

August 23, 2022

13937

Matt McGlashan
Mill Creek Residential Trust
949 South Coast Drive, Suite 400
Costa Mesa, CA 92626

Subject: Cultural Resources Inventory Report for the Modera Melrose Project, Oceanside, California

Dear Mr. McGlashan:

The following letter report summarizes the cultural resources Phase I inventory conducted for the Modera Melrose Project (Project), located in Oceanside, California (Figure 1). The Project would consist of the construction of 323-unit residential project located at the southeast corner of Melrose Drive and West Bobier Drive. These cultural resources investigation was conducted in accordance with the California Environmental Quality Act (CEQA) and the City of Oceanside Guidelines for historical resources. The City of Oceanside (City) is the CEQA Lead Agency for the Project. In accordance with CEQA, Dudek performed a Phase I cultural resources inventory for the entire area of potential effect (APE). The Project APE consists of an approximately 7.4-acre property covering two parcels (APNs 161-030-23-00 and 161-030-24) (Figure 2).

CEQA refers to sequential stages of cultural resources investigation, including Inventory, Evaluation, and Mitigation. Phase I (Inventory), Phase II (Evaluation), and Phase III (Mitigation) are vernacular terms used in the cultural resources industry. For the purposes of this report, Phase I is defined as an Inventory and includes archival research for archaeological resources and Tribal Cultural Resources (TCR), pedestrian surveys, and other inventory methods.

Brian F. Smith and Associates, Inc. (BFS) conducted a cultural resources Due Diligence Study for the entire Project APE in 2021 (Smith 2021). The study is summarized herein in this letter report.

A records search was conducted by Dudek at the South Coastal Information Center (SCIC) for the proposed Project APE and a one-mile radius search buffer around the Project APE. The records search identified a portion of CA-SDI-5345 recorded within the northeastern portion of the Project APE. A total of 21 cultural resources were identified within the one-mile radius search buffer. A Native American Heritage Commission (NAHC) Sacred Lands File SLF search indicated positive results of Native American cultural resources within the Project area. Outreach letters were mailed to all Native American group representatives included on the NAHC contact list and four responses have been received to date. Through the outreach effort, it was determined that the Project APE is located in close proximity to culturally sensitive areas, such as village sites and ceremonial sites. An intensive pedestrian survey of the Project APE did not identify any archaeological or built environment resources. Dudek also did not relocate CA-SDI-5345 during the pedestrian survey. The Project APE has been disturbed by previous grading activities.

The portion of CA-SDI-5345 within the Project APE has been destroyed. The site is not a significant archaeological resource under CEQA, however, due to the proximity of culturally sensitive areas, number of cultural resources

identified within one-mile of the Project APE, and proximity to a drainage, there is potential for subsurface cultural resources, therefore, it is recommended that a qualified archaeologist and a Traditionally and Culturally Affiliated (TCA) Native American Monitor representing a TCA Luiseño Tribe are present during all ground-disturbing activities.

1 Project Description and Location

The Project APE is located at the southeast corner of Melrose Drive and West Bobier Drive in the City of Oceanside, California in northwest San Diego County. The Project site falls within Section 13 of Township 11 South, Range 4 West, 3 West of the San Luis Rey, California 7.5-minute U.S. Geological Survey Topographic Quadrangle Map (Figure 1). The proposed Project consists of the construction of a 323-unit residential project. The proposed residential development would include 33 affordable/low-income units and 290 market rate units ranging from 666 square feet to 1,429 square feet. Access is proposed from West Bobier Drive and the northeastern corner of the project site. In the event of an emergency, adequate emergency access would be provided via the entrance on West Bobier Drive. Additionally, the development would include 526 parking spaces for residences and guests. The project development would include six buildings, five of which would be four- to five-story residential buildings, and one of which would be a four-story mixed-use building that would include commercial uses on the ground level and three residential levels. The proposed residential units would include one, two, or three bedrooms, living areas, and garage spaces for select units. The APE for the project consists of the consists of an approximately 7.4-acre property covering two parcels (APNs 161-030-23-00 and 161-030-24) (Figure 2).

2 Regulatory Framework

The City is the Lead Agency for compliance with the CEQA. This study is compliant with cultural resource regulations that apply to the Project APE including provisions for the California Register of Historic Resources (CRHR), Native American Historic Cultural Sites (California Public Resources Code section 5097 et seq.), the California Native American Graves Protection and Repatriation Act, CEQA, California Health and Safety Code section 7050.5, Assembly Bill Number 52, and the City's Guidelines.

2.1 The California Register of Historic Resources (Public Resources Code section 5020 et seq.)

Under CEQA, the term "historical resource" includes but is not limited to "any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California" (California Public Resources Code section 5020.1(j)). In 1992, the California legislature established CRHR "to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (California Public Resources Code section 5024.1(a)). 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 National Register of Historic Places (NRHP) criteria:

- Associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.

- Associated with the lives of persons important in our past.
- 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.
- Has yielded, or may be likely to yield, information important in prehistory or history.

(California Public Resources Code section 5024.1(c).) Resources less than 50 years old are not considered for listing in the CRHR, but may be considered if it can be demonstrated that sufficient time has passed to understand the historical importance of the resource (see 14 CCR, section 4852(d)(2)).

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

2.2 Native American Historic Cultural Sites (California Public Resources Code section 5097 et seq.)

State law addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and establishes the NRHC to resolve disputes regarding the disposition of such remains. In addition, the Native American Historic Resource Protection Act makes it a misdemeanor punishable by up to 1 year in jail to deface or destroy an Indian historic or cultural site that is listed or may be eligible for listing in the CRHR.

2.3 California Native American Graves Protection and Repatriation Act

The California Native American Graves Protection and Repatriation Act (California Repatriation Act), enacted in 2001, required all state agencies and museums that receive state funding and that have possession or control over collections of human remains or cultural items, as defined, to complete an inventory and summary of these remains and items on or before January 1, 2003, with certain exceptions. The California Repatriation Act also provides a process for the identification and repatriation of these items to the appropriate tribes.

2.4 California Environmental Quality Act

As described further below, the following CEQA statutes and CEQA Guidelines are of relevance 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): Define 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 5097.98 and CEQA Guidelines section 15064.5(e): Set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated ceremony.
4. California Public Resources Code sections 21083.2(b)-(c) and CEQA Guidelines section 15126.4: Provide information regarding the mitigation framework for archaeological and historic resources, including options of preservation-in-place mitigation measures; preservation-in-place is the preferred manner of mitigating impacts to significant archaeological sites because it maintains the relationship between artifacts and the archaeological context, and may also help avoid conflict with religious or cultural values of groups associated with the archaeological site(s).

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)). If a site is either listed or eligible for listing in the CRHR, or if it is included in a local register of historic resources, or identified as significant in a historical resources survey (meeting the requirements of California Public Resources Code section 5024.1(q)), it is a “historical resource” and is 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 “substantial adverse change in the significance of an historical resource” reflecting a significant effect under CEQA means “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired” (CEQA Guidelines section 15064.5(b)(1); 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.

2.5 California Health and Safety Code section 7050.5

CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. As described below, these procedures are detailed in California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98.

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. Health and Safety Code section

7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the County coroner has examined the remains (California Health and Safety Code Section 7050.5[b]). If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact the NAHC within 24 hours (California Health and Safety Code Section 7050.5[c]). In accordance with California Public Resources Code Section 5097.98(a), the NAHC will notify the Most Likely Descendant (MLD). With the permission of the landowner, the MLD may inspect the site of discovery. Within 48 hours of being granted access to the site, the MLD may recommend means of treatment or disposition, with appropriate dignity, of the human remains and associated grave goods.

2.6 Assembly Bill 52

California Assembly Bill 52, which took effect July 1, 2015, establishes a consultation process between California Native American Tribes and lead agencies in order to address tribal concerns regarding project impacts and mitigation to “tribal cultural resources” (TCR). Public Resources Code section 21074(a) defines TCRs and states that a project that has the potential to cause a substantial adverse change to a TCR is a project that may have an adverse effect on the environment. A TCR is defined as a site, feature, place, cultural landscape, sacred place, and object with cultural value to a California Native American tribe that is either:

1. listed or eligible for listing in the CRHR or a local register of historical resources, or
2. determined by a lead agency to be a TCR.

2.7 City of Oceanside Guidelines

Chapter 14A of the City of Oceanside Municipal Code, referred to as the Historical Preservation Ordinance, identifies evaluation criteria under which a historical site or area may be designated (City of Oceanside 2017: Section 14A.6, Ordinance No. 82-14, Section 1, 9-8-82):

- a) It exemplifies or reflects special elements of the city’s cultural, social, economic, political, aesthetic, engineering, or architectural history; or
- b) It is identified with persons or events significant in local, state, or national history; or
- c) It 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; or
- d) It is representative of the notable work of a builder, designer, or architect; or
- e) It is found by the council to have significant characteristics which should come under the protection of this chapter.

3 Project Background

3.1 Current Conditions

The approximately 7.4-acre APE is currently a disturbed, vacant property with no existing structures. The proposed Project APE has never been developed but the general level of previous ground disturbance is high, as noted by evidence of mowing/disking, grading, various dirt berms, and construction waste dumping piles. The Project APE has a discernable south-facing slope, with the lowest elevation along the southern edge of the Project APE. There are multiple large granite bedrock boulders located in the remains of a natural seasonal drainage along the south-central edge of the Project APE, all heavily exfoliated and damaged on outer surfaces. Vegetation within the Project APE includes primarily non-native grasslands and disturbed areas. Ornamental plantings occur along the southeastern edge of the site, bordering an existing residential development, and small isolated patches of coastal sage scrub exist in the western and northwestern portions of the Project APE.

The Project APE is underlain by weathered plutonic igneous rocks mapped as the Cretaceous-age Bonsall Tonalite, overlain by sedimentary rocks of the Eocene-age Santiago Formation (Deméré and Siren 2013). Soils consist of Diablo clay, 2 to 9 percent slopes within the northwestern corner and eastern section of the Project APE, and Tujunga Sand, 0 to 5 percent slopes throughout the rest of the Project APE (USDA 2022).

3.2 Prehistoric Context

Evidence for continuous human occupation in Southern California spans the last 10,000 years. Various attempts to parse out variability in archaeological assemblages over this broad period 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. However, given the direction of research and differential timing of archaeological study following intensive development in Riverside County, chronology building in the Inland Empire must rely on data from neighboring regions to fill the gaps. To be more inclusive, this research employs a common set of generalized terms used to describe chronological trends in assemblage composition: Paleoindian (before 7500 years ago), Archaic (10,000 – 1500 years ago), Late Prehistoric (1500 BP¹– AD 1769), and Ethnohistoric (after AD 1769).

3.2.1 Paleoindian Period (before 7500 years ago)

Evidence for Paleoindian occupation in the region is tenuous. Our knowledge of associated cultural pattern(s) is informed by a relatively sparse body of data that has been collected from within an area extending from coastal San Diego, through the Mojave Desert, and beyond. A very unique technology defined by fluted projectile points and a highly formal lithic tool kit with almost no processing equipment is often considered to be the earliest evidence of human adaptation to North America. Widely known as “Clovis,” regional manifestations of this toolkit show important variability both in projectile point style and tool kit composition. Importantly, the attributes of “Clovis” are uncommon in California, with very few examples of the diagnostic, “fluted” Clovis point. There is however, a notable exception from Crystal Cove State Park in southern Orange County (Fitzgerald and Rondeau 2012). This, along with

¹ “BP” indicates calibrated, calendar years before present (specifically, prior to AD 1950). Ages presented herein have been calibrated from the original age estimates wherever possible; ranges of general phenomena (e.g. cultural periods are approximate).

other potential attributes of Clovis culture along the California Coast remain undated, and most of the earliest well-dated sites from the region contain rather different archaeological assemblages (Erlandson et al. 2007).

