

## Appendix E-1

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### Public Cultural Resources and Tribal Cultural Resources Assessment Report



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# Cultural Resources Technical Report

## (Archaeological and Tribal Cultural Resources)

# San Diego State University

# Evolve Student Housing Project

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DECEMBER 2024

*Prepared for:*

**SAN DIEGO STATE UNIVERSITY**

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# Summary of Findings

This report presents the results of Dudek's cultural resources study for the San Diego State University (SDSU) Evolve Student Housing Project (Project), prepared pursuant to the requirements of the California Environmental Quality Act (CEQA). The Project includes the redevelopment of two proposed student housing complexes at two different locations, referred to as the Peninsula Component and the University Towers East Component, at and adjacent to SDSU's Main Campus, in the City of San Diego (City), California. The Board of Trustees of The California State University (CSU Trustees) will serve as lead agency under CEQA for the Project and ultimately consider the adequacy of the environmental impact report (EIR) prepared for the project. This study reviews the Project's potential to impact archaeological and tribal cultural resources. A separate study, *Historic Resources Technical Report: San Diego State University Evolve Student Housing Project, City of San Diego, California* (Ahmanson et al. 2024), reviewed potential Project impacts to built environment resources.

The Project area of potential effect (APE) encompasses the footprint of the Peninsula Component and the University Towers East Component. The Peninsula Component is located at the northwestern portion of the SDSU campus, south of Interstate-8 and west of Canyon Crest Drive. The Peninsula Component would include the demolition of all existing onsite buildings to allow for the development of a 2-story amenities building, a 9-story student housing building, and five student housing buildings up to 13 stories tall that would contain a total of approximately 4,450 new student beds and associated amenities. The University Towers East Component is located at 5505 Montezuma Road and would include the demolition of an existing parking lot to allow for the development of a new 9-story student housing building that would accommodate approximately 720 student beds. The Project APE falls within the Section 15 and 22 of Township 16 South, Range 2 West of the La Mesa, California 7.5-minute U.S. Geological Survey Topographic (USGS) Quadrangle Map.

In furtherance of its analysis, Dudek conducted a records search at the South Coastal Information Center (SCIC) for the Project APE and a surrounding 1-mile radius. The SCIC records search identified 111 cultural resource studies that have been previously conducted within 1 mile of the Project APE, seven of which intersect the Project APE (Confidential Appendix A). The records search also identified 52 previously identified cultural resources within the Project APE, one of which, CA-SDI-009899, intersects a portion of the Peninsula Component within the Project APE. CA-SDI-009899 consists of a light shell scatter and singular ground stone fragment found on the ground surface.

Separately, Dudek received the results of the Native American Heritage Commission (NAHC) search of the Sacred Lands File were received on August 27, 2024. The results were negative, indicating that no Native American resources have been reported within 1 mile of the Project APE. The NAHC results included a list of tribal representatives who may possess cultural knowledge of the Project APE. Dudek sent outreach letters via certified mail to all representatives named on the NAHC list on August 28, 2024. To date, Dudek has received only one written response from the NAHC outreach letters. In accordance with Assembly Bill (AB) 52, under CEQA the lead agency must consult with any/all Native American Tribes requesting consultation. Via certified mail, SDSU sent outreach letters to the NAHC provided distribution list of concerned Native American representatives on September 11, 2024. The San Pasqual Band of Mission Indians and the Sycuan Band of the Kumeyaay Nation requested consultation for the Project. Consultation is currently ongoing.

A Dudek archaeologist and a Kumeyaay Native American monitor conducted an intensive-level pedestrian cultural resources survey of the proposed Project APE on September 23, 2024. During the survey, the mapped boundary of CA-SDI-009899 was revisited, however, no cultural material was identified. The entire Project APE is largely

disturbed by the existing student housing complexes and associated parking lots. No additional cultural resources were identified within the Project APE.

Based on the records search results, archival research review, and pedestrian cultural resources survey, there is a low potential for uncovering unanticipated subsurface archaeological deposits during Project implementation. As noted above, previously referenced CA-SDI-009899 was revisited during the on-site survey, however, no cultural material was observed. Due to the developed nature of the adjacent area, steep slope, and dense vegetation coverage, there is a low potential of subsurface deposits being present within the mapped location of CA-SDI-009899 and, as noted, no additional artifacts or features were observed during the survey.

In light of the research results to date, no further archaeological review, including archaeological monitoring, is recommended as necessary. However, in the event that archaeological resources are identified by anyone during construction activities, ground disturbance will cease in the area and a qualified archaeologist, in consultation with the CSU Trustees and consulting Tribes, will evaluate the resource. If human remains are found, the County Coroner shall be immediately notified of the discovery in accordance with Section 7050.5 of the California Health and Safety Code.

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# 1 Introduction

The San Diego State University (SDSU) Evolve Student Housing Project (Project) includes the redevelopment of two proposed student housing complexes at two different locations, referred to as the Peninsula Component and the University Towers East Component, at SDSU's Main Campus, in the City of San Diego (City), California.

The Board of Trustees of The California State University (CSU Trustees), which is the State of California acting in its higher education capacity, is the lead agency responsible for certifying the adequacy and completeness of the EIR. As a requirement of the EIR, Dudek has completed this cultural resource inventory and related analysis for the proposed Project. This inventory reviewed archaeological and tribal cultural resources within the Project's area of potential effect (APE). Built environment resources, as opposed to archaeological or tribal cultural resources, are addressed in a separate report, *Historic Resources Technical Report: San Diego State University Evolve Student Housing Project, City of San Diego, California* (Ahmanson et al. 2024).

## 1.1 Regional and Local Setting

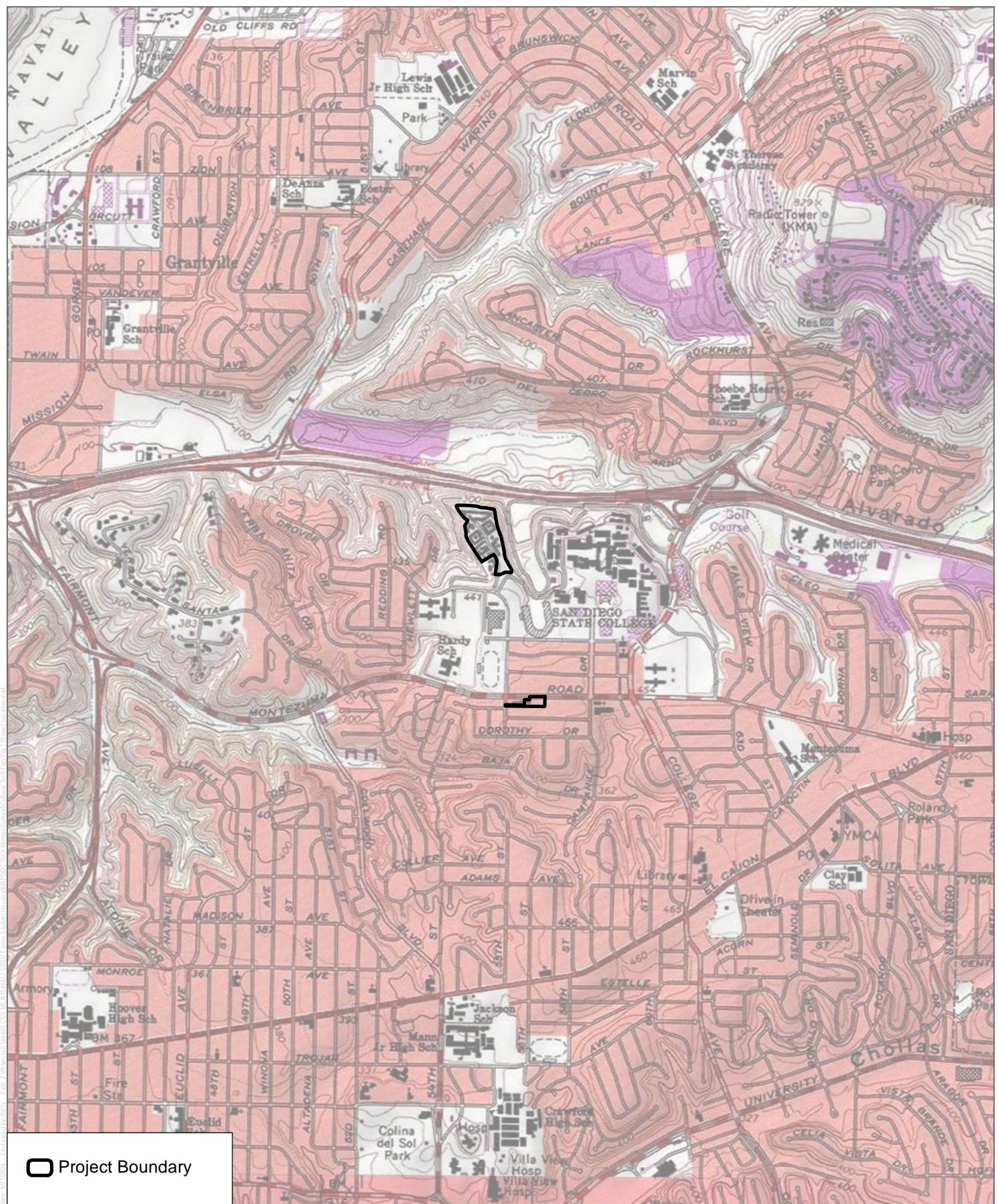
The Project APE is located in the northwestern, and southern-central portions of SDSU's Main Campus, approximately 8 miles east of downtown San Diego (Figure 1, Project Location). The Project APE is composed of two components, the Peninsula Component and the University Towers East Component. The Peninsula Component is located on a 10.3-acre area in the northwest portion of campus where 55th Street ends, south of Interstate 8, and west of Canyon Crest Drive. The Peninsula Component is bound by undeveloped canyon to the west, north, and east, and student housing buildings and Aztec Circle Drive to the south. The University Towers East Component is located on a 0.71-acre area on Montezuma Road that is currently utilized as a parking lot for University Towers at the address 5505 Montezuma Road. The University Towers East Component is bound by Montezuma Road to the north, University Towers student housing to the west, apartment style housing to the east, and Mary Lane Drive and single-family residential development to the south. The Project APE falls within Section 15 and 22 of Township 16 South, Range 2 West of the La Mesa, California 7.5-minute U.S. Geological Survey Topographic (USGS) Quadrangle Map.

