego. The proposed project is located in unsectioned land of Township 16 South, Range 2 West within the La Mesa 7.5-minute quadrangle, as mapped by the U.S. Geological Survey (Figure 3 Record Search Map).

### **Project Description**

Sincerely,

Robert Schulz Associate Vice President, Real Estate, Planning & Development San Diego State University

Real Estate, Planning and Development Business and Financial Affairs San Diego State University 5500 Campanile Drive San Diego CA 92182-1620 Tel: 619 - 594-6017 Fax: 619 - 594-6017 Fax: 619 - 594-6022 Email: rschutz@mail.sdsu.edu

Rubert Schulz Amociete Vice President SAN DIFGO STATE UNIVERSITY

December 20, 2016

Robert J Welch Viejas Band of Kurneyaay Indians 1 Viejas Grade Road, Alpine, CA 91901

## Re: Notification of the Proposed SDSU New Student Housing Expansion Project Pursuant to California Assembly Bill 52.

Dear Robert,

Pursuant to California Assembly Bill (AB) 52, San Diego State University (SDSU), as a representative of the Board of Trustees of the California State University, is providing you with notification of the SDSU New Student Housing Expansion Project (proposed project), located at SDSU in the City of San Diego, San Diego County, California. While SDSU has not yet received a request from your tribe to be notified of specific projects within a designated geographic area, we are reaching out to all groups listed on the California Native American Heritage Commission's Sacred Lands File consultation list in a good faith effort to provide notification of the proposed project to groups that are traditionally or culturally affiliated with the geographic area of the proposed project.

#### **Project Location**

The campus is situated along Interstate 8 (I-8) about 10 miles from downtown San Diego (Figure 1, Regional Map, and Figure 2, Project Area Map). The proposed project would be located on a 7.84-acre site at the northwest corner of the main SDSU campus. The campus is part of the College Area Community of the City of San Diego. The proposed project is located in unsectioned land of Township 16 South, Range 2 West within the La Mesa 7.5-minute quadrangle, as mapped by the U.S. Geological Survey (Figure 3 Record Search Map).

# **Project Description**

Sincerely,

Robert Schulz Associate Vice President, Real Estate, Planning & Development San Diego State University

Sincerely,

Robert Schulz Associate Vice President, Real Estate, Planning & Development San Diego State University

Real Estate, Planning and Development Business and Financial Affairs San Diego State University 5500 Campanile Drive San Diego CA 92182-1620 Tel: 619 - 594-6017 Fax: 619 - 594 - 6017 Fax: 619 - 594 - 6022 Email: weindbeitmilladsar.edu

Robert Schulz Associate Vice President



December 20, 2016

Angela Elliott Santos Manzanita Band of Kumeyaay Nation PO Box 1302, Boulevard, CA 91905

# Re: Notification of the Proposed SDSU New Student Housing Expansion Project Pursuant to California Assembly Bill 52.

Dear Angela,

Pursuant to California Assembly Bill (AB) 52, San Diego State University (SDSU), as a representative of the Board of Trustees of the California State University, is providing you with notification of the SDSU New Student Housing Expansion Project (proposed project), located at SDSU in the City of San Diego, San Diego County, California. While SDSU has not yet received a request from your tribe to be notified of specific projects within a designated geographic area, we are reaching out to all groups listed on the California Native American Heritage Commission's Sacred Lands File consultation list in a good faith effort to provide notification of the proposed project to groups that are traditionally or culturally affiliated with the geographic area of the proposed project.

#### **Project Location**

The campus is situated along Interstate 8 (1-8) about 10 miles from downtown San Diego (Figure 1, Regional Map, and Figure 2, Project Area Map). The proposed project would be located on a 7.84-acre site at the northwest corner of the main SDSU campus. The campus is part of the College Area Community of the City of San Diego. The proposed project is located in unsectioned land of Township 16 South, Range 2 West within the La Mesa 7.5-minute quadrangle, as mapped by the U.S. Geological Survey (Figure 3 Record Search Map).

### **Project Description**

Sincerely,

Robert Schulz Associate Vice President, Real Estate, Planning & Development San Diego State University