While the earliest evidence for human activity in California comes from the Channel Islands, ca. 13,000 BP, it does not exhibit obvious cultural similarity with the Clovis phenomenon. However, in the southern Central Valley fluted Clovis points date from ca. 11,000–10,500 BP (Rogers and Yohe 2020). One of the earliest dated archaeological assemblages in coastal Southern California (excluding the Channel Islands) comes from SDI-4669/W-12 in La Jolla, with human remains dating to ca. 9900–9050 BP (Bada et al. 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 ground stone, battered cobbles, and expedient flake tools) (Kennedy 1983). 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 ground stone tools. Prime examples of this pattern come from Naval Air Weapons Station China Lake near Ridgecrest (Davis 1978). These sites contained fluted and unfluted stemmed points and large numbers of formal flake tools (e.g., shaped scrapers, blades). Fluted points from SBR-2355 and SBR-2356, also in the Mojave Desert, are considered quite ancient (on the thickness of obsidian hydration rinds) and co-occur with a diverse assemblage that also contains stemmed points, typically attributed to the Lake Mojave archaeological culture. Other typical Paleoindian sites in the desert include the Komodo site (MNO-679)—a multi-component fluted point site, and MNO-680—a single component Great Basined Stemmed point site (Basgall 1987, 1988; Basgall et al. 2002). At MNO-679 and -680, ground stone 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 image of Paleoindians as highly mobile big-game hunters. 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 (before 7500 BP) that submerged as much as 16 kilometers of the San Diego coastline since people first arrived in California, ca. 13,000 years ago (ICF 2013). 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, contain stemmed points similar in form and age to Silver Lake and Lake Mojave projectile points from the high desert (Basgall and Hall 1993; Warren et al. 2004). However, sites of this nature are extremely rare; more typical are sites that contain large numbers of milling tools intermingled with older projectile point forms. Separating cultural components on the basis of artifact form and frequency is therefore difficult.

Warren et al. (2004) claim that a biface manufacturing tradition at the Harris site complex (SDI-149) is representative of typical Paleoindian occupation in the San Diego region that possibly dates between ca. 11,200 and 8200 BP (on the basis of radiocarbon dates from the Harris site itself). Termed San Dieguito (also see 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 well-made bifaces (including projectile points), formal flake tools, a biface reduction trajectory, and relatively small amounts of processing tools (also see Warren 1964; Warren 1968). Despite the unique assemblage composition, the definition of San Dieguito as a separate cultural tradition is hotly debated. Gallegos (1987, 2017) suggested that the San Dieguito pattern is simply the inland manifestation of a broader economic pattern. This 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 on tool manufacture. Such a strategy contrasts with the expedient flake-based tools and cobble-core reduction strategy that typifies the regional Archaic sites (see below). It can be inferred from the uniquely high degree of San Dieguito assemblage formality that the Harris site complex represents an economic strategy distinct from that represented by other roughly contemporaneous assemblages from throughout the region.

San Dieguito sites are rare in the inland valleys, with one possible candidate, RIV-2798/H, located on the shore of Lake Elsinore. Excavations at Locus B at RIV-2798/H produced a toolkit consisting predominately of flaked stone tools, including crescents, points, and bifaces, and lesser amounts of groundstone tools, among other items (Grenda 1997). A calibrated and reservoir-corrected radiocarbon date on a shell from this site points to an early occupation, ca. 8880–8525 BP. Grenda suggested this site represents seasonal exploitation of lacustrine resources and small game and resembles coastal San Dieguito assemblages and spatial patterning.

If the San Dieguito pattern truly represents a socioeconomic strategy distinct from the regional 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, where hunting-related tools were replaced by processing tools during the early Holocene (Basgall and Hall 1990).

2.2.2 Archaic Period (10,000 – 1500 years ago)

The more than 2,500-year overlap between the presumed age of Paleoindian occupations and the Archaic period highlights the difficulty in defining a cultural chronology in Southern California. If San Dieguito is the only recognized Paleoindian component in the coastal Southern California, 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 region (see Hale 2001, 2009).

The Archaic pattern, which has also been termed the Millingstone Horizon (among other things), is relatively easy to define with assemblages that consist primarily of processing tools, such as millingstones, handstones, battered cobbles, heavy crude scrapers, incipient flake-based tools, and cobble-core reduction. These assemblages occur in all environments across the region with little variability in tool composition. Low assemblage variability over time and space among Archaic sites has been equated with cultural conservatism (Basgall and Hall 1990; Byrd and Reddy 2002; Warren 1968; Warren et al. 2004). Despite enormous amounts of archaeological work at Archaic sites, little change in assemblage composition occurred until the bow and arrow, and then ceramics, were adopted after 1500 BP (Griset 1996; Hale 2009; Schaefer 2012). Even then, assemblage formality remained low. After the bow was 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 decreased in proportion relative to expedient, unshaped ground stone 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, complemented only by the addition of the bow and ceramics.

2.2.3 Late Prehistoric Period (1500 BP-AD 1769)

The period of time following the Archaic and before Ethnohistoric times (AD 1769) is commonly referred to as the Late Prehistoric (McDonald and Eighmey 2004; Rogers 1945; Wallace 1955); however, several other subdivisions continue to be used to describe various shifts in assemblage composition. In general, this period is defined by the addition of arrow points and ceramics, as well as the widespread use of bedrock mortars. 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, as well as ceramics, and cremations. The appearance of mortars and pestles is difficult to place in time because most mortars are on bedrock surfaces. Some argue that the Ethnohistoric intensive acorn economy extends as far back as 1500 BP (Bean and Shipek 1978). However, there is no substantial evidence that reliance on acorns, and the accompanying use of mortars and pestles, occurred before 600 BP. In Riverside County and the surrounding region, millingstones and handstones persisted in higher frequencies than mortars and pestles until the last 500 years (Basgall and Hall 1990); even then, weighing the economic significance of millingstone-handstone versus mortar-pestle technology is tenuous due to incomplete information on archaeological assemblages.

2.2.4 Ethnohistory

The proposed Project site lies within an area considered ancestral to the Luiseño.

Luiseño

The Luiseño language belongs to the Cupan group of the Takic language branch of the Uto-Aztecan language family. Luiseño is a term given to Native Americans under the administration of Mission San Luis Rey, and later applied specifically to the Payomkawichum ethnic nation who were present in the region where the mission was founded. Meaning the “western people,” the name Payomkawichum can also be applied to the closely related coastal Luiseño who lived north of the mission.

Luiseño territory was situated in the north half of San Diego County and the western edge of Riverside County. Their lands encompassed the southern Santa Margarita Mountains and the Palomar Mountains, and their foothills to the Pacific Ocean. The territory extended eastward into the San Jacinto Valley and the western foothills of the San Jacinto Mountains. Their neighbors to the west were the Juaneño (Acjachemen) who spoke a Luiseño dialect; the Cahuilla and Cupeño to the east who spoke other Takic Cupan languages; and the Ipai (Kumeyaay) to the south who spoke a California-Delta Yuman language.

The Luiseño resided in permanent villages and associated seasonal camps. Village population ranged from 50–400 with social structure based on lineages and clans. A single lineage was generally represented in smaller villages, while multiple lineages and a dominant clan presided in larger villages. Each clan/village owned a resource territory and was politically independent, yet maintained ties to others through economic, religious, and social networks in the immediate region. There were contact period villages in the vicinity of this segment, near the towns of Vista, San Marcos, and Escondido, but researchers have been unable to place rancheria names from the mission registers with these locations.

Like other Indigenous California groups, the primary food staple was the acorn (Bean and Shipek 1978), supplemented by other plant resources, fish, shellfish, waterfowl, and marine and terrestrial mammals. Villages were situated near reliable sources of water, needed for the daily leaching of milled acorn flour. Other plant foods

included pine nuts and grass seeds, manzanita, sunflower, sage, chia, lemonade berry, wild rose, holly-leaf cherry, prickly pear, and lamb's quarter. Large and small prey included deer, antelope, rabbit, jackrabbit, wood rat, mice, and ground squirrel, as well as quail, ducks, and other birds. Fish, such as trout, were caught in rivers and creeks.

The first direct European contact with the Luiseño occurred in July 1769 with the Spanish expedition led by Gaspar de Portolá. During the next six years, eight missions and forts were founded north and south of Luiseño territory. In 1776, Mission San Juan Capistrano was founded less than 10 miles north, and the populations of five northern Luiseño villages had been halved within 15 years. In 1798, Mission San Luis Rey was established within Luiseño territory, and the proselytizing among the Payomkawichum began in earnest.

Several Luiseño leaders signed the statewide 1852 treaty, locally known as the Treaty of Temecula (an interior Luiseño village), but the U.S. Congress never ratified it. By 1875, however, reservations for the Luiseño were established in the Palomar Mountains and nearby valleys, including Pala, Pauma, Rincon, Pechanga, and La Jolla.

San Luis Rey

Rio San Luis Rey de Francia was the name given by the Franciscan Friars to what is now known as the San Luis Rey River, and the mission of San Luis Rey de Francia was established in 1798, four miles up the San Luis Rey River (Sparkman 1908). Approximately 20 miles up the San Luis Rey River was the mission of Pala, established in 1816 as an outpost of San Luis Rey de Francia (Sparkman 1908). The Mission San Luis Rey is located approximately 3.5 miles northwest of the proposed Project APE.

Luiseño geographical names are very numerous; small tracts with distinguishing features may be named, or there may be a name for a small portion of a tract, or names for a large tract of country (Sparkman 1908). Each band had its tract in the San Luis Rey valley (Sparkman 1908). Some geographical names may be descriptive and some names are of old village sites noted to be located near modern localities and settlements; for example Keish is associated with San Luis Rey (Sparkman 1908). Kroeber has also noted several villages along the San Luis Rey River; Ikaimai was also noted to be located near Mission San Luis Rey near Keish (Kroeber 1925). Located to the east from the Mission San Luis Rey were Wiasamai and Wahaumai, continuing east from the Mission San Luis Rey is Kwalam (Opila), Tomkav, and Pala, and Wiawio was noted to be located at the west coast of the San Luis Rey River (Kroeber 1925).

4 Methods

4.1 Records Search

Previous Studies

Dudek conducted a records search at the SCIC for the Project APE and a one-mile radius buffer around the Project on March 16, 2022 (Confidential Appendix A). The records search results indicate that 79 previous cultural resources studies have been conducted within one-mile of the Project APE. Of the 79 studies, eight studies intersect the Project APE and are listed in Table 1 below. These studies include two archaeological testing programs, four cultural resources survey reports, one archaeological evaluation report, and one archaeological investigation report. Additionally, a Due Diligence Study prepared for the Project by BFSa (Smith 2021) in 2021 was provided to Dudek

(Confidential Appendix A). Based on the previous studies, the entire APE has been studied. The studies not listed in Table 1 are included in Confidential Appendix A.

Table 1. Reports Intersecting the Project APE

Report Number	Date	Authors	Title
SD-00503	1978	Paul G. Chace	Archaeological Test Excavations at SDI-5345, the Church Site, City of Vista.
SD-01090	1979	Westec Services, Inc.	Archaeological Investigation of the Colluci Property, Oceanside, California
SD-11228	1987	Marben-Laird Associates	Historic Resource Survey, A Project of the City of Vista, California
SD-11524	2007	Brian F. Smith and Associates	A Cultural Resources Evaluation for the Vista and Buena Sanitation District 2007 Sewer Master Plan Update
SD-11563	2008	ASM Affiliates, Inc.	Archaeological Resources Survey of the Melrose Station Market, Oceanside, San Diego County, California
SD-11742	2008	Gatlin Development Company	Archaeological Resources Survey, Bobier Property (APN 161-030-07), Vista, San Diego County, California
SD-14069	2011	ASM Affiliates, Inc.	Cultural and Historical Resource Study for the City of Oceanside General Plan- Circulation Element Update Program Environmental Impact Report
SD-14122	2013	Affinis	Cultural Resources Survey and Assessment, Vista Ridge Apartments, Vista, San Diego County, California
N/A	2021	Brian F. Smith and Associates	Results of a Cultural Resources Due Diligence Study for the Modera Melrose Project (APNs 161-030-07, -23, and -24), Cities of Oceanside and Vista, San Diego County, California

Smith 2021

BFSA completed a Due Diligence Study for the current Project APE in 2021. The study included a review of SCIC records and previous studies, NAHC SLF files, and a reconnaissance survey of the APE. A portion of CA-SDI-5345 is recorded within the eastern portion of the Project APE. Eight additional sites CA-SDI-6088, CA-SDI-6089, CA-SDI-6090, CA-SDI-6091, CA-SDI-6092, CA-SDI-6093, CA-SDI-8241, and SDI-11630 are located to the north and northeast of the Project APE. CA-SDI-5345 was originally recorded as consisting of bedrock milling features and a partially disturbed surface scatter of prehistoric habitation debris in 1975 by B. Underwood. Paul Chace conducted test excavations in 1978 and determined that a majority of CA-SDI-5345 was destroyed by grading activities. BFSA conducted a survey of the Project APE on February 11, 2021 and noted that the property was impacted by previous agricultural uses, some grading activity, a block retaining wall, entry gate, and driveway at the northeast portion of the Project APE. BFSA relocated two bedrock milling features were within the eastern portion of the Project APE. No artifacts or additional features associated with CA-SDI-5345 were identified and no additional archaeological sites were identified within the Project APE. While a majority of CA-SDI-5345 was previously destroyed, there is still

potential for inadvertent archaeological discoveries, and archaeological and Native American monitoring would likely be required by the City of Oceanside.