## 1.2 Project Description

The Project APE consists of two proposed student housing complexes at two different locations, the Peninsula Component and the University Towers East Component, within SDSU's Main Campus (Figure 2, Area of Potential Effect Map). The Peninsula Component includes the phased development of one 9-story building and five buildings up to 13 stories that would contain a total of approximately 4,450 beds. The 9-story building would consist of double bed rooms, containing approximately 650 beds, and the other five up to 13-story buildings would be 4-bedroom apartment-style buildings containing approximately 760 beds each. The proposed redevelopment would also include a new two-story amenities building for student use and 15 parking spaces. The Peninsula Component would include outdoor gathering space and green space between each building.

The University Towers East Component involves the redevelopment of the existing site to include a new 9-story student-housing building that allows for approximately 720 beds. The University Towers East Component would also include a shared outdoor amenity space between the University Towers and proposed University Towers East buildings and a staff parking lot.

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SOURCE: USGS 7.5-Minute Series La Mesa Quadrangle; Township 16S; Range 2W; Sections 15 and 22

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FIGURE 1

## Project Location

Cultural Technical Memorandum for the SDSU Evolve Student Housing Project

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Project Boundary (APE)

SOURCE: USGS 7.5-Minute Series La Mesa Quadrangle; Township 16S; Range 2W; Sections 15 and 22

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0 200 400  
0 55 110  
Feet Meters

**FIGURE 2**  
**Area of Potential Effects (APE)**  
Cultural Technical Memorandum for the SDSU Evolve Student Housing Project

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## 2 Methodology

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

### 2.1 Records Search Methods

Dudek conducted a records search at the South Coastal Information Center (SCIC) for the Project APE and a surrounding 1-mile radius on September 4, 2024. The records search included review of mapped prehistoric, historical and built-environment resources, Department of Parks and Recreation (DPR) Site Records, technical reports, archival resources, and ethnographic references. Additional consulted sources included the California Inventory of Historical Resources/California Register of Historical Resources (CRHR) and Office of Historic Preservation Archaeological Determinations of Eligibility, California Points of Historical Interest, California Historical Landmarks, and California Department of Transportation (Caltrans) Bridge Survey information. Geographic information system (GIS) maps were produced illustrating the spatial relationship between known resources and possible Project impacts. Historical aerial maps were also consulted using the internet database [historicaerials.com](http://historicaerials.com). These maps were used to determine the development history of the area and to indicate any possible development from the historic era that could be encountered during the survey.

### 2.2 Field Methods

Dudek archaeologist Javier Hernandez conducted an intensive pedestrian cultural resources survey of the Project APE on September 23, 2024. Native American monitor Kenny Teeter, of Redtail Environmental, participated in the pedestrian survey. The survey and all personnel exceeded the applicable Secretary of Interior Professional Qualifications Standards for archaeological survey and evaluation. When possible, the survey team utilized transects spaced no more than 10 meters apart. When standardized transects were not possible due to dense vegetation, visual survey was utilized to search for exposed ground surfaces. The ground surface was examined, where possible, for prehistoric artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools, ceramics, fire-affected rock), soil discoloration that might indicate the presence of a cultural midden, soil depressions, features indicative of the current or former presence of structures or buildings (e.g., standing exterior walls, post holes, foundations), and historic artifacts (e.g., metal, glass, ceramics, building materials). Ground disturbances such as burrows, cut banks, and drainages were also visually inspected for exposed subsurface materials. The archaeologist used an Apple 3rd Generation iPad equipped with an 8 MP resolution camera, Global Positioning System (GPS) receiver, and Field Map software to ensure accurate survey of the proposed Project APE. Accuracy of the GPS receiver ranged between 3 meters and 10 meters. The archaeologist inspected natural and artificial erosion exposures, as well as spoils from rodent burrows as a means to locate evidence for buried cultural deposits.

### 2.3 Native American Correspondence

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

In *EPIC v. Johnson* (1985) 170 Cal.App. 3rd 604, the Court of Appeal held that the Native American Heritage Commission (NAHC), as a state agency with special expertise on tribal history, has jurisdiction over Native American resources that may be affected by proposed projects, including Native American burial sites and archaeological

places of religious significance to Native Americans. On behalf of SDSU, Dudek requested a search of the NAHC Sacred Land File on August 15, 2024, to determine if any tribal cultural resources are present within 1 mile of the Project APE.

Priscilla Torres-Fuentes, NAHC Cultural Resources Analyst, facilitated this search and returned the results on August 27, 2024. As part of the consultation process, the NAHC provided a list of tribal governments and individuals that should be contacted to solicit tribal knowledge about the Project APE. Dudek sent outreach letters via certified mail to all representatives listed on the NAHC list on August 28, 2024. To date, Dudek has received only one written response from the NAHC outreach letters. The results of the Sacred Lands File search and outreach letters are discussed in Section 3.5 of this document.

### Assembly Bill (AB) 52 Consultation

The Project is subject to compliance with AB 52 (California Public Resources Code [PRC], Section 21074), which requires consideration of impacts to tribal cultural resources as part of the CEQA process, and that the lead agency notify California Native American Tribal representatives (that have requested notification) who are traditionally or culturally affiliated with the geographic area of the proposed Project. Although no tribes previously requested such notice, SDSU, sent letters to all tribes included on the previously referenced NAHC list. The letters contained the following information: a project description and location description, a request for input relative to tribal cultural resources in the area, an outline of timing relative to the AB 52 process, an opportunity for consultation, and contact information for the appropriate tribal representative. CSU/SDSU and Native American consultation is ongoing.

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# 3 Existing Conditions

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

## 3.1 Existing Environmental Setting

The Project APE is located at SDSU's Main Campus and encompasses the footprint of the Peninsula Component and the University Towers East Component. Land uses adjacent to the Peninsula Component are undeveloped canyon to the west, north, and east; student housing buildings and Aztec Circle Drive to the south; and the Interstate-8 and the Metropolitan Transit (MTS) trolley to the north. Land uses adjacent to the University Towers East Component are Montezuma Road to the north, University Towers student housing to the west, apartment style housing to the east, and Mary Lane Drive and single-family residential development to the south.

The elevation of the proposed Project APE ranges between 400 feet and 465 feet above mean sea level. The proposed Project APE is primarily developed with the existing student housing complexes and associated parking lots. Overall ground visibility was poor (0-5%) throughout the entire Project APE, obscured by the existing development and dense vegetation.

## 3.2 Regulatory Setting

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

### 3.2.1 State

#### 3.2.1.1 California Environmental Quality Act

CEQA requires that all private and public activities not specifically exempted be evaluated for their potential to cause environmental impacts, including impacts to cultural resources, including archaeological, historical, and tribal cultural resources. Historical resources, which includes archaeological sites, are recognized as part of the environment under CEQA, which defines historical resources as, but 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" (Public Resources Code, Section 5020.1[j]). This report addresses the proposed Project's impacts relative to archaeological and tribal cultural resources. Built environment resources, such as man-made structures, are addressed in a separate report.

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

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.

2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

In 2014, CEQA was amended through the passage of Assembly Bill 52 (AB 52) to apply to tribal cultural resources as well. Specifically, California Public Resources Code Section 21074 provides as follows:

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

All unique archaeological resources are presumed to be historically or culturally significant for purposes of CEQA (CEQA Guidelines Section 15064.5(c)). A site or resource that does not meet the definition of "unique archaeological resource" is not considered significant under CEQA and need not be analyzed further (California Public Resources Code Section 21083.2(a); CEQA Guidelines Section 15064.5(c)(4)).

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

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

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

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

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

If these "preservation in place" options are not feasible, mitigation may be accomplished through data recovery (California Public Resources Code Section 21083.2(d); CEQA Guidelines Section 15126.4(b)(3)(C)). California

Public Resources Code Section 21083.2(d) states that “[e]xcavation as mitigation shall be restricted to those parts of the unique archaeological resource that would be damaged or destroyed by the project. Excavation as mitigation shall not be required for a unique archaeological resource if the lead agency determines that testing or studies already completed have adequately recovered the scientifically consequential information from and about the resource, if this determination is documented in the environmental impact report.”

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

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

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

## Protections for Human Remains

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

### 3.3 Cultural Context

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

As recognized by State Assembly Joint Resolution No. 60 (2001), the Kumeyaay Nation has occupied the southern California and Baja California region, including the City of San Diego's jurisdictional boundaries and the proposed Project's APE, far into antiquity. Should any Native American human remains be found in the City's jurisdictional boundaries, the NAHC is expected to designate a Most Likely Descendant from the Kumeyaay Nation. It is important to note that Kumeyaay aboriginal lifeways did not cease within San Diego County and Baja California at European contact. Protohistoric refers to the chronological trend of continued Native American aboriginal lifeways at the cusp of the recorded historic period in the Americas.

#### 3.3.1 Paleoindian (Pre-5500 BC)

Evidence for Paleoindian occupation in coastal Southern California is tenuous, especially considering the fact that the oldest dated archaeological assemblages look nothing like the Paleoindian artifacts from the Great Basin. One of the earliest dated archaeological assemblages in coastal Southern California (excluding the Channel Islands) derives from CA-SDI-4669/W-12, in La Jolla. A human burial from CA-SDI-4669 was radiocarbon dated to 9,590–9,920 years before present (95.4% probability) (Hector 1984). The burial is part of a larger site complex that contained more than 29 human burials associated with an assemblage that fits the Archaic profile (i.e., large amounts of ground stone, battered cobbles, and expedient flake tools). In contrast, typical Paleoindian assemblages include large-stemmed projectile points, high proportions of formal lithic tools, bifacial lithic reduction strategies, and relatively small proportions of ground stone tools. Prime examples of this pattern are sites that were studied by Davis (1978) on China Lake Naval Air Weapons Station near Ridgecrest, California. These sites contained fluted and unfluted stemmed points and large numbers of formal flake tools (e.g., shaped scrapers, blades). Other typical Paleoindian sites include the Komodo site (CA-MNO-679)—a multi-component fluted point site, and CA-MNO-680—a single component Great Basined Stemmed point site (Basgall et al. 2002). At CA-MNO-679 and CA-MNO-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 notions of mobile hunter-gatherers traversing the landscape for highly valued prey. Evidence for the latter—that is, typical Paleoindian assemblages—may have been located along the coastal margin at one time, prior to glacial desiccation and a rapid rise in sea level during the early Holocene (pre-7,500 BP) that submerged as much as 1.8 kilometers of the San Diego coastline. If this were true, however, it would also be expected that such sites would be located on older landforms near the current coastline. Some sites, such as CA-SDI-210 along Agua Hedionda Lagoon, contained stemmed points similar in form to Silver Lake and Lake Mojave projectile points (pre-8,000 BP) that are commonly found at sites in California's high desert (Basgall and Hall 1990). CA-SDI-210 yielded one corrected radiocarbon date of 8,520–9,520 BP (Warren et al. 2004).

