

4.4 CULTURAL RESOURCES

4.4.1 INTRODUCTION

This section describes the existing cultural resources of the project site, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed SDSU New Student Housing Project (proposed project). Information used throughout this chapter is primarily based on the Cultural Resources Technical Report for the proposed project, prepared by Dudek, and is included as **Appendix E** to this EIR.

4.4.2 METHODOLOGY

This section was developed by reviewing the Cultural Resources Technical Report (**Appendix E**). The Cultural Resources Technical Report was prepared by Dudek staff, who conducted a records search of files obtained from South Coastal Information Center (SCIC) for the project area and a surrounding mile buffer in 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/CRHR and listed OHP Archaeological Determinations of Eligibility, California Points of Historical Interest, California Historical Landmarks, and Caltrans Bridge Survey information. 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 including a 1-mile buffer. Coupled with the desktop research for the proposed project, the paleontological records search identified paleontologically sensitive geological units within the proposed project area.

Dudek archaeologist Matthew DeCarlo conducted an intensive pedestrian cultural survey of the proposed project area on January 4, 2017. The archaeological survey exceeded the applicable

Secretary of Interior Professional Qualifications Standards for archaeological surveys 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.

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 one 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 4.6**. 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 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.

4.4.3 EXISTING CONDITIONS.

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.

4.4.3.1 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.

4.4.3.2 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 San Diego Natural

History Museum 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 earthmoving 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).

4.4.3.3 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 San Diego Natural History Museum (McComas 2016).

4.4.3.4 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 Linda Vista 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 Qpov₇), 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 2016; McComas 2016).

4.4.4 RELEVANT PLANS, POLICIES, AND ORDINANCES

Federal

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 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.

The NHPA Amendments:

In 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 Register
- 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.

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.

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.

State

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 preservation-in-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:

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 §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, 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. (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 resources, 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.

(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 state 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 Public Resources Code Section 5097.98 (California Code of Regulations, Title 14; Chapter 3; Article 5; Section 15064.5(e)).

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]). 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.

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 consider 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.

4.4.5 THRESHOLDS OF SIGNIFICANCE

The significance criteria used to evaluate the project impacts to cultural resources are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, 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. Would the project result in a cumulatively 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.

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(a) 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:

1. 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 4.4.4 Relevant Plans, Policies and Ordinances, 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.

4.4.6 IMPACTS ANALYSIS

Following the issuance of the Notice of Preparation (NOP) for the proposed project, CSU/SDSU received multiple comment letters from public and private entities regarding cultural resources. Comments included a recommendation of consultation with all applicable California Native American Tribes per AB52 and SB18, as well as the preparation of a cultural resources assessment included in the DEIR. Commenters also recommended the project include Tribal Cultural Resources in the CEQA analysis. The analysis presented below addresses each of these topics.

Would the project cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5?

Phases I, II, and III

No archaeological or historical 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. Should construction or other personnel encounter any historical, archaeological or Native American cultural material within the project area the project might result in a significant impact, therefore mitigation is provided (see MM-CUL-1 in Section 4.4.5, Mitigation Measures).

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

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 might result in a significant impact, therefore mitigation is provided (see MM-CUL-1 in Section 4.5.5, Mitigation Measures).

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

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. Following the recommendations of the San Diego Natural History Museum, a paleontological mitigation program to reduce any potential impacts to significant paleontological resources to a less than significant level should be implemented (see MM-CUL-2 in Section 4.4.5, 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 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 were exposed on the jobsite. Such impacts could be significant (see Mitigation Measure MM-CUL-2).

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.

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

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. 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 might result in a significant impact, therefore contingent mitigation is provided (see MM-CUL-3 in Section 4.4.5, Mitigation Measures).

Operational/permanent activities related to the project will not have a direct or indirect 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 once the proposed residences are occupied Mitigation Measure CUL-3 will ensure that impacts to these undocumented remains remain below a level of significance (see MM-CUL-3 in Section 4.4.5, Mitigation Measures).

Would the project result in a cumulatively significant 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 and monitoring programs to ensure that construction work is halted if significant 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.

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.

4.4.7 MITIGATION MEASURES

The following Mitigation Measures 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, 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 non-significant 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, California State University/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.

The project site should be secured with construction fencing and locked gates to prevent access to work areas where paleontological resources might be exposed. The proper placement of Best Management Practices to minimize soil erosion would also reduce the potential for impacts to paleontological resources.

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.

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 consultation with the Most Likely Descendant regarding their recommendations as required by California Public Resources Code Section 5097.98 has been conducted. Public Resources Code Section 5097.98, CEQA Section 15064.5 and Health & Safety Code Section 7050.5 shall be followed.

4.4.8 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 might 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.

4.4.9 REFERENCES

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 Robert 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 Alfred 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. 2016. California Environmental Quality Act, Significance Determination Thresholds. Development Services Department, 84 p.

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 Walsh, S.L. 1993. *Paleontological Resources, County of San Diego*. Prepared for the San Diego Planning Commission: 1-68.

Fages, P. 1937. *A Historical, Political, and Natural Description of California (1775)*. Translated by Herbert Ingram 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.

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. California Geological Survey, Regional Geologic Map Series 1:100,000 scale, map no. 3.
- 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>

- Luomala, K. 1978. "Tipai and Ipai." In *California*, edited by Robert F. Heizer, 592-609. *Handbook of the North American Indians*, Vol. 8, William 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. Dated: 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 Prehistory." *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. 11 p. Available; <http://vertpaleo.org/PDFS/68/68c554bb-86f1-442f-a0dc-25299762d36c.pdf>.
- 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., 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.

INTENTIONALLY LEFT BLANK