SD-00503

Paul G. Chace & Associates conducted a testing program at CA-SDI-5345 in 1978. Five 5-ft x 5-ft square subsurface test units were excavated and placed within a five-foot grid system over the entire project area, and a series of soil auger tests were performed with a manual 10-inch diameter bucket augur. The units were excavated in six-inch horizontal levels. There was very little prehistoric cultural material recovered from the site. In total, only 24 pieces of prehistoric material were recovered and consisted of one flaked core, one wedge-shaped piece of limestone, one milling basin fragment, one cobble, and 20 flakes of stone debitage. Modern trash was encountered in large quantities during the excavation of the test units. This demonstrated that the soil deposit was highly disturbed and that the site lacked integrity of association to distinguish between the prehistoric and modern material in the deposit. The testing program concluded that the archaeological resources at CA-SDI-5345 are limited and lack integrity of setting and association, that it can be included that CA-SDI-5345 will not yield information important in prehistory. CA-SDI-5345 is not eligible for the National Register of Historic Places. It is proposed that no further mitigation measures are necessary to mitigate any impacts against the site. The maps in the report do not indicate the site boundaries, however, the mapping on the USGS map with the site record shows it extending on both the north and south side of Bobier Drive.

SD-11742

Affinis conducted a cultural resources survey in 2008 of the Bobier Property (APN 161-030-07) located immediate adjacent and to the east of the proposed Project APE. CA-SDI-5345 is located within the Bobier Property and was previously tested by Paul G. Chace & Associates in 1978. During the survey, two bedrock milling features were noted, as well as two marine shells and a piece of metavolcanic angular waste. The survey did not contradict the previous assessment concluded by Chace in which CA-SDI-5345 was determined not to be a significant resource. Impacts to CA-SDI-5345 would not constitute a significant environmental effect. CA-SDI-5345 does not meet the criteria for listing on the California Register, nor would it be considered a historic property. However, due to the proximity of cultural sensitive areas such as the Luiseño village of Guajome, there is potential for subsurface cultural resources and an archaeological monitoring program was recommended.

SD-11563

ASM conducted a survey for the Melrose Station Market Project in 2007. This survey covers the proposed Project APE. One prehistoric milling feature was noted in the northeastern corner of the project area, within the approximate area where CA-SDI-5345 was mapped. The feature consists of a partial milling slick surface on an approximately 70 cm x 60 cm x 70 cm granite boulder. The slick is situated on a vertical angle, therefore, it is clear the feature is not in its original location and was likely moved to its current position during past construction and development. In addition, a marine shell fragment (*sp. Argopecten aequisulcatus*) was identified less than 5 meters from the eastern boundary fence adjacent to the location of CA-SDI-5345. The fragment was located on the surface and not in association with any midden soils. Three exploratory shovel tests pits were excavated during the survey immediately adjacent to the location where the shell was discovered. Within 20 cm below the surface, a modern ceramic fragment was recovered. The ceramic was decorated with a scallop shell set in epoxy resin. The scallop shell from the ceramic fragment is the same type of shell noted on the surface, therefore, the surface shell fragment is likely modern in origin. In addition, three backhoe trenches approximately 25 feet long, 2.5 to 3 feet deep, located

approximately 5 feet apart, were excavated. No evidence of any buried cultural materials were found the trench excavations. While one prehistoric milling feature was identified, the feature is not in its original location. No other evidence for CA-SDI-5345 or any other prehistoric archaeological site was found during the survey and trenching and monitoring was not recommended.

SD-14122

Affinis conducted a survey and testing program of CA-SDI-5345 in 2012 for the Vista Ridge Apartments. Testing included documentation of the bedrock milling feature and 12 shovel test pits measuring 50 cm x 30 cm and excavated in 10 cm levels. CA-SDI-5345 was recorded immediately south of the Vista Ridge Apartments property and noted as being significantly disturbed by the construction of West Bobier Drive. One small bedrock milling feature was noted during the survey along with a scatter of 30 surface artifacts consisting of marine shell, animal bone, and lithic artifacts. The testing program resulted in the recovery of seven pieces of debitage, indicating a lock of subsurface cultural deposits. Due to the amount of past disturbance and the scarcity of cultural material, CA-SDI-5345 is not a significant archaeological resource under CEQA, and impacts to the site do not constitute significant environmental effects. This study does not cover the proposed Project APE, as the Vista Ridge Apartments is located northeast of the Project APE, north of Bobier Drive.

Previously Recorded Resources

The SCIC records indicate that a portion of one site, CA-SDI-5345/P-37-005345, is located within the northeastern portion of the Project APE. The records search results identified a total of 21 cultural resources previously recorded within one-mile of the Project APE (Table 2). Of the total 21 resources identified in the one-mile buffer, 16 are prehistoric resources and four are historic resources and one is a multicomponent site. No historic addresses have been recorded within the Project APE. The results of the records search and all DPR forms are located in Confidential Appendix A.

Table 2. Previously Recorded Cultural Resources in the One-Mile Record Search Radius

Primary Number	Trinomial	Age	Description	In/ Out of APE
P-37-004991	-	Prehistoric	Lithic scatter and metate fragment	Out
P-37-004992	-	Prehistoric	Lithic scatter and bedrock milling feature	Out
P-37-005345	CA-SDI-5345	Prehistoric	Bedrock milling with lithic scatter	In
P-37-005992	CA-SDI-5992	Historic	Guajome Ranch House	Out
P-37-006604	CA-SDI-6004	Prehistoric	Lithic scatter and flaking debris	Out
P-37-006088	CA-SDI-6088	Prehistoric	Bedrock milling with shell and lithic scatter	Out
P-37-006089	CA-SDI-6089	Prehistoric	Lithic fragments	Out
P-37-006090	CA-SDI-6090	Prehistoric	Bedrock milling feature with lithic scatter	Out

P-37-006091	CA-SDI-6091	Prehistoric	Bedrock milling with lithic scatter	Out
P-37-006092	CA-SDI-6092	Prehistoric	Bedrock milling features	Out
P-37-006093	CA-SDI-6093	Prehistoric	Bedrock milling with flakes	Out
P-37-008241	CA-SDI-8241	Prehistoric	Bedrock milling, pictographs, midden, shell, lithic tool scatter	Out
P-37-008242	CA-SDI-8242	Prehistoric	Village site and human burial of recent European origin	Out
P-37-011630	CA-SDI-11630	Prehistoric	Shell scatter	Out
P-37-013182	CA-SDI-13182H	Multicomponent	Prehistoric lithic tool scatter, bedrock milling features, and historic tiles and pottery	Out
P-37-019211	CA-SDI-15889	Prehistoric	Campsite with hearth feature, groundstone tool cache, and human burial	Out
P-37-028774	-	Historic	Vista Community Center	Out
P-37-029291	CA-SDI-18734	Prehistoric	Lithic tool scatter and debitage	Out
P-37-029400	-	Historic	Residential foundations, swimming pool, shed, palm nursery	Out
P-37-035549	-	Historic	Single family property	Out
P-37-038378	CA-SDI-22643	Prehistoric	Bedrock milling features	Out

CA-SDI-5345

As noted above, CA-SDI-5345 was recorded by B. Underwood in 1975 as a prehistoric bedrock milling feature with one milling element that consisted of a mortar. The SCIC GIS data maps CA-SDI-5345 within the northeastern corner of the Project APE (Confidential Appendix B). In 1975, B. Underwood noted that the property owners reported that the site contained handstones, metates, and small triangular projectile points, but lacked pottery. Since there was no official site form prepared by B. Underwood in 1975, P. Chace officially recorded CA-SDI-5345 in 1977 and noted midden soil adjacent to the bedrock milling granite. The approximate size of the site was undetermined, but P. Chace noted the site to be potentially larger than one acre. Chace conducted a testing program consisting of five test units, each approximately 5 square feet in 1978. The testing program yielded 24 artifacts consisting of a core, wedge-shaped piece of limestone, metate fragment, cobble handstone, and 20 flakes. The testing program concluded that the CA-SDI-5345 will not yield information important in prehistory and determined to not be a significant resource under CEQA, and no further work was recommended. R.L. Franklin revisited CA-SDI-5345 in 1979 and noted the site to be approximately 4m x 5m and consisting of bedrock grinding features, a midden, various handstones, two metates, and a metate fragment. In 2008, Affinis revisited the site and noted that most of CA-SDI-5345 had been destroyed by construction of West Bobier Drive. Two bedrock milling features were noted, two marine shells, and a piece of metavolcanic angular waste. No evidence was found to contradict the previous assessment of CA-SDI-5345 as not being a significant resource under CEQA.

ASM Affiliates Inc. conducted a survey in 2007 for the proposed Melrose Station Market Project, which is located immediately adjacent to CA-SDI-5345 and covers the current proposed Project APE. One bedrock milling slick was noted on a displaced granite boulder. The slick was relatively vertical which strongly implied that the boulder was disturbed and not in situ. No other archaeological evidence was noted during the survey. A marine shell fragment (*sp. Argopecten aequisulcatus*) was identified less than 5 meters from the eastern boundary fence adjacent to the location of CA-SDI-5345. The fragment was located on the surface and not in association with any midden soils. Three exploratory STPs were excavated during the survey immediately adjacent to the location where the shell was discovered. Within 20 cm below the surface, a modern ceramic fragment was recovered. The ceramic was decorated with a scallop shell set in epoxy resin. The scallop shell from the ceramic fragment is the same type of shell noted on the surface, therefore, the surface shell fragment is likely modern in origin. In addition, three backhoe trenches approximately 25 feet long, 2.5 to 3 feet deep, located approximately 5 feet apart, were excavated. No evidence of any buried cultural materials were found the trench excavations. There was an absence of materials from site CA-SDI-5345.

Affinis conducted a survey in 2012 for the proposed Vista Ridge Apartments Project and CA-SDI-5345 was located within the project area. One small bedrock milling feature and a surface scatter of shell and lithic artifacts consisting of 37 flaked stone artifacts, shell, animal bone, and historic glass and metal were noted. A testing program consisting of 12 shovel test pits was conducted and yielded seven pieces of debitage and three historic items. The testing program determined that the property has been subject to a great deal of past disturbance associated with develop of the two existing residential lots and the placement of fill soils with the development of West Bobier Drive. Native soil and bedrock were still exposed on the south-central and southeastern portions of the project and there is a possibility that cultural material still exist beneath the fill soils. The testing program concluded that CA-SDI-5345 is not a significant archaeological resource under CEQA, however, the area is of cultural importance to the Luiseño people, and significant cultural resources are known in the vicinity. The proposed current Project would not impact (direct or indirect) site CA-SDI-5345.

4.2 Archival Research

Historic topographic maps and historic aerial images were reviewed to understand the development of the Project area and surrounding properties at historicaerials.com (NETR 2022). Historic aerial photographs of the project site were available for 1938, 1946, 1953, 1964, 1967, 1978, 1980-1986, 1988-1991, 1993-2000, 2003, 2005, 2009, 2010, 2012, 2014, 2016, and 2018. The historic aerial from 1938 shows the Project APE disturbed by agricultural activities. West Bobier Drive/Ocean Boulevard exists as a dirt road immediately north of the Project APE and a residential structure appears to the east of the Project APE. The 1946 aerial shows crops within the southeastern portion of the Project APE, and the rest of the Project APE as being mass graded. The 1953 aerial shows a majority of the crops disappearing. The 1964 aerial shows some dirt roads cutting through the middle of the Project APE, and a residential development appears to the east. By 1967, more grading occurs along the perimeter and middle portion of the Project APE and another residential development appears to the northeast. The 1978 aerial shows some slight ground disturbance in the western portion of the Project APE. The 1980 aerial does not reveal any changes to the Project APE.