However, sites of this nature are extremely rare and cannot be separated from large numbers of milling tools that intermingle with old projectile point forms.

Warren et al. (2004) claimed that a biface manufacturing tradition present at the Harris site complex (CA-SDI-149) is representative of typical Paleoindian occupation in the San Diego region that possibly dates between 10,365 and 8,200 BC (Warren et al. 2004, p. 26). Termed San Dieguito (Rogers 1945), assemblages at the Harris site are qualitatively distinct from most others in the San Diego region because the site has large numbers of finely made bifaces (including projectile points), formal flake tools, a biface reduction trajectory, and relatively small amounts of processing tools (Warren 1964, 1968). Despite the unique assemblage composition, the definition of San Dieguito as a separate cultural tradition is hotly debated. Gallegos (1987) suggested that the San Dieguito pattern is simply an inland manifestation of a broader economic pattern. Gallegos' interpretation of San Dieguito has been widely accepted in recent years, in part because of the difficulty in distinguishing San Dieguito components from other assemblage constituents. In other words, it is easier to ignore San Dieguito as a distinct socioeconomic pattern than it is to draw it out of mixed assemblages.

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

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

### 3.3.2 Archaic (8000 BC-AD 500)

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

The Archaic pattern is relatively easy to define with assemblages that consist primarily of processing tools: milling stones, hand stones, battered cobbles, heavy crude scrapers, incipient flake-based tools, and cobble-core reduction. These assemblages occur in all environments across the San Diego region, with little variability in tool composition. Low assemblage variability over time and space among Archaic sites has been equated with cultural conservatism (Byrd and Reddy 2002; Warren 1968; Warren et al. 2004). Despite enormous amounts of archaeological work at Archaic sites, little change in assemblage composition occurs until the bow and arrow is adopted at around AD 500, as well as ceramics at approximately the same time (Griset 1996; Hale 2009). Even then, assemblage formality remains low. After the bow is adopted, small arrow points appear in large quantities

and already low amounts of formal flake tools are replaced by increasing amounts of expedient flake tools. Similarly, shaped milling stones and hand stones decrease 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, complimented only by the addition of the bow and ceramics.

### 3.3.3 Late Prehistoric (AD 500-1750)

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

Temporal trends in socioeconomic adaptations during the Late Prehistoric period are poorly understood. This is partly due to the fact that the fundamental Late Prehistoric assemblage is very similar to the Archaic pattern but includes arrow points and large quantities of fine debitage from producing arrow points, ceramics, and cremations. The appearance of mortars and pestles is difficult to place in time because most mortars are on bedrock surfaces; bowl mortars are actually rare in the San Diego region. Some argue that the Ethnohistoric intensive acorn economy extends as far back as AD 500 (Bean and Shipek 1978). However, there is no substantial evidence that reliance on acorns, and the accompanying use of mortars and pestles, occurred prior to AD 1400. True (1980) argued that acorn processing and ceramic use in the northern San Diego region did not occur until the San Luis Rey pattern emerged after approximately AD 1450. For southern San Diego County, the picture is less clear. The Cuyamaca Complex is the southern counterpart to the San Luis Rey pattern, however, and is most recognizable after AD 1450 (Hector 1984). Similar to True (1980), Hale (2009) argued that an acorn economy did not appear in the southern San Diego region until just prior to Ethnohistoric times, and that when it did occur, a major shift in social organization followed.

### 3.3.4 Ethnohistoric (Post-AD 1750)

As recognized by State Assembly Joint Resolution No. 60 (2001), the Kumeyaay Nation has occupied the southern California and Baja California region, including the City of San Diego's jurisdictional boundaries and the proposed project's APE, far into antiquity. The history of the Kumeyaay communities prior to the mid-1700s has largely been reconstructed through later mission-period and early ethnographic accounts. The first records of the Native American inhabitants of the San Diego region come predominantly from European merchants, missionaries, military personnel, and explorers. These brief, and generally peripheral, accounts were prepared with the intent of furthering respective colonial and economic aims and were combined with observations of the landscape. They were not intended to be unbiased accounts regarding the cultural structures and community practices of the newly encountered cultural groups. The establishment of the missions in the San Diego region brought more extensive documentation of Native American communities, though these groups did not become the focus of formal and in-

depth ethnographic study until the early twentieth century (Boscana 1846: Fages 1937: Geiger and Meighan 1976: Harrington 1934: Laylander 2000). The principal intent of these researchers was to record the precontact, culturally specific practices, ideologies, and languages that had survived the destabilizing effects of missionization and colonialism. This research, often understood as “salvage ethnography,” was driven by the understanding that traditional knowledge was being lost due to the impacts of modernization and cultural assimilation. Alfred Kroeber applied his “memory culture” approach (Lightfoot 2005, p. 32) by recording languages and oral histories within the San Diego region. Kroeber’s 1925 assessment of the impacts of Spanish missionization on local Native American populations supported Kumeyaay traditional cultural continuity (Kroeber 1925, p. 711):

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

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

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

In 1769, the Kumeyaay national territory started at the coast about 100 miles south of the Mexican border (below Santo Tomas), thence north to the coast at the drainage divide south of the San Luis Rey River including its tributaries. Using the U.S. Geological Survey topographic maps, the boundary with the Luiseño then follows that divide inland. The boundary continues on the divide separating Valley Center from Escondido and then up along Bear Ridge to the 2,240 contour line and then north across the divide between Valley Center and Woods Valley up to the 1,880-foot peak, then curving around east along the divide above Woods Valley. [1993, as summarized by the San Diego County Board of Supervisors 2007:6]

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

Victor Golla has contended that one can interpret the amount of variability within specific language groups as being associated with the relative “time depth” of the speaking populations (Golla 2007, p. 80) A large amount of variation within the language of a group represents a greater time depth than a group’s language with less internal diversity. One method that he has employed is by drawing comparisons with historically documented changes in Germanic and Romantic language groups. Golla has observed that the “absolute chronology of the internal diversification

within a language family" can be correlated with archaeological dates (2007, p. 71). This type of interpretation is modeled on concepts of genetic drift and gene flows that are associated with migration and population isolation in the biological sciences.

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

At maturity, tribal members often left to other bands in order to find a partner. The families formed networks of communication and exchange around such partnerships. The Kumeyaay generally lived in smaller family subgroups that would inhabit two or more locations over the course of the year. While less common, there is sufficient evidence that there were also permanently occupied villages, and that some members may have remained at these locations throughout the year (Owen 1965; Shipek 1982, 1985; Spier 1923). The prehistoric village of *Nipawai/Nipaguay* was located at the bend in the San Diego River where Kumeyaay occupants could utilize the riverine resources and dam channels to redirect water to facilitate plant husbandry (Shipek 1993). As its epicenter is located only 0.5 miles east, there is an increased probability that cultural resources identified within the proposed project APE would be associated with *Nipawai/Nipaguay*. Each autonomous triblet was internally socially stratified, commonly including higher status individuals such as a tribal head (Kwaaypay), shaman (Kuseyaay), and general members with various responsibilities and skills (Shipek 1982). Higher-status individuals tended to have greater rights to land resources, and owned more goods, such as shell money and beads, decorative items, and clothing. To some degree, titles were passed along family lines; however, tangible goods were generally ceremonially burned or destroyed following the deaths of their owners (Luomala 1978). Remains were cremated over a pyre and then relocated to a cremation ceramic vessel that was placed in a removed or hidden location. A broken metate was commonly placed at the location of the cremated remains, with the intent of providing aid and further use after death. Should any Native American human remains be found in the City of San Diego's jurisdictional boundaries, including the proposed project's APE, the NAHC is expected to designate a Most Likely Descendant from the Kumeyaay Nation.

Areas or regions, identified by known physical landmarks, could be recognized as band-specific territories that may be violently defended against use by other members of the Kumeyaay. Other areas or resources, such as water sources and other locations that were rich in natural resources, were generally understood as communal land to be shared amongst all the Kumeyaay (Luomala 1978). The coastal Kumeyaay would have procured shellfish from

three primary environments, including the sandy open coast, bay and lagoon, and rocky open coast (Luomala 1978). The availability of these marine resources changed with the rising sea levels, siltation of lagoon and bay environments, changing climatic conditions, and intensity of use by humans and animals (Gallegos and Kyle 1988; Pigniolo 2005; Warren and Pavesic 1963). Shellfish from sandy environments included *Donax* sp., *Saxidomus* spp., *Tivela* spp., and others. Rocky coast shellfish dietary contributions consisted of *Pseudochama* sp., *Megastrea* spp., *Saxidomus* spp., *Prototthaca* spp., *Megathura* spp., and others. Lastly, the bay environment would have provided *Argopecten* spp., *Chione* spp., *Ostrea* spp., *Neverita* spp., *Macoma* spp., *Tagelus* spp., and others. While marine resources were obviously consumed, terrestrial animals and other resources likely provided a large portion of sustenance. Game animals consisted of rabbits, hares (*Leporidae*), birds, ground squirrels, woodrats (*Neotoma* spp.), deer, bears, mountain lions (*Puma concolor*), bobcats (*Lynx rufus*), coyotes (*Canis latrans*), and others. In lesser numbers, reptiles and amphibians may have been consumed.

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

The Kumeyaay territory spans over several distinct ecological zones and intra-tribal trade allowed the dispersal of goods and information. The Kumeyaay usually trade between bands more often than they traded with unrelated groups outside of their territory, however, larger trail systems crossed their land from the Lower Colorado River to the Southern Californian coast (Luomala 1978). The coastal Kumeyaay exchanged a number of local goods, such as seafood, coastal plants, and various types of shell for items including acorns, agave, mesquite beans, gourds, and other more interior plants of use (Luomala 1978). Trade routes were often along trails between villages, along waterways such as the San Diego River, or, in desert terrain, between springs and water catchments (Heizer 1978). Spaniards marveled at how quickly news and goods travelled between the Colorado River and the coast along the Kumeyaay trail system (Heizer 1978). The routes of the Kumeyaay trail system were followed by wagon routes and later became major thoroughfares (Davis 1961). Interstate 8 is today aptly named the “Kumeyaay Highway” as it follows the likely path of the prehistoric trail connecting coastal and inland Kumeyaay. The proposed project APE is located along the Kumeyaay Highway and the San Diego River between the prehistoric villages of *Kosoi/Kosay/Kosaii/Cosoy/Kosa'aay* and *Nipawai/Nipaguay*, the location of the Old Town Presidio (4 miles west) and the Mission San Diego de Alcalá (.5 miles east), respectively (Kroeber 1925).

### 3.3.5 The Historic Period (Post-AD 1542)

European activity in the region began as early as AD 1542, when Juan Rodríguez Cabrillo landed in San Diego Bay. Sebastián Vizcaíno returned in 1602, and it is possible that there were subsequent contacts that went unrecorded. These brief encounters made the local native people aware of the existence of other cultures that were technologically more complex than their own. Epidemic diseases may also have been introduced into the region at an early date, either by direct contacts with the infrequent European visitors or through waves of diffusion emanating from native peoples farther to the east or south (Preston 2002). It is possible, but as yet unproven, that the precipitous demographic decline of native peoples had already begun prior to the arrival of Gaspar de Portolá and Junípero Serra in 1769.

Spanish colonial settlement was initiated in 1769, when multiple expeditions arrived in San Diego by land and sea, and then continued northward through the coastal plain toward Monterey. A military presidio and a mission were soon firmly established at San Diego, despite violent resistance to them from a coalition of local Kumeyaay native communities. In 1774, the Spanish missionaries reestablished the Mission of San Diego de Alcalá up the San Diego River to its current location in Mission Valley in order to be closer to a more reliable water source (Hill 2002). The Mission of San Diego de Alcalá was built at the location of the ethnohistoric Kumeyaay village of *Nipawai/Nipaguay*, located 0.5 miles west of the proposed project APE. The missionaries relied heavily on Kumeyaay labor and resources extracted from Nipawai/Nipaguay. Private ranchos subsequently established by Spanish and Mexican soldiers, as well as other non-natives, appropriated much of the remaining coastal or near-coastal locations (Pourade 1960–1967).

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

The American Period began in 1846 when United States military forces occupied San Diego and this period continues today. When United States military forces occupied San Diego in July 1846, the town's residents split on their course of action. Many of the town's leaders sided with the Americans, while other prominent families opposed the United States invasion. In December 1846, a group of Californios under Andres Pico engaged United States Army forces under General Stephen Kearney at the Battle of San Pasqual and inflicted many casualties. However, the Californio resistance was defeated in two small battles near Los Angeles and effectively ended by January 1847. The Americans assumed formal control with the Treaty of Guadalupe Hidalgo in 1848 and introduced Anglo culture and society, American political institutions and especially American entrepreneurial commerce. In 1850, the Americanization of San Diego began to develop rapidly.

On February 18, 1850, the California State Legislature formally organized San Diego County. The first elections were held at San Diego and La Playa on April 1, 1850, for county officers. San Diego grew slowly during the next decade. San Diegans attempted to develop the town's interests through a transcontinental railroad plan and the development of a new town closer to the bay. The failure of these plans, added to a severe drought that crippled ranching and the onset of the Civil War, left San Diego as a remote frontier town. The troubles led to an actual drop in the town's population from 650 in 1850 to 539 in 1860. Not until land speculator and developer Alonzo Horton arrived in 1867 did San Diego begin to develop fully into an active American town.

Alonzo Horton's development of a New San Diego (modern downtown) in 1867 began to swing the community focus away from Old Town and began the urbanization of San Diego. Expansion of trade brought an increase in the availability of building materials. Wood buildings gradually replaced adobe structures. Development spread from downtown based on a variety of factors, including the availability of potable water and transportation corridors. During the Victorian Era of the late 1800s and early 1900s, the areas of Golden Hill, Uptown, Banker's Hill, and Sherman Heights were developed.

San Diego State University was established in 1897 as a normal school located on Normal Street. The institution moved to its current site in the college area in 1931. Development of the state college area began then and the development of the Navajo Community Plan grew from the college area from the west. There was farming and

ranching in Mission Valley until the middle portion of the twentieth century, when the uses were converted to commercial and residential. There were dairy farms and chicken ranches adjacent to the San Diego River where now there are motels, restaurants, office complexes and regional shopping malls. There was little development north of the San Diego River until Linda Vista was developed as military housing in the 1940s. The federal government improved public facilities and extended water and sewer pipelines to the area. From Linda Vista, development spread north of Mission Valley to the Clairemont Mesa and Kearny Mesa areas. Development in these communities was mixed use and residential on moderate size lots.

## 3.4 Archaeological Inventory

### 3.4.1 Previously Conducted Cultural Resources Studies

The SCIC records search identified 111 cultural resource studies have been previously conducted within a 1-mile radius of the Project APE (Confidential Appendix A). Of these previous studies, seven intersect the APE (Table 1). Of the seven, the studies included four cultural resources studies, one archaeological and historical study, one archaeological resource analysis, and historical background information. These previous studies identified one previously recorded cultural resource, CA-SDI-009899 within the Project APE.

**Table 1. Previously Conducted Cultural Studies within the Project APE**

Report No.	Year	Publisher	Title
SD-02538	1992	ROTH AND ASOCIATES	CULTURAL RESOURCES SURVEY COLLEGE AREA REDEVELOPMENT PROJECT EIR 131.4 ACRES
SD-09697	2004	BRIAN F. SMITH AND ASSOCIATES	AN ARCHAEOLOGICAL/HISTORICAL STUDY FOR THE SDSU 2005 CAMPUS MASTER PLAN REVISION
SD-11185	2007	BRIAN F. SMITH AND ASSOCIATES	A CULTURAL RESOURCES STUDY FOR THE SDSU 2007 CAMPUS MASTER PLAN REVISION
SD-11265	N.D.	-	SAN DIEGO STATE UNIVERSITY, 5300 CAMPANILE DRIVE, SAN DIEGO, CALIFORNIA 92182
SD-11826	2008	AFFINIS	ARCHAEOLOGICAL RESOURCES ANALYSIS FOR THE MASTER STORMWATER SYSTEM MAINTENANCE PROGRAM, SAN DIEGO, CALIFORNIA PROJECT. NO. 42891
SD-14427	2012	ACE ENVIRONMENTAL, INC.	CULTURAL RESOURCE RECORDS SEARCH AND SITE SURVEY AT&T SITE SD0775 MONTEZUMA (COX ARENA) 5505 MONTEZUMA ROAD SAN DIEGO, SAN DIEGO COUNTY, CALIFORNIA 92115
SD-17234	2017	BCR Consulting LLC	CULTURAL RESOURCES ASSESSMENT OF THE MISSION CONTROL, BLUE CYPRESS, LAKE MURRAY AND CASO SERRA PROJECT, SAN DIEGO COUNTY, CALIFORNIA (BCR CONSULTING PROJECT NO. SYN1514)

### 3.4.2 Previously Identified Cultural Resources

The SCIC records search also identified 52 previously recorded cultural resources within the 1-mile radius of the Project APE (Confidential Appendix A). Of the 52 resources, one prehistoric resource, CA-SDI-009899 was identified within the southeastern portion of the Peninsula Component of the Project APE (Table 2). CA-SDI-009899 consists

of a light shell scatter and a singular ground stone fragment. The remaining previously recorded resources consist of 43 historic buildings, two historic refuse scatters, an isolated historic bottle, three prehistoric bedrock milling sites, one isolated prehistoric lithic core, and one unknown resource with no description in its site record. The records search did not identify any historic addresses within the Project APE.

**Table 2. Previously Identified Cultural Resources within the Project APE**

Primary No.	Trinomial	Period	Description	Project Proximity
P-37-009899	CA-SDI-009899	Prehistoric	Lithic and shell scatter	Inside the APE

### 3.4.2.1 CA-SDI-009899

CA-SDI-009899 is a small prehistoric site originally recorded by CRM Center in 1984 (Kidder and Miller 1984). The site consists of a light shell scatter and one ground stone fragment. The ground stone fragment consists of a portable milling stone measuring 23 x 20 x 12 cm and containing one milling surface. Disturbances include disturbed soil evidenced by the construction activity for the paved parking lot. The original site record states that the shell scatter may have been introduced as fill by adjacent construction. Vegetation included mixed chapparal and the soil consisted of conglomerate and redeposited fill sediments from the construction of the parking lot.

### 3.4.3 Aerial Photograph Analysis

Historic aerial photographs of the proposed Project APE were reviewed at [historicaerials.com](http://historicaerials.com) in order to assess land use and development changes over time (NETR 2024). Historic aerial photographs of the Project APE are available since 1953. The aerial imagery from 1953 shows the Peninsula Component as undeveloped with a single pedestrian trail bisecting the Project component and the University Towers East Component as undeveloped and graded from previous residential development. Additionally, the aerial imagery shows the development of San Diego State University and residential housing within the general vicinity of the Project APE. By 1964, the aerial imagery shows the Peninsula Component as developed with the existing student housing buildings and one parking lot. There are no substantial changes to the University Towers Component in the 1964 aerial imagery. The aerial imagery from 1966 reveals development of an additional building within the southern portion of the Peninsula Component and the development of a parking lot in the University Towers East Component and the currently existing University Towers housing complex. There is a steady increase of residential and commercial properties within the general vicinity of the Project APE. Between 1968 to 1993 there are no substantial changes to the Peninsula Component or the University Towers East Component. By 1993 the aerial imagery reveals the development of a building on the southeast corner of the Peninsula Component. There are no substantial changes in the University Towers East Component. By 2009 the aerial imagery reveals additional development of a building on the southeast corner of the Peninsula Component. There are no substantial changes in the University Towers East Component.

Historic topographic (topo) maps of the Project APE were reviewed (earliest map available is 1903). The historic topo map from 1942 shows San Diego State University, Interstate-8, Montezuma Road, and Valley Road as developed. The 1959 topo imagery shows the University Towers East Component as developed with roadways. The 1969 topo imagery shows the Peninsula Component as developed with buildings.

Overall, the review of historic topographic maps and historic aerial photographs indicate the majority of the Project APE is currently being used as SDSU's student housing and parking lots. This review also indicated the Peninsula

Component has been developed since 1964 and the University Towers East Component has been disturbed by past grading since 1953.

### 3.4.4 Intensive Pedestrian Survey Results

The intensive pedestrian survey was conducted by Dudek archaeologist Javier Hernandez on September 23, 2024. Red Tail Environmental Native American monitor Kenny Teeter participated in the survey. The Project APE has been largely disturbed by years of development of SDSU's Main Campus. Ground visibility of the University Towers East Component, located at 5505 Montezuma Road was poor (0-5%) and completely obscured by existing development of the student housing complexes and associated parking lot (Exhibit 1).