The 1981 aerial shows mass grading to the northern and western perimeters of the Project APE, likely for construction of West Bobier Drive/Ocean Boulevard and Melrose Drive. The 1982 aerial shows West Bobier Drive/Ocean Boulevard as paved asphalt roads with some grading within the northern and western perimeter of the Project APE. The 1983-1984 aerials do not reveal any changes to the Project APE. The 1985 aerial shows dirt

trails within the western and southern portion of the Project APE. The 1986-1990 aerials do not reveal any changes to the Project APE. By 1991, some landscaping occurs on the northwestern perimeter of the Project APE. The 1994 aerial shows dirt trails in the middle of the Project APE and some ground disturbance to the northeastern corner of the Project APE. The 1995 to 2002 aerials do not reveal any changes to the Project APE. The 2005 aerial shows mass grading within the entire Project APE. The 2009-2012 aerials do not reveal any changes to the Project APE. The 2014 aerial shows ground disturbance in the Project APE. The 2018 aerial shows some ground disturbance within the Project APE. The review of the historic aerial images demonstrates that the Project APE has undergone extensive earth movement from agricultural activities, construction of the adjacent roads, and some grading activity. No historic structures are located within the Project APE.

Historic topographic maps of the Project APE were reviewed (earliest map available from 1893) and do not show historic-age structures within the Project APE.

4.3 NAHC and Tribal Correspondence

A search of the NAHC Sacred Lands File was requested on February 21, 2022 for the Project APE and a one-mile buffer. The SLF consists of a database of known Native American resources. These resources may not be included in SCIC database. The NAHC replied on April 12, 2022 with positive results, however, the response does not state if TCRs are located within the Project APE or the search buffer. The NAHC also recommended contacting the La Jolla Band of Luiseño Indians, Pechanga Band of Mission Indians, and the San Luis Rey Band of Mission Indians for more information (Appendix C). The NAHC additionally provided a list of Native American tribes and individuals/organizations with traditional geographic associations that might have knowledge of cultural resources in this area.

Outreach letters were mailed on April 13, 2022, to all Native American group representatives included on the NAHC contact list (Appendix C). The purpose of these letters is to solicit additional information relating to Native American resources that may be impacted by the Project. Native American representatives were requested to define a general area where known resources intersect the Project APE. Four responses have been received to date. A response was received from the Pechanga Band of Mission Indians on April 15, 2022 stating that the Project area is located within their Ancestral Territory, located in proximity to two Luiseño Traditional Cultural Properties, located near five Ancestral Placename locations and two ceremonial locations, and believes the possibility for recovering subsurface artifacts during ground-disturbing activities is extremely high. A response was received from the San Luis Rey Band of Mission Indians on April 26, 2022, stating that they are aware of cultural resources within close proximity to the proposed Project and recommends including a Luiseño Native American monitor during all ground disturbing activities. A response was received from the Barona Band of Mission Indians on April 29, 2022, requesting to consult under AB52 with the City. A response was received from the Rincon Band of Luiseño Indians on May 3, 2022, stating the Project is located within their Area of Historic Interest, and the Project may impact tangible TCRs, Traditional Cultural Landscapes, and potential Traditional Cultural Properties. They recommended conducting a cultural resources study including a records search and survey of the property. The letters have been forwarded to the City and included in the report. No other communications between Dudek and the tribes has occurred since then. The NAHC correspondence is included in Appendix C.

In compliance with Assembly Bill 52, the City, as lead agency, is responsible for conducting government to government consultation with pertinent tribal entities. For information regarding Assembly Bill 52, please refer to the Project's CEQA document.

4.4 Intensive Pedestrian Survey

The current intensive pedestrian field survey was conducted by Dudek archaeologist Scott Wolf on March 18, 2022. Saving Sacred Sites Native American Monitor VI'i Sialo'i participated in the survey. All survey work was conducted employing standard archaeological procedures and techniques consistent with Secretary of the Interior Standards. 5-meter interval survey transects were conducted. Exposed ground surface areas, such as vegetation clearings, cut banks, and rodent burrows/spoils were inspected for potential subsurface deposits and sediment conditions.

The Project APE had moderate to poor ground surface visibility due to various levels of ground covering surface vegetation (Figure 3). Vegetation covered approximately 75% of the ground surface. The general level of previous ground disturbance is very high, as noted by evidence of grading excavations and various dirt berms, as well as several dispersed locations of construction waste dumping piles (Figure 4). Small mammal burrows were noted on the property, offering a limited sample of immediate sub-surface sediments. The rodent spoils were searched for potential subsurface artifacts or other cultural materials and no artifacts were identified.

The Project APE has a discernable south-facing slope, with the lowest elevation along the southern edge of the Project APE. There are multiple large granite bedrock boulders located in the remains of a natural seasonal drainage along the south-central edge of the Project APE, all heavily exfoliated and damaged on outer surfaces. No milling surfaces were identified on these boulders. Additionally, three granite bedrock boulders are located along the southeastern corner of the Project APE (Figure 5). These boulders were inspected for cultural features, and none were identified. It strongly appears that the boulders are not in situ and have been placed in their current location.

No new artifacts or features were identified during the pedestrian survey. The previously recorded displaced milling feature identified during the 2007 ASM Affiliates survey of the Project APE is now missing and was not relocated during the current survey (Figure 6). In 2007-2008, this feature was presumed to have been displaced from the immediately adjacent site, CA-SDI-5345.

No artifacts or features were identified within the previously recorded site boundaries of CA-SDI-5345 or in the vicinity associated with CA-SDI-5345. CA-SDI-5345 was not relocated within the Project APE. No artifacts or features were identified during this survey and no structures are present in the Project APE; therefore, there are no historical resources located within the Project APE.

5 Summary and Management Considerations

5.1 Archaeological Recommendations

Dudek's Phase I cultural resources inventory of the Project indicates there is moderate to high sensitivity for identifying intact subsurface archaeological deposits during Project implementation. The SCIC records search did identify CA-SDI-5345 within the northeastern corner of the Project APE, however, the pedestrian survey did not relocate CA-SDI-5345 or any resources within the Project APE. CA-SDI-5345 was previously determined as ineligible for listing for the CRHR and NRHP and is not significant under CEQA or the City of Oceanside Guidelines.

As there are no cultural resources in the APE, no historical resources, as defined under CEQA will be impacted by the Project. This includes no direct, indirect, or cumulative impacts. The portion of CA-SDI-5345 within the Project APE has been destroyed. The site is not a significant archaeological resource under CEQA, however, the Project APE

is located in close proximity to culturally sensitive areas such as village sites and ceremonial areas, numerous cultural resources have been noted to be within proximity to the Project APE, and the Project APE is in close proximity to a drainage. Given the sensitivity of the area, there is potential for subsurface cultural resources, therefore, it is recommended that a qualified archaeologist and TCA Native American Monitor representing a TCA Luiseño Tribe are present during all ground-disturbing activities.

Unanticipated Discovery of Archaeological Resources

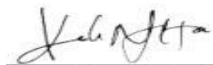
In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the Project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards can evaluate the significance of the find. Construction activities may continue in other areas, but should be redirected a safe distance from the find. If the new discovery is evaluated and found to be significant under CEQA and avoidance is not feasible, additional work such as data recovery may be warranted. In such an event, a data recovery plan should be developed by the qualified archaeologist in consultation with the City and Native American representatives, if applicable. Ground disturbing work can continue in the area of the find only after impacts to the resources have been mitigated and with City approval.

Unanticipated Discovery of Human Remains

In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the County Coroner shall be immediately notified of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the NAHC in Sacramento within 24 hours. In accordance with California Public Resources Code Section 5097.98, the NAHC must immediately notify the person or persons it believes to be the MLD from the deceased Native American. The MLD shall complete inspection within 48 hours of being granted access to the site and make recommendations for the treatment and disposition, in consultation with the property owner, of the human remains.

Should you have any questions relating to this report and its findings, please do not hesitate to contact me at 619.949.3082 or kmontifolca@dudek.com.

Sincerely,



Keshia Montifolca, M.A., RPA
Archaeologist

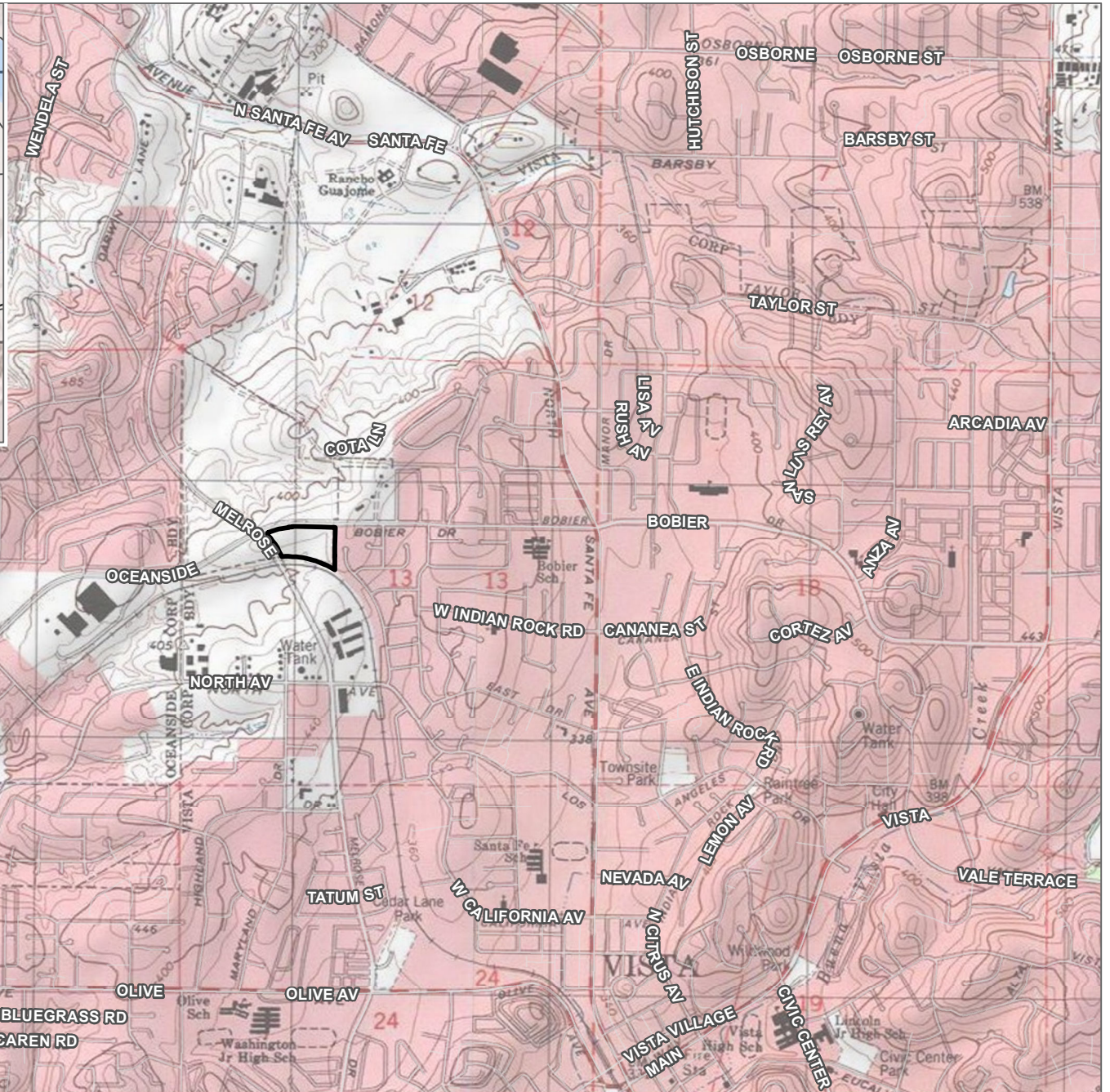
Att.: Figure 1, Project Location
Figure 2, APE Map
Figure 3, Overview APE
Figure 4, Construction Waste
Figure 5, Non-cultural boulders
Figure 6, Overview of eastern APE
National Archaeological Database Information Sheet
Confidential Appendix A, SCIC Records Search Results
Confidential Appendix B, APE Map and Updated DPR Form
Appendix C, Tribal Correspondence
cc: Angela Pham, Micah Hale, Dudek


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 Project Boundary

SOURCE: USGS 7.5-Minute Series San Luis Rey Quadrangle



FIGURE 1
Project Location
Modera Melrose Project



SOURCE: Bing Imagery 2022



FIGURE 2
Area of Potential Effects
Modera Melrose Project



Figure 3. Overview of APE, view facing northeast.