Ground visibility of the Peninsula Component, located north of Aztec Circle Drive and 55<sup>th</sup> Street also was poor (0-5%) in areas where ground surface was obscured by existing development, roadways, and associated parking lots (Exhibit 2). Disturbances throughout the Peninsula Component include both underground and above-ground utilities and fencing. The Peninsula Component includes a small, undeveloped, sloped area leading to the drainages surrounding the developed terrace. However, the ground visibility is poor (0-5%) within this undisturbed area due to dense vegetation (Exhibit 3). This undeveloped slope is also the previously recorded location of CA-SDI-009899.

The previously recorded resource, CA-SDI-009899, is located within the southeastern portion of the Peninsula Component. Approximately 40% of the resource intersects the Project APE, while the remaining portion is situated on an eastern facing slope (Confidential Appendix B). During the pedestrian survey, the mapped boundary of CA-SDI-009899 was revisited, however, no cultural material was identified. Ground visibility within the mapped boundary of the resource was obscured by dense vegetation and dead foliage (Exhibit 3). The soil consisted of gray silty loam with 20% cobbles. Disturbances include modern debris (food/beverage trash) along the slope. Due to the developed nature of the adjacent area, steep slope, and dense vegetation, there is a low chance of subsurface deposits being present. No additional cultural resources were identified within the Project APE.

**Exhibit 1.** Overview of University Towers East Component, facing Northwest.



**Exhibit 2.** Overview of the Peninsula Component, facing South.



**Exhibit 3.** Overview of dense vegetation covering the eastern facing slope at CA-SDI-009899, facing North.



### 3.5 Native American Heritage Commission Sacred Lands File and Native American Correspondence

The results of the NAHC search of the Sacred Lands File (SLF) via email on August 27, 2024, were negative. The SLF consists of a database of known Native American resources. As part of the process, the NAHC provided a list of tribal representatives who may possess tribal knowledge of the APE (Appendix C).

In response, Dudek sent outreach letters by mail to all representatives listed on the NAHC list on August 28, 2024. As of October 2024, Dudek has received only one written response from the NAHC outreach letters. Angelina Gutierrez, Monitor Supervisor for the San Pasqual Band of Mission Indians, wrote a response letter to Dudek indicating that the Project is not within the boundaries of the recognized San Pasqual Indian Reservation. However, San Pasqual stated that they would like to engage in formal government-to-government consultation under Section 106 so that San Pasqual can have a voice developing the measures that will be taken to protect these sites and mitigate any adverse impacts. Dudek responded to the letter stating that the outreach was not an invitation for government-to-government consultation and that the CSU Trustees was conducting all tribal consultation. San Pasqual also requested access to any cultural resource reports that have been or will be generated during the environmental review. San Pasqual has been placed on a distribution list for this report. San Pasqual stated that they can provide a Native American Monitor for this Project. Ms. Gutierrez did not indicate if there are any tribal cultural resources within the Project APE. The NAHC SLF results and Native American Correspondence are included in Appendix C.

In response to the San Pasqual correspondence, SDSU representatives contacted Ms. Gutierrez to schedule a meeting/consultation. As of this writing, the meeting has not yet taken place. On November 4, 2024, SDSU representatives were informed that Bernice Paipa, Cultural Resource Specialist for the Sycuan Band of the Kumeyaay Nation and a representative of the Kumeyaay Cultural Repatriation Committee (KCRC), expressed interested in the Project. On December 6, 2024, SDSU representatives and the Sycuan Band attended a pre-consultation meeting and requested a site walk. Ms. Paipa also let SDSU representatives know that Daniel Tsosie, Tribal Historic Preservation Officer from the Campo Band of Diegueño Mission Indians, also expressed interest in the Project and may request consultation on the Project. The site visit with Sycuan and SDSU representatives commenced on December 10, 2024, and no additional requests were made during the site visit, aside from a follow-up consultation request. Consultation is currently ongoing

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## 4 Thresholds of Significance

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

1. Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5.
2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5.
3. Disturb any human remains, including those interred outside of dedicated cemeteries.

Under CEQA Guidelines section 15064.5, a project with an effect that may cause a substantial adverse change in the significance of an historical resource [including a unique archaeological resource] is a project that may have a significant effect on the environment. Substantial adverse change 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:

4. 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
5. 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
6. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a lead agency for purposes of CEQA.

(CEQA Guidelines Section 15064.5(b)).

Likewise, the significance of impacts to tribal cultural resources must also be determined. Based on Appendix G, the proposed project would result in a potentially significant impact to tribal cultural resources if the project would cause a substantial adverse change in the significance of a tribal cultural resource, defined in California Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:

1. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of the Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

California Public Resources Code Section 21074(a) defines tribal cultural resources as one of the following:

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

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# 5 Impact Analysis

## 5.1 Project Impacts

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

### Construction/Temporary Impacts

#### Direct Impacts

The SCIC identified one previously recorded cultural resource, CA-SDI-009899, intersecting the Project APE. CA-SDI-009899 consists of a light shell scatter and singular ground stone fragment. Approximately 40% of the resource's boundary intersects the southeastern portion of the Peninsula Component within the Project APE, while the remaining portion is situated on an eastern facing steep slope, outside of the Project APE. The portion of CA-SDI-009899 located within the Project APE was revisited during the intensive-level pedestrian cultural resources survey, however, no cultural material was observed. Any potential resource will have been substantially disturbed by prior development of the student housing complexes and associated parking lot. Due to the disturbances of the surrounding area, steep slope, and dense vegetation within the mapped boundary of the resource, it is unlikely that the site contains intact subsurface archaeological deposits. For that reason, Dudek does not recommend archaeological and Native American monitoring during construction activities.

However, there is a low potential for construction activity related to the proposed Project to uncover previously unidentified archaeological resources. Should construction activities disturb any archaeological or tribal cultural resources material within the Project APE, the Project would result in potentially significant impacts. Therefore, mitigation is provided (see **MM-CUL-1** in Section 6, Mitigation Measures) that would require construction activities to stop upon the discovery of a potentially unique archaeological resource and that a qualified archaeologist examine the find and, if warranted, direct that appropriate steps be taken to mitigate any potential significant impacts. With implementation of the measure, potential impacts to archaeological resources would be reduced to **less than significant**.

#### Indirect Impacts

As previously noted, the SCIC identified one previously recorded resource, CA-SDI-009899, intersecting the Project APE. No additional cultural resources were identified within the Project APE. Additionally, the NAHC Sacred Lands File results were negative.

Construction activities within the APE would not indirectly impact surrounding archaeological resources beyond those potential direct impacts previously identified as no resources have been identified along the steep slopes surrounding the Project APE. As such, construction would **not result in significant indirect impacts** to archaeological resources.

### Operational/Permanent Impacts

Once construction is complete, operation of the Project would not have a direct impact to previously identified archaeological resources since any discovery would have been identified and properly mitigated during construction

activities. Because the Project APE has been substantially developed and the new development is within the existing development footprint, the Project would not increase access to surrounding undeveloped area and Project operation would pose no additional risk of impacts to unknown archaeological resources in the Project vicinity. After construction is finished, operational/permanent activities would **not result in significant impacts** to archaeological resources.

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

## Construction/Temporary Impacts

### Direct Impacts

No known human remains localities were identified through the SCIC records search, NAHC Sacred Lands File results, or through intensive pedestrian survey of the Project APE. As such, Dudek does not recommend archaeological and Native American monitoring occur during construction activities. However, in the event construction or other personnel encounter any previously undocumented human remains during construction activities, the proposed Project would result in a **potentially significant** impact. Therefore, mitigation is provided that would reduce any potential impacts to less than significant (see **MM-CUL-2** in Section 6, Mitigation Measures).

### Indirect Impacts

As noted, no known human remains localities were identified through the SCIC records search, NAHC Sacred Lands File results, or through the intensive pedestrian survey of the Project APE. Further, because the Project APE has been substantially developed, it is unlikely that undiscovered buried human remains exist within the Project APE. Because the Project APE is situated on a hilltop previously developed and surrounded by steep hillsides, Project construction would pose little risk to undiscovered human remains in the Project vicinity beyond those potential impacts previously identified. Any construction activities related to the proposed Project would **not have an indirect impact** on previously recorded human remains.

## Operational/Permanent Impacts

As noted, no known human remains were identified through the SCIC records search, NAHC Sacred Lands File, or through intensive pedestrian survey of the Project APE. Operational/permanent activities related to the Project would **not have a direct impact** to previously identified human remains since they would have been identified and properly mitigated during construction activities). Because the Project APE is situated on levelled hilltop surrounded by steep hillsides, Project operational/permanent activities would not increase access or pose additional risk to human remains in the Project vicinity. Operational/permanent activities related to the proposed Project would **not have an indirect impact** on previously recorded human remains.

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

There is a low potential for the proposed project to result in, or contribute to, a cumulative impact relative to cultural resources within the City of San Diego (City). As previously noted, the SCIC identified one previously recorded resource, CA-SDI-009899 intersecting the Project APE. The intensive-level pedestrian survey revisited the mapped boundary of CA-SDI-009899 and no cultural resources were observed. No additional cultural resources were identified within the Project APE. Additionally, the NAHC Sacred Lands File results were negative.

Further, the Project APE has been substantially developed and the only undeveloped land surrounding the Project APE consists of very steep hillsides with low potential for cultural resources. The highly developed nature of the surrounding area and the low potential for cultural resources within the undeveloped portion of the Project APE present a low potential for the proposed project to result in or contribute to cumulative impacts to cultural resources. As such, Project implementation would **not result in significant cumulative impacts**.

*Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape, that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: (1) listed or eligible for listing in the California Register of Historical Resources (CRHR), or in the local register of historical resources as defined in Public Resources Code Section 5020.1 (k), or a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of the Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.*

No CRHR-listed or eligible historical resources have been identified through the SCIC records search or through intensive pedestrian survey of the APE. The APE has been substantially disturbed through past development of the existing student housing complexes and associated parking lots. Due to past disturbances, it is unlikely to contain intact Native American archaeological deposits. There is a low potential for construction activity related to the proposed Project to uncover previously unidentified tribal cultural resources. As such, construction activity related to the Project would **not result in significant direct impacts** to CRHR or locally registered historical resources.

Under AB 52, tribal cultural resources are defined as resources that the lead agency determines to be a tribal cultural resource with a substantial burden of evidence. SDSU representatives contacted the San Pasqual Band to schedule a meeting/consultation. As of this writing, the meeting has not yet taken place. On November 4, 2024, SDSU representatives were informed that Bernice Paipa, Cultural Resource Specialist for the Sycuan Band of the Kumeyaay Nation and a representative of the Kumeyaay Cultural Repatriation Committee (KCRC), expressed interest in the Project. On December 6, 2024, SDSU representatives and the Sycuan Band attended a pre-consultation meeting and a site walk was requested. Ms. Paipa also let SDSU representatives know that Daniel Tsosie, Tribal Historic Preservation Officer from the Campo Band of Diegueño Mission Indians, also expressed interest in the Project and may request consultation on the Project. The site visit commenced on December 10, 2024, and no additional requests were made during the site visit, aside from a follow-up consultation request. Consultation is currently ongoing.

To date, no tribal cultural resources have been identified through consultation that would be impacted by Project implementation. The discovery of tribal cultural resources poses a potential significant impact to tribal cultural resources. Therefore, mitigation is provided that would reduce any potential impacts to less than significant (see MM-CUL-3). With implementation of the recommended mitigation measure (MM-CUL-3), impacts would be reduced to below a level of significance. Impacts of the Project are considered **less than significant with mitigation** incorporated during construction.

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# 6 Mitigation Measures

The following mitigation measures (MM) would reduce the identified potentially significant impacts on archaeological and tribal cultural resources to less than significant.

MM-CUL-1 In the event that archaeological resources (sites, features, or artifacts) are exposed/uncovered during construction activities associated with the Project, CSU/SDSU, or its designee, shall immediately stop all construction work occurring within 50 feet of the find 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 shall be developed by the qualified archaeologist in consultation with CSU/San Diego State University 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 San Diego State University's approval.

MM-CUL-2 In the event that any human remains are discovered during construction activities, CSU/SDSU, or its designee, shall contact the San Diego County Medical Examiner. Upon identification of human remains, no further disturbance shall occur in the immediate area of the find until the County Medical Examiner has made the necessary findings as to origin. If the remains are determined to be of Native American origin, the Most Likely Descendant, as identified by the Native American Heritage Commission, shall be contacted by the property owner or their representative to make recommendations regarding the proper treatment and disposition of the remains. The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until the opportunity to complete consultation with the Most Likely Descendant regarding their recommendations as required by California Public Resources Code Section 5097.98 has occurred. All relevant provisions of California Public Resources Code Section 5097.98, CEQA Section 15064.5, and California Health and Safety Code Section 7050.5 shall be followed.

MM-CUL-3 Although the potential for discovery of tribal cultural resources on the Project site is considered low, in response to the requests made during AB 52 consultation meetings, the CSU/SDSU shall authorize tribal monitoring of such resources during Project construction grading activities and shall provide appropriate remuneration for such monitoring consistent with standard practices. SDSU retains the authority to select the monitor, which shall be provided by Traditionally and Culturally Affiliated (TCA) Native American Tribe. Such monitoring by a single tribal monitor shall be authorized on a daily basis during Project construction grading activities; however, in the event a monitor is not available on any given day, Project construction activities may continue uninterrupted. In the event tribal cultural resources are inadvertently encountered during Project construction activities, work in the immediate area must stop and a qualified archaeologist meeting the Secretary of the Interior's Professional Standards shall assess the discovery in consultation with the TCA Native American Tribe to evaluate the resource and develop a plan for treatment and disposition of the resource. If avoidance is not feasible, additional work such as data recovery may

be warranted. Following evaluation by a qualified archaeologist, in consultation with the consulting tribes and the CSU/SDSU, construction shall be permitted to resume.

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## 7 Level of Significance After Mitigation

Implementation of the recommended mitigation measures would ensure the proper treatment of unanticipated archaeological or tribal cultural resource finds, including human remains, and thereby mitigate any potential significant impacts caused by construction of the proposed Project to unique cultural or tribal cultural resources to **less than significant**.

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## **Appendix A**

### Confidential SCIC Records Search Results



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## **Appendix B**

### Confidential Cultural Resources Overview Map



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## **Appendix C**

### NAHC Sacred Lands File Search and Native American Outreach



# **Sacred Lands File & Native American Contacts List Request**

## **Native American Heritage Commission**

1550 Harbor Blvd, Suite 100

West Sacramento, CA 95691

916-373-3710

916-373-5471 – Fax

[nahc@nahc.ca.gov](mailto:nahc@nahc.ca.gov)

*Information Below is Required for a Sacred Lands File Search*

**Project:** San Diego State University Evolve Student Housing Project (PN # 15464.12)

**County:** San Diego County

**USGS Quadrangle Name:** 7.5-Minute Series La Mesa Quadrangle

**Township:** 16S      **Range:** 2W      **Section(s):** 15, 22

**Company/Firm/Agency:** Dudek

**Street Address:** 605 Third Street

**City:** Encinitas      **Zip:** 92024

**Phone:** 760.479.4827

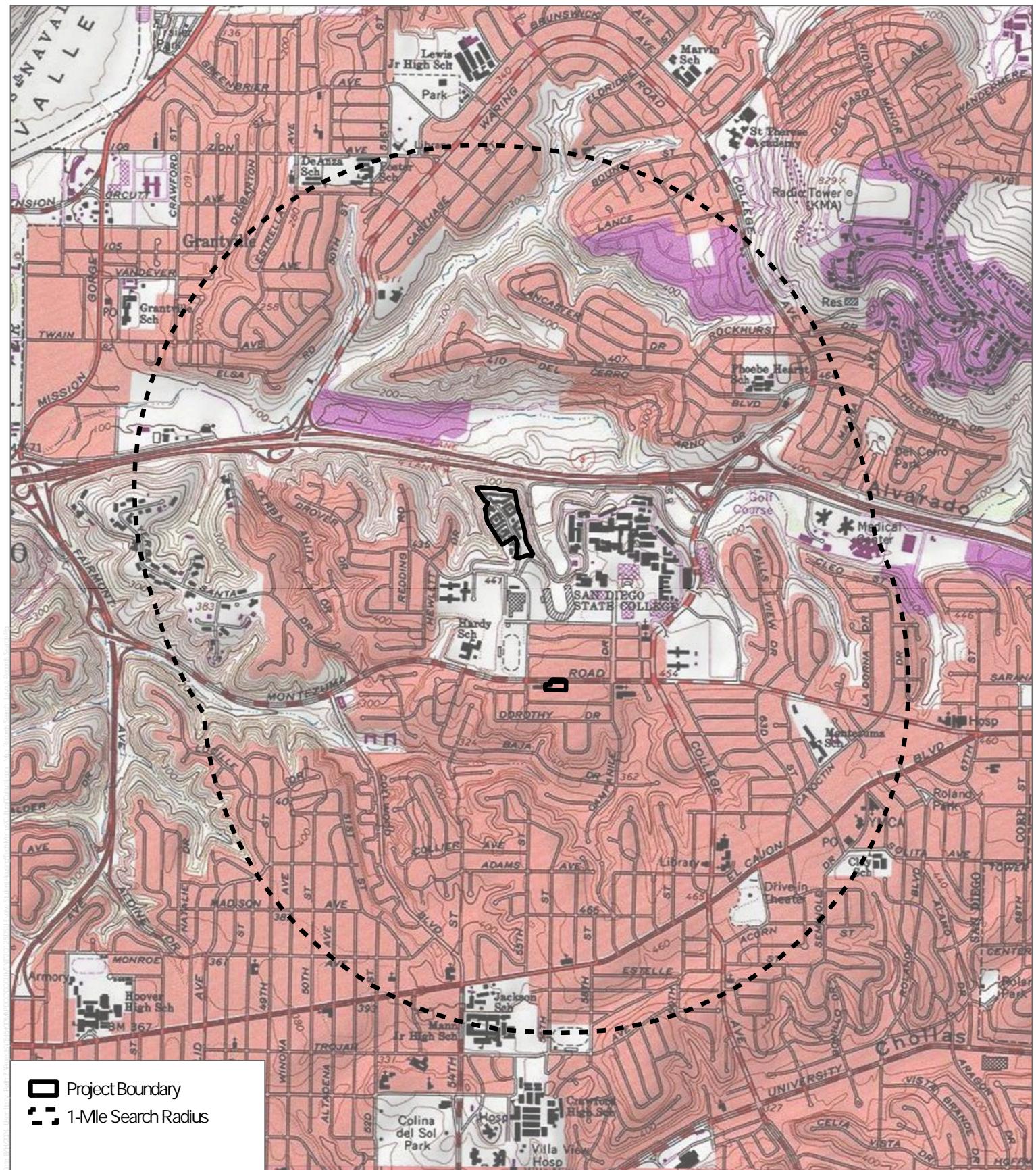
**Fax:** 760.632.0164

**Email:** mmurillo@dudek.com & mdecarlo@dudek.com

### **Project Description:**

The San Diego State University (SDSU) Evolve Student Housing Project intends to redevelop two student housing complexes at two different locations, the Peninsula component and the University Towers East component, within SDSU's Main Campus to provide a total of 3,200 new residence hallbeds for freshman and upperclassmen.





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

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Records Search  
SDSU Evolve Student Housing Project



## NATIVE AMERICAN HERITAGE COMMISSION

August 27, 2024

Makayla Murillo  
Dudek

**Via Email to:** [mmurillo@dudek.com](mailto:mmurillo@dudek.com)

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Chumash

VICE-CHAIRPERSON  
**Buffy McQuillen**  
Yokayo Pomo, Yuki,  
Nomlaki

SECRETARY  
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PARLIAMENTARIAN  
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Luiseño

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Luiseño Indians

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**Raymond C.  
Hitchcock**  
Miwok, Nisenan

**NAHC HEADQUARTERS**  
1550 Harbor Boulevard  
Suite 100  
West Sacramento,  
California 95691  
(916) 373-3710

### Re: San Diego State University Evolve Student Housing Project, San Diego County

Dear Ms. Murillo:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information you have submitted for the above referenced project. The results were negative. However, the absence of specific site information in the SLF does not indicate the absence of cultural resources in any project area. Other sources of cultural resources should also be contacted for information regarding known and recorded 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. I suggest you contact all of those indicated; if they cannot supply information, they might 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 me. 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: [Pricilla.Torres-Fuentes@nahc.ca.gov](mailto:Pricilla.Torres-Fuentes@nahc.ca.gov).