Figure 4. Construction waste, view facing south.



Figure 5. Non-cultural boulders, view facing north.



Figure 6. Overview of northeastern APE; bedrock milling feature missing, view facing east.

National Archaeological Database (NADB) Information

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Firm:	Dudek
Project Proponent:	City of Oceanside
Report Date:	August 2022
Report Title:	Cultural Resources Inventory Report for the Modera Melrose Project, Oceanside, California
Type of Study:	Cultural Resources Inventory
Resources:	CA-SDI-5345
USGS Quads:	San Luis Rey, California, Township 11 South, Range 4 West, Section 34
Acreage:	7.4
Permit Numbers:	N/A
Keywords:	Pedestrian Survey, Inventory, City of Oceanside, negative survey

TO: MR. MCGLASHAN
SUBJECT: CULTURAL RESOURCES INVENTORY REPORT FOR THE MODERAL MELROSE PROJECT, OCEANSIDE,
CALIFORNIA

Confidential Appendix A

SCIC Records Search Results

Confidential Appendix B

APE Map with Previously Recorded Sites and Updated DPR Form

TO: MR. MCGLASHAN
SUBJECT: CULTURAL RESOURCES INVENTORY REPORT FOR THE MODERA MELROSE PROJECT, OCEANSIDE,
CALIFORNIA

Appendix C

Tribal Correspondence

NATIVE AMERICAN HERITAGE COMMISSION

April 12, 2022

Keshia Montifolca
Dudek

Via Email to: kmontifolca@dudek.com

Re: Modera Melrose (13937) Project, San Diego County

Dear Ms. Montifolca:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information submitted for the above referenced project. The results were positive. Please contact the La Jolla Band of Luiseno Indians, the Pechanga Band of Indians, and the San Luis Rey Band of Mission Indians on the attached list for information. Please note that tribes do not always record their sacred sites in the SLF, nor are they required to do so. A SLF search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with a project's geographic area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites, such as the appropriate regional California Historical Research Information System (CHRIS) archaeological Information Center for the presence of recorded archaeological sites.

Attached is a list of Native American tribes who may also have knowledge of cultural resources in the project area. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. Please contact all of those listed; if they cannot supply information, they may recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call or email to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from tribes, please notify the NAHC. With your assistance, we can assure that our lists contain current information.

If you have any questions or need additional information, please contact me at my email address: Andrew.Green@nahc.ca.gov.

Sincerely,



Andrew Green
Cultural Resources Analyst

Attachment



CHAIRPERSON
Laura Miranda
Luiseño

VICE CHAIRPERSON
Reginald Pagaling
Chumash

PARLIAMENTARIAN
Russell Attebery
Karuk

SECRETARY
Sara Dutschke
Miwok

COMMISSIONER
William Mungary
Paiute/White Mountain
Apache

COMMISSIONER
Isaac Bojorquez
Ohlone-Costanoan

COMMISSIONER
Buffy McQuillen
Yokayo Pomo, Yuki,
Nomlaki

COMMISSIONER
Wayne Nelson
Luiseño

COMMISSIONER
Stanley Rodriguez
Kumeyaay

EXECUTIVE SECRETARY
Raymond C. Hitchcock
Miwok/Nisenan

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

**Native American Heritage Commission
Native American Contact List
San Diego County
4/12/2022**

Barona Group of the Capitan Grande

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

Campo Band of Diegueno Mission Indians

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

Ewiiapaayp Band of Kumeyaay Indians

Robert Pinto, Chairperson
4054 Willows Road Diegueno
Alpine, CA, 91901
Phone: (619) 368 - 4382
Fax: (619) 445-9126
ceo@ebki-nsn.gov

Ewiiapaayp Band of Kumeyaay Indians

Michael Garcia, Vice Chairperson
4054 Willows Road Diegueno
Alpine, CA, 91901
Phone: (619) 933 - 2200
Fax: (619) 445-9126
michaelg@leaningrock.net

Iipay Nation of Santa Ysabel

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

Iipay Nation of Santa Ysabel

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

Inaja-Cosmit Band of Indians

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

Jamul Indian Village

Erica Pinto, Chairperson
P.O. Box 612 Diegueno
Jamul, CA, 91935
Phone: (619) 669 - 4785
Fax: (619) 669-4817
epinto@jiv-nsn.gov

Jamul Indian Village

Lisa Cumper, Tribal Historic Preservation Officer
P.O. Box 612 Diegueno
Jamul, CA, 91935
Phone: (619) 669 - 4855
lcumper@jiv-nsn.gov

Kwaaymii Laguna Band of Mission Indians

Carmen Lucas,
P.O. Box 775 Kwaaymii
Pine Valley, CA, 91962 Diegueno
Phone: (619) 709 - 4207

La Jolla Band of Luiseno Indians

Norma Contreras, Chairperson
22000 Highway 76 Luiseno
Pauma Valley, CA, 92061
Phone: (760) 742 - 3771

La Posta Band of Diegueno Mission Indians

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

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 Modera Melrose (13937) Project, San Diego County.

**Native American Heritage Commission
Native American Contact List
San Diego County
4/12/2022**

**La Posta Band of Diegueno
Mission Indians**

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

**Manzanita Band of Kumeyaay
Nation**

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

**Mesa Grande Band of Diegueno
Mission Indians**

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

Pala Band of Mission Indians

Shasta Gaughen, Tribal Historic
Preservation Officer
PMB 50, 35008 Pala Temecula Cupeno
Rd. Luiseno
Pala, CA, 92059
Phone: (760) 891 - 3515
Fax: (760) 742-3189
sgaughen@palatribe.com

Pauma Band of Luiseno Indians

Temet Aguilar, Chairperson
P.O. Box 369 Luiseno
Pauma Valley, CA, 92061
Phone: (760) 742 - 1289
Fax: (760) 742-3422
bennaecalac@aol.com

Pechanga Band of Indians

Paul Macarro, Cultural Resources
Coordinator
P.O. Box 1477 Luiseno
Temecula, CA, 92593
Phone: (951) 770 - 6306
Fax: (951) 506-9491
pmacarro@pechanga-nsn.gov

Pechanga Band of Indians

Mark Macarro, Chairperson
P.O. Box 1477 Luiseno
Temecula, CA, 92593
Phone: (951) 770 - 6000
Fax: (951) 695-1778
epreston@pechanga-nsn.gov

Rincon Band of Luiseno Indians

Bo Mazzetti, Chairperson
One Government Center Lane Luiseno
Valley Center, CA, 92082
Phone: (760) 749 - 1051
Fax: (760) 749-5144
bomazzetti@aol.com

Rincon Band of Luiseno Indians

Cheryl Madrigal, Tribal Historic
Preservation Officer
One Government Center Lane Luiseno
Valley Center, CA, 92082
Phone: (760) 297 - 2635
crd@rincon-nsn.gov

**San Luis Rey Band of Mission
Indians**

1889 Sunset Drive Luiseno
Vista, CA, 92081
Phone: (760) 724 - 8505
Fax: (760) 724-2172
cjmojado@slrmissionindians.org

**San Luis Rey Band of Mission
Indians**

San Luis Rey, Tribal Council
1889 Sunset Drive Luiseno
Vista, CA, 92081
Phone: (760) 724 - 8505
Fax: (760) 724-2172
cjmojado@slrmissionindians.org

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**Native American Heritage Commission
Native American Contact List
San Diego County
4/12/2022**

**San Pasqual Band of Diegueno
Mission Indians**

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

**Sycuan Band of the Kumeyaay
Nation**

Kristie Orosco, Kumeyaay
Resource Specialist
1 Kwaaypaay Court Kumeyaay
El Cajon, CA, 92019
Phone: (619) 445 - 6917

**San Pasqual Band of Diegueno
Mission Indians**

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

**Viejas Band of Kumeyaay
Indians**

Ernest Pingleton, Tribal Historic
Officer, Resource Management
1 Viejas Grade Road Diegueno
Alpine, CA, 91901
Phone: (619) 659 - 2314
epingleton@viejas-nsn.gov

**Soboba Band of Luiseno
Indians**

Joseph Ontiveros, Cultural
Resource Department
P.O. BOX 487 Cahuilla
San Jacinto, CA, 92581 Luiseno
Phone: (951) 663 - 5279
Fax: (951) 654-4198
jontiveros@soboba-nsn.gov

**Viejas Band of Kumeyaay
Indians**

John Christman, Chairperson
1 Viejas Grade Road Diegueno
Alpine, CA, 91901
Phone: (619) 445 - 3810
Fax: (619) 445-5337

**Soboba Band of Luiseno
Indians**

Isaiah Vivanco, Chairperson
P. O. Box 487 Cahuilla
San Jacinto, CA, 92581 Luiseno
Phone: (951) 654 - 5544
Fax: (951) 654-4198
ivivanco@soboba-nsn.gov

**Sycuan Band of the Kumeyaay
Nation**

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

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This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Modera Melrose (13937) Project, San Diego County.

April 13, 2022

13937

Mr. Edwin (Thorpe) Romero, Chairperson
Barona Group of the Capitan Grande
1095 Barona Road
Lakeside, CA 92040

Subject: Information Request for the Modera Melrose Project in Oceanside, California

Dear Mr. Romero,

The proposed Modera Melrose Project consists of the construction of a 280-unit residential project on approximately 7.4-acre property covering two parcels (APNs 161-030-23-00 and 161-030-24-00) located at the southeast corner of Melrose Drive and West Bobier Drive in the City of Oceanside, California in northwest San Diego County. The project site falls within Section 13 of Township 11 South, Range 4 West, 3 West of the San Luis Rey, California 7.5-minute U.S. Geological Survey Topographic Quadrangle Map (Figure 1).

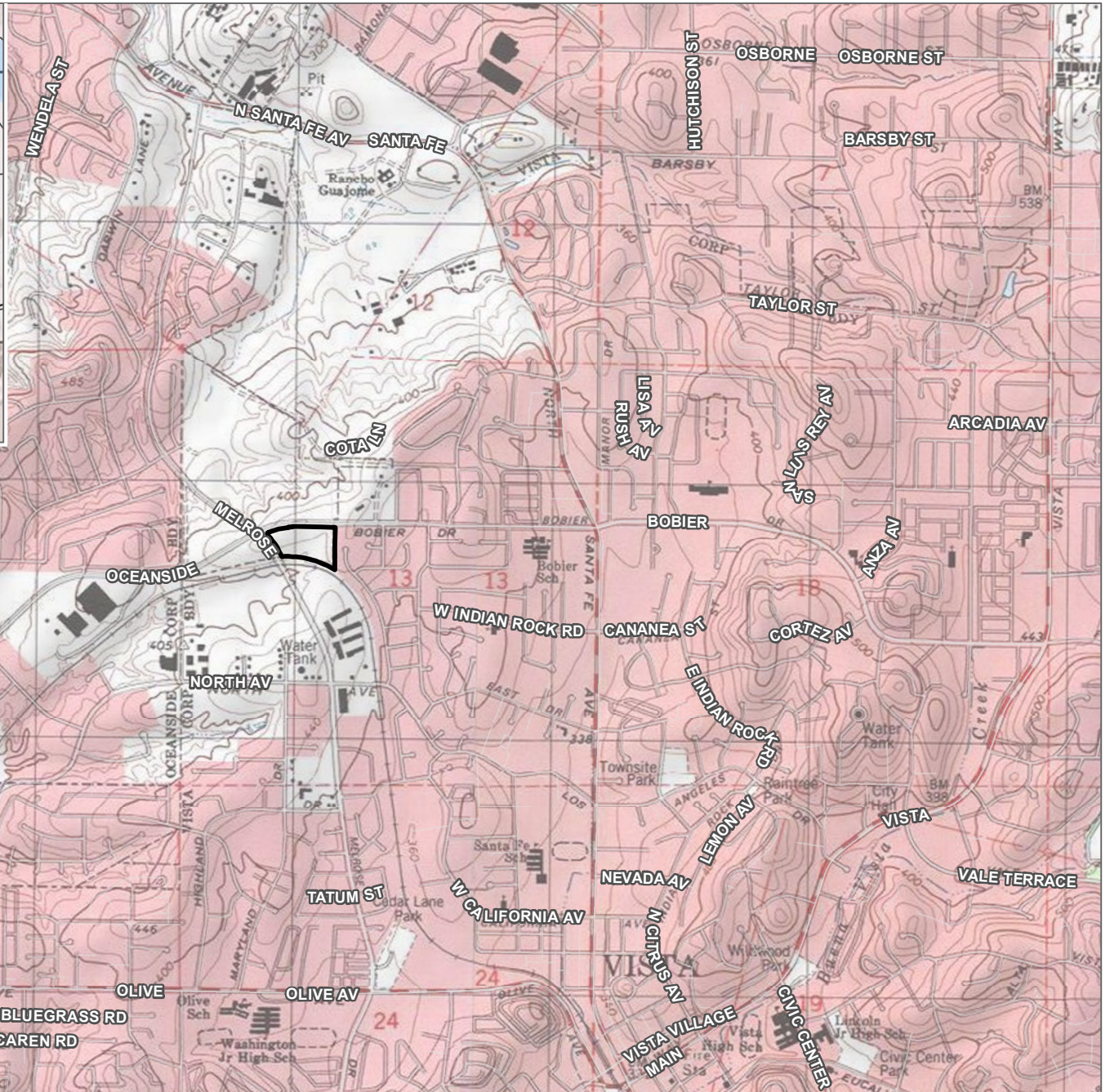
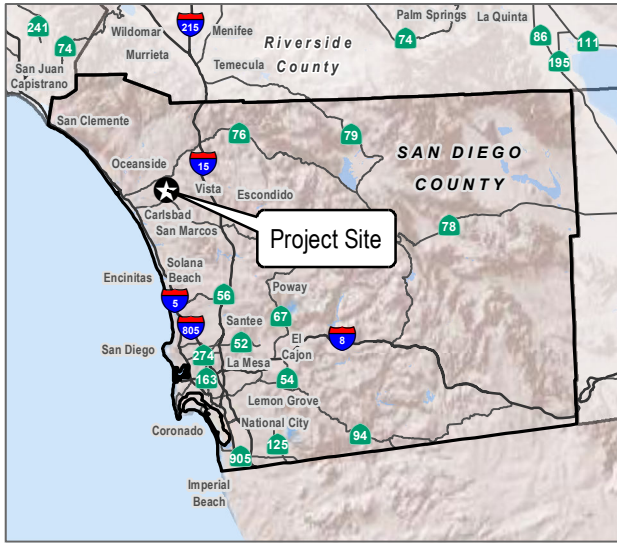
The Native American Heritage Commission conducted a Sacred Lands file search. The results were positive. I am writing as part of the cultural inventory process in order find out if you, or your tribal community, have any knowledge of cultural resources or places that may be impacted by the proposed project. This letter does not constitute formal government to government consultation pursuant to Assembly Bill 52.

If you have any information or concerns pertaining to such information, please contact me.

Respectfully,



Keshia Montifolca, M.A., RPA
Archaeologist
DUDEK
Phone: (619) 949-3082
Email: kmontifolca@dudek.com



SOURCE: USGS 7.5-Minute Series San Luis Rey Quadrangle



FIGURE 1

Project Location

Modera Melrose Project

April 13, 2022

13937

Mr. Ralph Goff, Chairperson
Campo Band of Diegueno Mission Indians
36190 Church Road, Suite 1
Campo, CA 91906

Subject: Information Request for the Modera Melrose Project in Oceanside, California

Dear Mr. Goff,

The proposed Modera Melrose Project consists of the construction of a 280-unit residential project on approximately 7.4-acre property covering two parcels (APNs 161-030-23-00 and 161-030-24-00) located at the southeast corner of Melrose Drive and West Bobier Drive in the City of Oceanside, California in northwest San Diego County. The project site falls within Section 13 of Township 11 South, Range 4 West, 3 West of the San Luis Rey, California 7.5-minute U.S. Geological Survey Topographic Quadrangle Map (Figure 1).

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Keshia Montifolca, M.A., RPA
Archaeologist
DUDEK
Phone: (619) 949-3082
Email: kmontifolca@dudek.com

April 13, 2022

13937

Mr. Robert Pinto, Chairperson
Ewiaapaayp Tribe
4054 Willow Rd.
Alpine, CA 91901

Subject: Information Request for the Modera Melrose Project in Oceanside, California

Dear Mr. Pinto,

The proposed Modera Melrose Project consists of the construction of a 280-unit residential project on approximately 7.4-acre property covering two parcels (APNs 161-030-23-00 and 161-030-24-00) located at the southeast corner of Melrose Drive and West Bobier Drive in the City of Oceanside, California in northwest San Diego County. The project site falls within Section 13 of Township 11 South, Range 4 West, 3 West of the San Luis Rey, California 7.5-minute U.S. Geological Survey Topographic Quadrangle Map (Figure 1).

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Keshia Montifolca, M.A., RPA
Archaeologist
DUDEK
Phone: (619) 949-3082
Email: kmontifolca@dudek.com

April 13, 2022

13937

Mr. Michael Garcia, Vice Chairperson
Ewiiapaayp Tribe
4054 Willows Road
Alpine, CA 91901

Subject: Information Request for the Modera Melrose Project in Oceanside, California

Dear Mr. Garcia,

The proposed Modera Melrose Project consists of the construction of a 280-unit residential project on approximately 7.4-acre property covering two parcels (APNs 161-030-23-00 and 161-030-24-00) located at the southeast corner of Melrose Drive and West Bobier Drive in the City of Oceanside, California in northwest San Diego County. The project site falls within Section 13 of Township 11 South, Range 4 West, 3 West of the San Luis Rey, California 7.5-minute U.S. Geological Survey Topographic Quadrangle Map (Figure 1).

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Archaeologist
DUDEK
Phone: (619) 949-3082
Email: kmontifolca@dudek.com

April 13, 2022

13937

Mr. Virgil Perez, Chairperson
Iipay Nation of Santa Ysabel
P.O. Box 130
Santa Ysabel, CA 92070

Subject: Information Request for the Modera Melrose Project in Oceanside, California

Dear Mr. Perez,

The proposed Modera Melrose Project consists of the construction of a 280-unit residential project on approximately 7.4-acre property covering two parcels (APNs 161-030-23-00 and 161-030-24-00) located at the southeast corner of Melrose Drive and West Bobier Drive in the City of Oceanside, California in northwest San Diego County. The project site falls within Section 13 of Township 11 South, Range 4 West, 3 West of the San Luis Rey, California 7.5-minute U.S. Geological Survey Topographic Quadrangle Map (Figure 1).

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Respectfully,



Keshia Montifolca, M.A., RPA
Archaeologist
DUDEK
Phone: (619) 949-3082
Email: kmontifolca@dudek.com

April 13, 2022

13937

Ms. Rebecca Osuna, Chairperson
Inaja-Cosmit Band of Indians
2005 S. Escondido Blvd.
Escondido, CA 92025

Subject: Information Request for the Modera Melrose Project in Oceanside, California

Dear Ms. Osuna,

The proposed Modera Melrose Project consists of the construction of a 280-unit residential project on approximately 7.4-acre property covering two parcels (APNs 161-030-23-00 and 161-030-24-00) located at the southeast corner of Melrose Drive and West Bobier Drive in the City of Oceanside, California in northwest San Diego County. The project site falls within Section 13 of Township 11 South, Range 4 West, 3 West of the San Luis Rey, California 7.5-minute U.S. Geological Survey Topographic Quadrangle Map (Figure 1).

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Respectfully,



Keshia Montifolca, M.A., RPA
Archaeologist
DUDEK
Phone: (619) 949-3082
Email: kmontifolca@dudek.com

April 13, 2022

13937

Mr. Clint Linton, Director of Cultural Resources
Iipay Nation of Santa Ysabel
P.O. Box 507
Santa Ysabel, CA 92070

Subject: Information Request for the Modera Melrose Project in Oceanside, California

Dear Mr. Linton,

The proposed Modera Melrose Project consists of the construction of a 280-unit residential project on approximately 7.4-acre property covering two parcels (APNs 161-030-23-00 and 161-030-24-00) located at the southeast corner of Melrose Drive and West Bobier Drive in the City of Oceanside, California in northwest San Diego County. The project site falls within Section 13 of Township 11 South, Range 4 West, 3 West of the San Luis Rey, California 7.5-minute U.S. Geological Survey Topographic Quadrangle Map (Figure 1).

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If you have any information or concerns pertaining to such information, please contact me.

Respectfully,



Keshia Montifolca, M.A., RPA
Archaeologist
DUDEK
Phone: (619) 949-3082
Email: kmontifolca@dudek.com

April 13, 2022

13937

Ms. Lisa Cumper, THPO
Jamul Indian Village
P.O. Box 612
Jamul, CA 91935

Subject: Information Request for the Modera Melrose Project in Oceanside, California

Dear Ms. Cumper,

The proposed Modera Melrose Project consists of the construction of a 280-unit residential project on approximately 7.4-acre property covering two parcels (APNs 161-030-23-00 and 161-030-24-00) located at the southeast corner of Melrose Drive and West Bobier Drive in the City of Oceanside, California in northwest San Diego County. The project site falls within Section 13 of Township 11 South, Range 4 West, 3 West of the San Luis Rey, California 7.5-minute U.S. Geological Survey Topographic Quadrangle Map (Figure 1).

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Keshia Montifolca, M.A., RPA
Archaeologist
DUDEK
Phone: (619) 949-3082
Email: kmontifolca@dudek.com

April 13, 2022

13937

Ms. Erica Pinto, Chairperson
Jamul Indian Village
P.O. Box 612
Jamul, CA 91935

Subject: Information Request for the Modera Melrose Project in Oceanside, California

Dear Ms. Pinto,

The proposed Modera Melrose Project consists of the construction of a 280-unit residential project on approximately 7.4-acre property covering two parcels (APNs 161-030-23-00 and 161-030-24-00) located at the southeast corner of Melrose Drive and West Bobier Drive in the City of Oceanside, California in northwest San Diego County. The project site falls within Section 13 of Township 11 South, Range 4 West, 3 West of the San Luis Rey, California 7.5-minute U.S. Geological Survey Topographic Quadrangle Map (Figure 1).

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Respectfully,



Keshia Montifolca, M.A., RPA
Archaeologist
DUDEK
Phone: (619) 949-3082
Email: kmontifolca@dudek.com

April 13, 2022

13937

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

Subject: Information Request for the Modera Melrose Project in Oceanside, California


Dear Ms. Lucas,

The proposed Modera Melrose Project consists of the construction of a 280-unit residential project on approximately 7.4-acre property covering two parcels (APNs 161-030-23-00 and 161-030-24-00) located at the southeast corner of Melrose Drive and West Bobier Drive in the City of Oceanside, California in northwest San Diego County. The project site falls within Section 13 of Township 11 South, Range 4 West, 3 West of the San Luis Rey, California 7.5-minute U.S. Geological Survey Topographic Quadrangle Map (Figure 1).

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Respectfully,



Keshia Montifolca, M.A., RPA
Archaeologist
DUDEK
Phone: (619) 949-3082
Email: kmontifolca@dudek.com

April 13, 2022

13937

Ms. Norma Contreras, Chairperson
La Jolla Band of Mission Indians
22000 Highway 76
Pauma Valley, CA 92061

Subject: Information Request for the Modera Melrose Project in Oceanside, California

Dear Ms. Contreras,

The proposed Modera Melrose Project consists of the construction of a 280-unit residential project on approximately 7.4-acre property covering two parcels (APNs 161-030-23-00 and 161-030-24-00) located at the southeast corner of Melrose Drive and West Bobier Drive in the City of Oceanside, California in northwest San Diego County. The project site falls within Section 13 of Township 11 South, Range 4 West, 3 West of the San Luis Rey, California 7.5-minute U.S. Geological Survey Topographic Quadrangle Map (Figure 1).

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Keshia Montifolca, M.A., RPA
Archaeologist
DUDEK
Phone: (619) 949-3082
Email: kmontifolca@dudek.com

April 13, 2022

13937

Ms. Gwendolyn Parada, Chairperson
La Posta Band of Diegueno Mission Indians
8 Crestwood Rd.
Boulevard, CA 91905

Subject: Information Request for the Modera Melrose Project in Oceanside, California

Dear Ms. Parada,

The proposed Modera Melrose Project consists of the construction of a 280-unit residential project on approximately 7.4-acre property covering two parcels (APNs 161-030-23-00 and 161-030-24-00) located at the southeast corner of Melrose Drive and West Bobier Drive in the City of Oceanside, California in northwest San Diego County. The project site falls within Section 13 of Township 11 South, Range 4 West, 3 West of the San Luis Rey, California 7.5-minute U.S. Geological Survey Topographic Quadrangle Map (Figure 1).