Sincerely,

*Pricilla Torres-Fuentes*

Pricilla Torres-Fuentes  
Cultural Resources Analyst

Attachment

Native American Heritage Commission  
 Native American Contact List  
 San Diego County  
 8/27/2024

County	Tribe Name	Fed (F) Non-Fed (N)	Contact Person	Contact Address	Phone #	Fax #	Email Address	Cultural Affiliation	Counties	Last Updated
San Diego	Barona Group of the Capitan Grande	F	Art Bunce, Attorney		(760) 489-0329		buncelaw@aol.com	Diegueno	Imperial, San Diego	7/25/2023
	Campo Band of Diegueno Mission Indians	F	Marcus Cuero, Chairperson	36190 Church Road, Suite 1 Campo, CA, 91906	(619) 478-9046		marcuscuero@campo-nsn.gov	Diegueno	Imperial, San Diego	5/15/2024
	Campo Band of Diegueno Mission Indians	F	Ben Dyche, Vice Chairperson	36190 Church Road, Suite 1 Campo, CA, 91906	(619) 478-9046		bdyche@campo-nsn.gov	Diegueno	Imperial, San Diego	5/24/2024
	Campo Band of Diegueno Mission Indians	F	Daniel Tsosie, THPO	36190 Church Road, Suite 1 Campo, CA, 91906	(619) 760-6480		dtsosie@campo-nsn.gov	Diegueno	Imperial, San Diego	5/24/2024
	EWiiapaayp Band of Kumeyaay Indians	F	Robert Pinto, Chairperson	4054 Willows Road Alpine, CA, 91901	(619) 368-4382	(619) 445-9126	ceo@ebki-nsn.gov	Diegueno	Imperial, San Diego	
	EWiiapaayp Band of Kumeyaay Indians	F	Michael Garcia, Vice Chairperson	4054 Willows Road Alpine, CA, 91901	(619) 933-2200	(619) 445-9126	michaelg@leaningrock.net	Diegueno	Imperial, San Diego	
	Ipay Nation of Santa Ysabel	F	Clint Linton, Director of Cultural Resources	P.O. Box 507 Santa Ysabel, CA, 92070	(760) 803-5694			Diegueno	Imperial, San Diego	11/30/2023
	Inaja-Cosmit Band of Indians	F	Rebecca Osuna, Chairperson	2005 S. Escondido Blvd. Escondido, CA, 92025	(760) 737-7628	(760) 747-8568		Diegueno	Imperial, San Diego	
	Jamul Indian Village	F	Erica Pinto, Chairperson	P.O. Box 612 Jamul, CA, 91935	(619) 669-4785	(619) 669-4817	epinto@jiv-nsn.gov	Diegueno	Imperial, San Diego	
	Jamul Indian Village	F	Lisa Cumper, Tribal Historic Preservation Officer	P.O. Box 612 Jamul, CA, 91935	(619) 669-4855		lcumper@jiv-nsn.gov	Diegueno	Imperial, San Diego	9/5/2018
	La Posta Band of Diegueno Mission Indians	F	Gwendolyn Parada, Chairperson	8 Crestwood Road Boulevard, CA, 91905	(619) 478-2113	(619) 478-2125	LP13boots@aol.com	Diegueno	Imperial, San Diego	
	Manzana Band of Kumeyaay Nation	F	Angela Elliott Santos, Chairperson	P.O. Box 1302 Boulevard, CA, 91905	(619) 766-4930	(619) 766-4957		Diegueno	Imperial, San Diego	
	Mesa Grande Band of Diegueno Mission Indians	F	Michael Linton, Chairperson	P.O. Box 270 Santa Ysabel, CA, 92070	(760) 782-3818	(760) 782-9092	mesagrandeband@msn.com	Diegueno	Imperial, San Diego	
	San Pasqual Band of Diegueno Mission Indians	F	Allen Lawson, Chairperson	P.O. Box 365 Valley Center, CA, 92082	(760) 749-3200	(760) 749-3876	allenl@sanpasqualtribe.org	Diegueno	Imperial, San Diego	
	San Pasqual Band of Diegueno Mission Indians	F	John Flores, Environmental Coordinator	P. O. Box 365 Valley Center, CA, 92082	(760) 749-3200	(760) 749-3876	johnf@sanpasqualtribe.org	Diegueno	Imperial, San Diego	8/16/2016
	Sycuan Band of the Kumeyaay Nation	F	Bernice Paipa, Cultural Resource Specialist	Sycuan Cultural Center: 910 Willow Glen Drive El Cajon, CA, 92019	(619) 445-6917		bpaipa2@sycuan-nsn.gov	Kumeyaay	Imperial, San Diego	8/7/2023
	Sycuan Band of the Kumeyaay Nation	F	Cody Martinez, Chairman	Sycuan Tribal Office: 1 Kwaayaaay Court El Cajon, CA, 92019	(619) 445-2613		cmartinez@sycuan-nsn.gov	Kumeyaay	Imperial, San Diego	8/7/2023
	Viejas Band of Kumeyaay Indians	F	Ray Teran, Resource Management Director	1 Viejas Grade Road Alpine, CA, 91901	(619) 659-2312		rteran@viejas-nsn.gov	Kumeyaay	Imperial, San Diego	6/29/2023
	Viejas Band of Kumeyaay Indians	F	Ernest Pingleton, THPO	1 Viejas Grade Road Alpine, CA, 91901	(619) 445-3810		epingleton@viejas-nsn.gov	Kumeyaay	Imperial, San Diego	6/29/2023

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

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

Record: PRO-2024-004431  
 Report Type: List of Tribes  
 Counties: San Diego  
 NAHC Group: All

# DUDEK

MAIN OFFICE  
605 THIRD STREET  
ENCINITAS, CALIFORNIA 92024  
T 800.450.1818 F 760.632.0164

August 28, 2024

PN 15464.12

Mr. Art Bunce, Attorney  
Barona Group of the Capitan Grande  
1095 Barona Road  
Lakeside, CA 92040

**Subject:** Information Request for the Evolve Student Housing Project, San Diego State University, City of San Diego, California

Dear Mr. Bunce,

The Evolve Student Housing Project (Project) is located at San Diego State University (SDSU) Main Campus, City of San Diego, California (Figure 1). The Project consists of two student housing complexes at two different locations within SDSU's Main Campus to provide a total of 3,200 new residence hall beds. The Project APE falls on Section 15 and 22, Township 16 South, Range 2 West in the La Mesa U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

As part of the cultural resources study prepared for the proposed Project, Dudek contacted the Native American Heritage Commission (NAHC) conducted a Sacred Lands file (SLF) search and a list of Native American individuals and/or tribal organizations who may have knowledge of cultural resources in or near the Project APE. The NAHC emailed a response on August 27, 2024, which stated that the SLF search did not identify the presence of Native American cultural resources in the immediate Project APE

Please note that this letter does not constitute Assembly Bill (AB) 52 notification or initiation of consultation. Tribes that wish to be notified of projects for the purposes of consultation must contact the lead agency, The Board of Trustees of California State University (CSU Trustees), in writing (pursuant to Public Resources Code Section 21080.3.1 (b)).

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

Respectfully,



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Makayla Murillo, B.A.

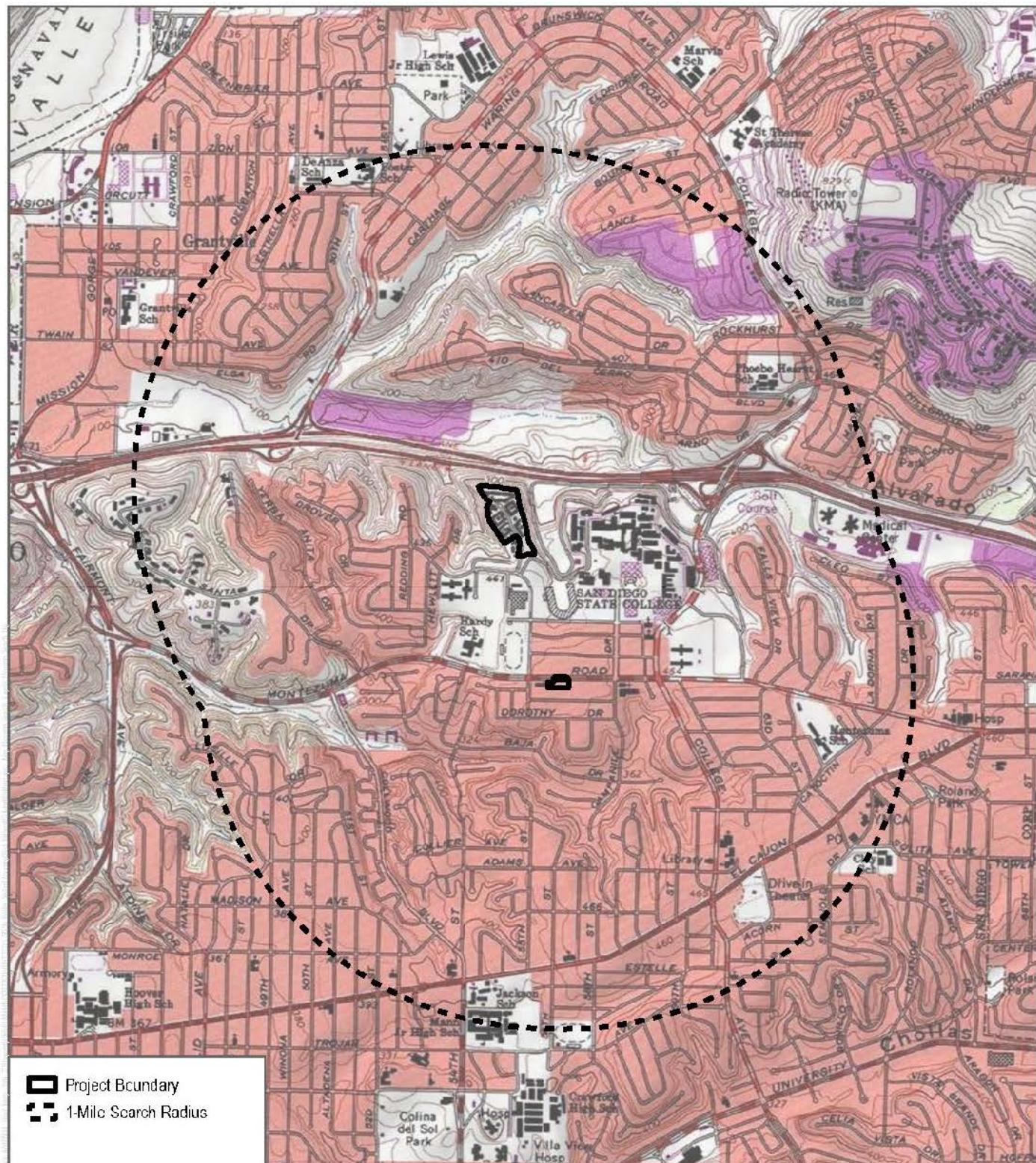
Archaeologist

DUDEK

Phone: (760) 846-5874

Email: mmurillo@dudek.com

**Attachments:** Figure 1. Regional project map.



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

**DUDEK** 1.24,000 0 250 500 Meters

Records Search

SDSU Evolve Student Housing Project

# DUDEK

MAIN OFFICE  
605 THIRD STREET  
ENCINITAS, CALIFORNIA 92024  
T 800.450.1818 F 760.632.0164

August 28, 2024

PN 15464.12

Mr. Ben Dyche, Vice Chairperson  
Campo Band of Diegueno Mission Indians  
36190 Church Road, Suite 1  
Campo, CA 91906