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Keshia Montifolca, M.A., RPA
Archaeologist
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MAIN OFFICE
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April 13, 2022

13937

Ms. Javaughn Miller, Tribal Administrator
La Posta Band of Diegueno Mission Indians
8 Crestwood Rd.
Boulevard, CA 91905

Subject: Information Request for the Modera Melrose Project in Oceanside, California

Dear Ms. Miller,

The proposed Modera Melrose Project consists of the construction of a 280-unit residential project on approximately 7.4-acre property covering two parcels (APNs 161-030-23-00 and 161-030-24-00) located at the southeast corner of Melrose Drive and West Bobier Drive in the City of Oceanside, California in northwest San Diego County. The project site falls within Section 13 of Township 11 South, Range 4 West, 3 West of the San Luis Rey, California 7.5-minute U.S. Geological Survey Topographic Quadrangle Map (Figure 1).

The Native American Heritage Commission conducted a Sacred Lands file search. The results were positive. I am writing as part of the cultural inventory process in order find out if you, or your tribal community, have any knowledge of cultural resources or places that may be impacted by the proposed project. This letter does not constitute formal government to government consultation pursuant to Assembly Bill 52.

If you have any information or concerns pertaining to such information, please contact me.

Respectfully,

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April 13, 2022

13937

Ms. Angela Elliott Santos, Chairperson
Manzanita Band of Kumeyaay Nation
P.O. Box 1302
Boulevard, CA 91905

Subject: Information Request for the Modera Melrose Project in Oceanside, California

Dear Ms. Santos,

The proposed Modera Melrose Project consists of the construction of a 280-unit residential project on approximately 7.4-acre property covering two parcels (APNs 161-030-23-00 and 161-030-24-00) located at the southeast corner of Melrose Drive and West Bobier Drive in the City of Oceanside, California in northwest San Diego County. The project site falls within Section 13 of Township 11 South, Range 4 West, 3 West of the San Luis Rey, California 7.5-minute U.S. Geological Survey Topographic Quadrangle Map (Figure 1).

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April 13, 2022

13937

Mr. Michael Linton, Chairperson
Mesa Grande Band of Dieguneo Mission Indians
P.O. Box 270
Santa Ysabel, CA 92070

Subject: Information Request for the Modera Melrose Project in Oceanside, California

Dear Mr. Linton,

The proposed Modera Melrose Project consists of the construction of a 280-unit residential project on approximately 7.4-acre property covering two parcels (APNs 161-030-23-00 and 161-030-24-00) located at the southeast corner of Melrose Drive and West Bobier Drive in the City of Oceanside, California in northwest San Diego County. The project site falls within Section 13 of Township 11 South, Range 4 West, 3 West of the San Luis Rey, California 7.5-minute U.S. Geological Survey Topographic Quadrangle Map (Figure 1).

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April 13, 2022

13937

Ms. Shasta Gaughen, Tribal Historic Preservation Officer
Pala Band of Mission Indians
35008 Pala Temecula Rd.
Pala, CA 92059

Subject: Information Request for the Modera Melrose Project in Oceanside, California


Dear Ms. Gaughen,

The proposed Modera Melrose Project consists of the construction of a 280-unit residential project on approximately 7.4-acre property covering two parcels (APNs 161-030-23-00 and 161-030-24-00) located at the southeast corner of Melrose Drive and West Bobier Drive in the City of Oceanside, California in northwest San Diego County. The project site falls within Section 13 of Township 11 South, Range 4 West, 3 West of the San Luis Rey, California 7.5-minute U.S. Geological Survey Topographic Quadrangle Map (Figure 1).

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April 13, 2022

13937

Mr. Temet Aguilar, Chairperson
Pauma & Yuima Reservation
P.O. Box 369
Pauma Valley, CA 92061

Subject: Information Request for the Modera Melrose Project in Oceanside, California

Dear Mr. Aguilar,

The proposed Modera Melrose Project consists of the construction of a 280-unit residential project on approximately 7.4-acre property covering two parcels (APNs 161-030-23-00 and 161-030-24-00) located at the southeast corner of Melrose Drive and West Bobier Drive in the City of Oceanside, California in northwest San Diego County. The project site falls within Section 13 of Township 11 South, Range 4 West, 3 West of the San Luis Rey, California 7.5-minute U.S. Geological Survey Topographic Quadrangle Map (Figure 1).

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April 13, 2022

13937

Mr. Paul Macarro, Cultural Resources Manager
Pechanga Band of Mission Indians
P.O. Box 1477
Temecula, CA 92593

Subject: Information Request for the Modera Melrose Project in Oceanside, California

Dear Mr. Macarro,

The proposed Modera Melrose Project consists of the construction of a 280-unit residential project on approximately 7.4-acre property covering two parcels (APNs 161-030-23-00 and 161-030-24-00) located at the southeast corner of Melrose Drive and West Bobier Drive in the City of Oceanside, California in northwest San Diego County. The project site falls within Section 13 of Township 11 South, Range 4 West, 3 West of the San Luis Rey, California 7.5-minute U.S. Geological Survey Topographic Quadrangle Map (Figure 1).

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April 13, 2022

13937

Mr. Mark Macarro, Chairperson
Pechanga Band of Mission Indians
P.O. Box 1477
Temecula, CA 92593

Subject: Information Request for the Modera Melrose Project in Oceanside, California

Dear Mr. Macarro,

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April 13, 2022

13937

Mr. Bo Mazzetti, Chairperson
Rincon Band of Luiseño Indians
1 Government Center Lane
Valley Center, CA 92082

Subject: Information Request for the Modera Melrose Project in Oceanside, California

Dear Mr. Mazzetti,

The proposed Modera Melrose Project consists of the construction of a 280-unit residential project on approximately 7.4-acre property covering two parcels (APNs 161-030-23-00 and 161-030-24-00) located at the southeast corner of Melrose Drive and West Bobier Drive in the City of Oceanside, California in northwest San Diego County. The project site falls within Section 13 of Township 11 South, Range 4 West, 3 West of the San Luis Rey, California 7.5-minute U.S. Geological Survey Topographic Quadrangle Map (Figure 1).

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April 13, 2022

13937

Ms. Cheryl Madrigal, Tribal Historic Preservation Officer
Rincon Band of Mission Indians
One Government Center Lane
Valley Center, CA 92082

Subject: Information Request for the Modera Melrose Project in Oceanside, California

Dear Ms. Madrigal,

The proposed Modera Melrose Project consists of the construction of a 280-unit residential project on approximately 7.4-acre property covering two parcels (APNs 161-030-23-00 and 161-030-24-00) located at the southeast corner of Melrose Drive and West Bobier Drive in the City of Oceanside, California in northwest San Diego County. The project site falls within Section 13 of Township 11 South, Range 4 West, 3 West of the San Luis Rey, California 7.5-minute U.S. Geological Survey Topographic Quadrangle Map (Figure 1).

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April 13, 2022

13937

Cultural Department ,
San Luis Rey Band of Mission Indians
1889 Sunset Dr.
Vista, CA 92081

Subject: Information Request for the Modera Melrose Project in Oceanside, California

Dear San Luis Rey Band Cultural Department,

The proposed Modera Melrose Project consists of the construction of a 280-unit residential project on approximately 7.4-acre property covering two parcels (APNs 161-030-23-00 and 161-030-24-00) located at the southeast corner of Melrose Drive and West Bobier Drive in the City of Oceanside, California in northwest San Diego County. The project site falls within Section 13 of Township 11 South, Range 4 West, 3 West of the San Luis Rey, California 7.5-minute U.S. Geological Survey Topographic Quadrangle Map (Figure 1).

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April 13, 2022

13937

Tribal Council ,
San Luis Rey Band of Mission Indians
1889 Sunset Dr.
Vista, CA 92081

Subject: Information Request for the Modera Melrose Project in Oceanside, California

Dear San Luis Rey Band Tribal Council,

The proposed Modera Melrose Project consists of the construction of a 280-unit residential project on approximately 7.4-acre property covering two parcels (APNs 161-030-23-00 and 161-030-24-00) located at the southeast corner of Melrose Drive and West Bobier Drive in the City of Oceanside, California in northwest San Diego County. The project site falls within Section 13 of Township 11 South, Range 4 West, 3 West of the San Luis Rey, California 7.5-minute U.S. Geological Survey Topographic Quadrangle Map (Figure 1).

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April 13, 2022

13937

Mr. John Flores, Environmental Coordinator
San Pasqual Band of Diegueno Mission Indians
P.O. Box 365
Valley Center, CA 92082

Subject: Information Request for the Modera Melrose Project in Oceanside, California

Dear Mr. Flores,

The proposed Modera Melrose Project consists of the construction of a 280-unit residential project on approximately 7.4-acre property covering two parcels (APNs 161-030-23-00 and 161-030-24-00) located at the southeast corner of Melrose Drive and West Bobier Drive in the City of Oceanside, California in northwest San Diego County. The project site falls within Section 13 of Township 11 South, Range 4 West, 3 West of the San Luis Rey, California 7.5-minute U.S. Geological Survey Topographic Quadrangle Map (Figure 1).

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April 13, 2022

13937

Mr. Allen E. Lawson, Chairperson
San Pasqual Band of Diegueno Mission Indians
P.O. Box 365
Valley Center, CA 92082

Subject: Information Request for the Modera Melrose Project in Oceanside, California


Dear Mr. Lawson,

The proposed Modera Melrose Project consists of the construction of a 280-unit residential project on approximately 7.4-acre property covering two parcels (APNs 161-030-23-00 and 161-030-24-00) located at the southeast corner of Melrose Drive and West Bobier Drive in the City of Oceanside, California in northwest San Diego County. The project site falls within Section 13 of Township 11 South, Range 4 West, 3 West of the San Luis Rey, California 7.5-minute U.S. Geological Survey Topographic Quadrangle Map (Figure 1).

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April 13, 2022

13937

Mr. Joseph Ontiveros, Cultural Resource Department
Soboba Band of Luiseno Indians
P.O. Box 487
San Jacinto, CA 92581

Subject: Information Request for the Modera Melrose Project in Oceanside, California

Dear Mr. Ontiveros,

The proposed Modera Melrose Project consists of the construction of a 280-unit residential project on approximately 7.4-acre property covering two parcels (APNs 161-030-23-00 and 161-030-24-00) located at the southeast corner of Melrose Drive and West Bobier Drive in the City of Oceanside, California in northwest San Diego County. The project site falls within Section 13 of Township 11 South, Range 4 West, 3 West of the San Luis Rey, California 7.5-minute U.S. Geological Survey Topographic Quadrangle Map (Figure 1).

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April 13, 2022

13937

Mr. Isaiah Vivanco, Chairperson
Soboba Band of Luiseno Indians
P.O. Box 487
San Jacinto, CA 92581

Subject: Information Request for the Modera Melrose Project in Oceanside, California

Dear Mr. Vivanco,

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April 13, 2022

13937

Charlene Worrell-Elliott, Resource Specialist
Sycuan Band of the Kumeyaay Nation
1 Kwaaypaay Court
El Cajon, CA 92019

Subject: Information Request for the Modera Melrose Project in Oceanside, California

Dear Ms. Worrell-Elliott,

The proposed Modera Melrose Project consists of the construction of a 280-unit residential project on approximately 7.4-acre property covering two parcels (APNs 161-030-23-00 and 161-030-24-00) located at the southeast corner of Melrose Drive and West Bobier Drive in the City of Oceanside, California in northwest San Diego County. The project site falls within Section 13 of Township 11 South, Range 4 West, 3 West of the San Luis Rey, California 7.5-minute U.S. Geological Survey Topographic Quadrangle Map (Figure 1).

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April 13, 2022

13937

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

Subject: Information Request for the Modera Melrose Project in Oceanside, California

Dear Mr. Martinez,

The proposed Modera Melrose Project consists of the construction of a 280-unit residential project on approximately 7.4-acre property covering two parcels (APNs 161-030-23-00 and 161-030-24-00) located at the southeast corner of Melrose Drive and West Bobier Drive in the City of Oceanside, California in northwest San Diego County. The project site falls within Section 13 of Township 11 South, Range 4 West, 3 West of the San Luis Rey, California 7.5-minute U.S. Geological Survey Topographic Quadrangle Map (Figure 1).

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April 13, 2022

13937

Mr. John Christman, Chairperson
Viejas Band of Kumeyaay Indians
1 Viejas Grade Rd.
Alpine, CA 91901

Subject: Information Request for the Modera Melrose Project in Oceanside, California

Dear Mr. Christman,

The proposed Modera Melrose Project consists of the construction of a 280-unit residential project on approximately 7.4-acre property covering two parcels (APNs 161-030-23-00 and 161-030-24-00) located at the southeast corner of Melrose Drive and West Bobier Drive in the City of Oceanside, California in northwest San Diego County. The project site falls within Section 13 of Township 11 South, Range 4 West, 3 West of the San Luis Rey, California 7.5-minute U.S. Geological Survey Topographic Quadrangle Map (Figure 1).

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April 13, 2022

13937

Mr. Ernest Pingleton, Tribal Historic Officer
Viejas Band of Kumeyaay Indians
1 Viejas Grade Rd.
Alpine, CA 91901

Subject: Information Request for the Modera Melrose Project in Oceanside, California

Dear Mr. Pingleton,

The proposed Modera Melrose Project consists of the construction of a 280-unit residential project on approximately 7.4-acre property covering two parcels (APNs 161-030-23-00 and 161-030-24-00) located at the southeast corner of Melrose Drive and West Bobier Drive in the City of Oceanside, California in northwest San Diego County. The project site falls within Section 13 of Township 11 South, Range 4 West, 3 West of the San Luis Rey, California 7.5-minute U.S. Geological Survey Topographic Quadrangle Map (Figure 1).

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PECHANGA CULTURAL RESOURCES
Temecula Band of Luiseño Mission Indians

Post Office, Box 2183 • Temecula, CA 92593
Telephone (951) 770-6300 • Fax (951) 506-9491

April 15, 2022

VIA E-Mail and USPS

Keshia Montifolca, M.A., RPA
Archaeologist
DUDEK
605 Third Street,
Encinitas, CA. 92024

RE: Request for Information for the Modera Melrose Project, City of Oceanside, San Diego County, California.

Dear Ms. Montifolca,

The Pechanga Band of Indians ("the Tribe") appreciates your request for information regarding the above referenced Project. After reviewing the provided maps and our internal documents, we have determined that the Project area is not within Reservation land's, although it is located within Our Ancestral Territory. At this time, we are interested in participating in this Project based upon our 'Ayélkwish/Traditional Knowledge of the area, its proximity two Luiseño Traditional Cultural Properties, and this Project's under two-mile adjacency to five Ancestral Placename locations. Further, this Project is situated just under a mile from two ceremonial locations. Because of multiple nearby Ancestral-remains and considering the extensive previously recorded sites within this Project's-vicinity the Tribe therefore, is interested in participating in this Project. Pechanga believes the possibility for recovering subsurface resources, during ground-disturbing activities for the Project is extremely high.

The Tribe is dedicated to providing comprehensive cultural information to you and your firm for inclusion in the archaeological study as well as to the Lead Agency for CEQA review. At this time, the Tribe requests the following so we may continue the consultation process and to provide adequate and appropriate recommendations for the Project:

- 1) Notification once the Project begins the entitlement process, if it has not already;
- 2) Copies of all applicable archaeological reports, site records, proposed grading plans and environmental documents (EA/IS/MND/EIR, etc);
- 3) Government-to-government consultation with the Lead Agency; and
- 4) The Tribe believes that monitoring by a San Diego County qualified archaeologist and a professional Pechanga Tribal Monitor may be required during earthmoving activities. Therefore, the Tribe reserves its right to make additional comments and

Chairperson:
Neal Ibanez

Vice Chairperson:
Bridgett Barcello

Committee Members:
Darlene Miranda
Richard B. Searce, III
Robert Villalobos
Shevon Torres
Juan Rodriguez

Director:
Gary DuBois

Coordinator:
Paul Macarro

Cultural Analyst:
Tuba Ebru Ozdil

Planning Specialist:
Molly Escobar

recommendations once the environmental documents have been received and fully reviewed. Further, in the event that subsurface cultural resources are identified, the Tribe requests consultation with the Project proponent and Lead Agency regarding the treatment and disposition of all artifacts.

As a Sovereign governmental entity, the Tribe is entitled to appropriate and adequate government-to-government consultation regarding the proposed Project. We would like you and your client to know that the Tribe does not consider initial inquiry letters from project consultants to constitute appropriate government-to-government consultation, but rather tools to obtain further information about the Project area. Therefore, the Tribe reserves its rights to participate in the formal environmental review process, including government-to-government consultation with the Lead Agency, and requests to be included in all correspondence regarding this Project.

Please note that we are interested in participating in surveys within Luiseño Ancestral territory. Prior to conducting any surveys, please contact the Cultural Department to schedule specifics. If you have any additional questions or comments, please contact me at pmacarro@pechanga-nrn.gov or 951-770-6306.

Sincerely,

A handwritten signature in black ink that reads "Paul E. Macarro". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Paul E. Macarro
Cultural Coordinator
Pechanga Reservation

*Pechanga Cultural Resources • Temecula Band of Luiseño Mission Indians
Post Office Box 2183 • Temecula, CA 92592*

Sacred Is The Duty Trusted Unto Our Care And With Honor We Rise To The Need

SAN LUIS REY BAND OF MISSION INDIANS

*1889 Sunset Drive • Vista, California 92081
760-724-8505 • FAX 760-724-2172
www.slrmissionindians.org*

April 26, 2022

Keshia Montifolca, M.A., RPA
Archaeologist
Dudek

VIA ELECTRONIC MAIL
kmontifolca@dudek.com

**RE: SLR RESPONSE REGARDING THE PROPOSED MODERA MELROSE
PROJECT IN OCEANSIDE, CA AND ITS POTENTIAL IMPACTS TO
NATIVE AMERICAN TRIBAL CULTURAL RESOURCES**

Dear Ms.Montifolca:

We, the San Luis Rey Band of Mission Indians (“Tribe”) have received and reviewed your letter dated April 13, 2022 (and inclusive maps) regarding the proposed Modera Melrose Project in Oceanside, CA (“Project” and “Project Area”). We further understand from your letter that you are inquiring whether the Tribe possesses any information and/or concerns regarding tribal cultural resources and/or Sacred Lands in the Project Area.

We are a northern San Diego County Tribe traditionally and culturally affiliated with Camp Pendleton, the current cities of Oceanside, Carlsbad, Encinitas, Vista, San Marcos and Escondido, as well as many unincorporated areas within northern San Diego County, such as the communities of Fallbrook, Bonsall and Valley Center. We are resolute in the preservation and protection of tribal cultural resources within all these jurisdictions.

Our Tribe has intimate knowledge about the many discoveries made throughout the Project Area and is aware of cultural resource sites within close proximity to the proposed Project. We strongly urge caution in assessing the land encompassing the Project for any ground disturbing purposes, as well as incorporating the presence of a Luiseño Native American monitor during all ground disturbing activities (including but not limited to any and all boring activities) and cultural resource assessment surveys.

In regards to information our Tribe can provide Dudek regarding these tribal cultural resources and sacred sites within the Project Area, we respectfully request that any further discussion be done in person. Please contact our Cultural Resource Manager Cami Mojado at (760) 917-1736 or via email at cjmojado@slrmissionindians.org to arrange a mutually acceptable meeting date and time.

Furthermore, the Tribe requests that any and all cultural resource surveys completed in the Project Area and/or for the benefit of this Project be provided to the Tribe’s Cultural Department at 1889 Sunset Drive, Vista, CA 92081 as your earliest convenience. If digital copies

are available, please send them directly to cjmojado@slrmissionindians.org. If a cultural resource survey has not been completed as of today's date, then the Tribe respectfully requests that a Luiseño Native American monitor be present during any proposed survey of the Project property.

We appreciate this opportunity to provide information and/or share our concerns regarding this Project. We thank you for your assistance in protecting our invaluable Luiseño tribal cultural resources.

Sincerely,

Cami Mojado
Cultural Resource Manager
San Luis Rey Band of Mission Indians

Keshia Montifolca

From: buncelaw@aol.com
Sent: Friday, April 29, 2022 10:41 AM
To: Keshia Montifolca
Subject: Re: Failure Notice

Hello there,

It's the Modera Melrose project in Oceanside.

Art

-----Original Message-----

From: Keshia Montifolca <kmontifolca@dudek.com>
To: buncelaw@aol.com <buncelaw@aol.com>
Sent: Fri, Apr 29, 2022 10:27 am
Subject: RE: Failure Notice

Dear Mr. Bunce,

I received this message but did not receive all the information as it looks like the original message was rejected. May I please know which Project you are referring to?

I can forward your request to consult with the City of Oceanside as they are they lead agency and responsible for government to government consultation.

Sincerely,

Keshia Montifolca, M.A., RPA
Archaeologist

DUDEK

605 Third Street, Encinitas, CA 92024
O: 619.949.3082 C: 619.372.6255
www.dudek.com

From: buncelaw@aol.com <buncelaw@aol.com>
Sent: Friday, April 29, 2022 10:05 AM
To: Keshia Montifolca <kmontifolca@dudek.com>
Subject: Fwd: Failure Notice

-----Original Message-----

From: MAILER-DAEMON@aol.com
To: buncelaw@aol.com
Sent: Fri, Apr 29, 2022 9:52 am
Subject: Failure Notice

Sorry, we were unable to deliver your message to the following address.

<keshia.montifolca@dudek.com>:

550: 5.4.1 Recipient address rejected: Access denied. AS(201806281) [DM6NAM10FT047.eop-nam10.prod.protection.outlook.com]

----- Forwarded message -----

Dear Mr. or Ms. Montifolca,

The Barona Band of Mission Indians is a federally-recognized Indian tribe occupying the Barona Indian Reservation in rural San Diego County, in the traditional territory of the Kumeyaay people. I serve as its Tribal Attorney and often am the one who responds to cultural resource inquiries on behalf of Chairman Raymond Welch, who has succeeded Chairman Romero, who has retired. Your letter of April 13, 2022 regarding the above project has reached me for response.

Because the NAHC search was positive, I would like to request consultation under AB 25 with the City of Oceanside on behalf of the Barona Band regarding this project. I would like to know what the positive results were. If significant, more may be needed. Please let me know how you wish to proceed.

Sincerely,

Art Bunce
Tribal Attorney

Rincon Band of Luiseño Indians

CULTURAL RESOURCES DEPARTMENT

One Government Center Lane | Valley Center | CA 92082
(760) 749-1092 | Fax: (760) 749-8901 | rincon-nsn.gov



May 3, 2022

Sent via email: kmontifolca@dudek.com

Ms. Keshia Montifolca
DUDEK
605 Third Street
Encinitas, CA 92024

Re: Modera Melrose Project in Oceanside, California

Dear Ms. Montifolca,

This letter is written on behalf of the Rincon Band of Luiseño Indians (“Rincon Band” or “Tribe”), a federally recognized Indian Tribe and sovereign government. We have received your notification regarding the above referenced project and we thank you for the opportunity to provide information pertaining to cultural resources. The identified location is within the Traditional Use Area of the Luiseño people, and is also within Rincon Band’s specific Area of Historic Interest (AHI).

After review of the provided documents and our internal information, the Band has specific concerns that that the project may impact tangible Tribal Cultural Resources (TCRs), Traditional Cultural Landscapes (TCLs), and potential Traditional Cultural Properties (TCPs). Embedded in these resources and within the AHI are the Tribe’s history, culture, and continuing traditional identity.

Based on the information provided above, the Rincon Band recommends conducting an archaeological/cultural resources study, to include an archeological record search and complete intensive survey of the property. Additionally, we ask that a professional Tribal monitor from the Rincon Band to accompany the archaeologist during the survey.

The Rincon Band further requests to consult directly with the lead agency regarding project impacts to cultural resources. While it is not the responsibility of consultants to facilitate State-mandated consultation, the request is included in this letter so the lead agency is aware of the Tribe’s concerns about the project. If you have additional questions or concerns, please do not hesitate to contact our office at your convenience at (760) 749 1092 ext. 323 or via electronic mail at cmadrigal@rincon-nsn.gov. We look forward to working together to protect and preserve our cultural assets.

Sincerely,



Cheryl Madrigal
Tribal Historic Preservation Officer
Cultural Resources Manager

Bo Mazzetti
Chairman

Tishmall Turner
Vice Chair

Laurie E. Gonzalez
Council Member

John Constantino
Council Member

Joseph Linton
Council Member