**Subject:** Information Request for the Evolve Student Housing Project, San Diego State University, City of San Diego, California

Dear Mr. Dyche,

The Evolve Student Housing Project (Project) is located at San Diego State University (SDSU) Main Campus, City of San Diego, California (Figure 1). The Project consists of two student housing complexes at two different locations within SDSU's Main Campus to provide a total of 3,200 new residence hall beds. The Project APE falls on Section 15 and 22, Township 16 South, Range 2 West in the La Mesa U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

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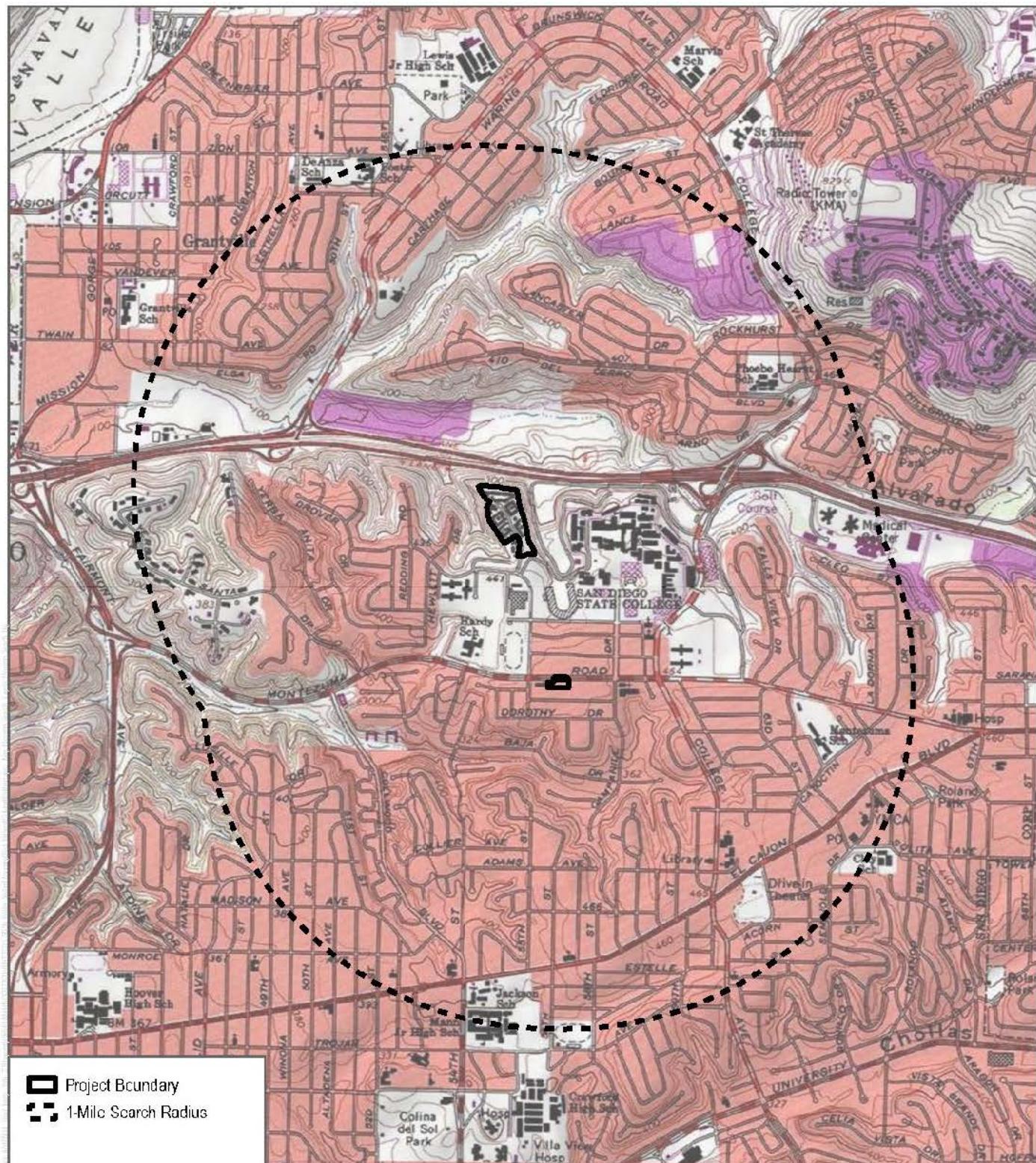
Archaeologist

DUDEK

Phone: (760) 846-5874

Email: mmurillo@dudek.com

**Attachments:** Figure 1. Regional project map.



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 Township 16S; Range 2W; Sections 15, 22

**DUDEK** 1.24,000 0 250 500 Meters

Records Search

SDSU Evolve Student Housing Project

# DUDEK

MAIN OFFICE  
605 THIRD STREET  
ENCINITAS, CALIFORNIA 92024  
T 800.450.1818 F 760.632.0164

August 28, 2024

PN 15464.12

Mr. Marcus Cuero, Chairperson  
Campo Band of Mission Indians  
36190 Church Road, Suite 1  
Campo, CA 91906

**Subject:** Information Request for the Evolve Student Housing Project, San Diego State University, City of San Diego, California

Dear Mr. Cuero,

The Evolve Student Housing Project (Project) is located at San Diego State University (SDSU) Main Campus, City of San Diego, California (Figure 1). The Project consists of two student housing complexes at two different locations within SDSU's Main Campus to provide a total of 3,200 new residence hall beds. The Project APE falls on Section 15 and 22, Township 16 South, Range 2 West in the La Mesa U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

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Respectfully,



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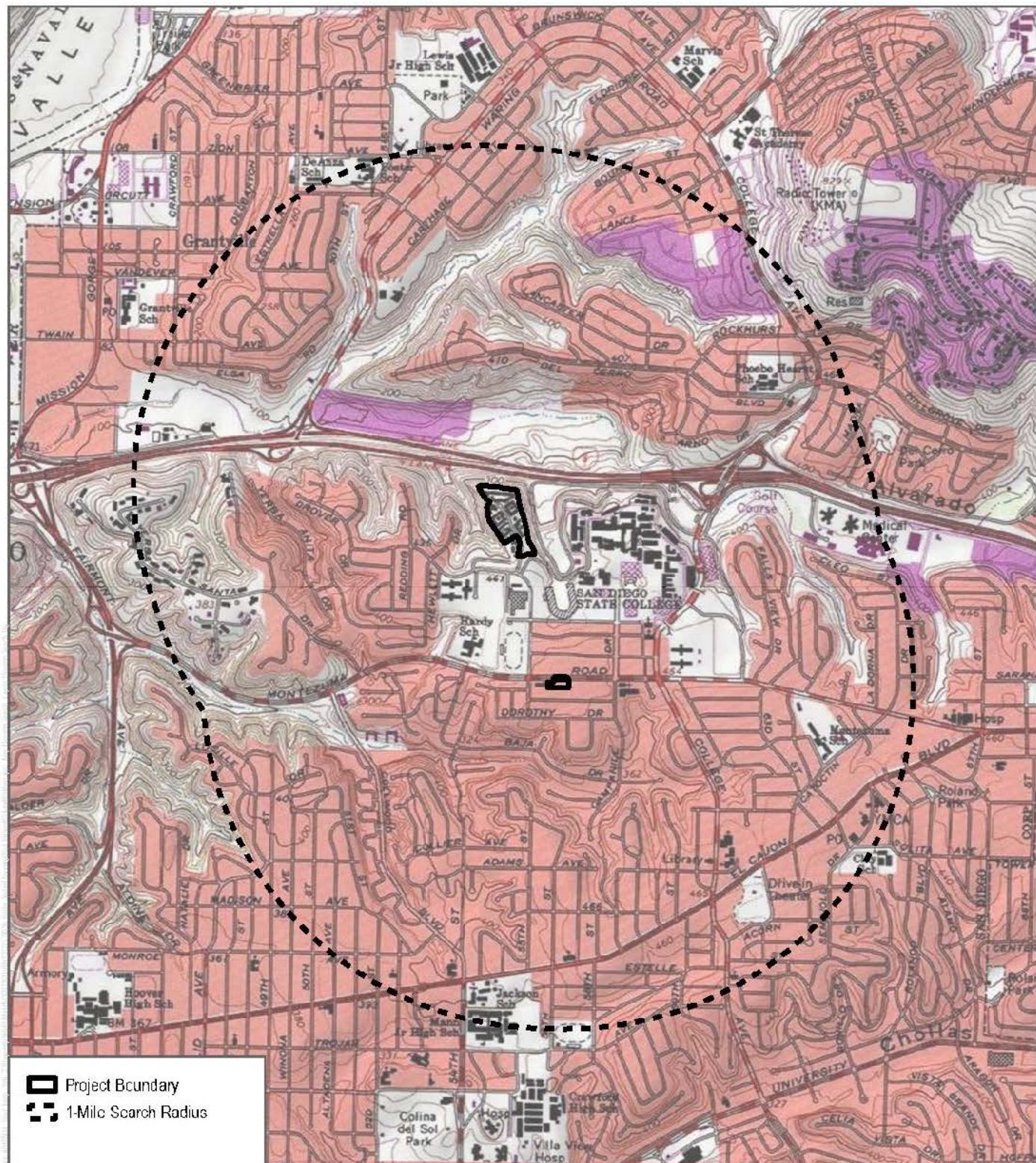
Archaeologist

DUDEK

Phone: (760) 846-5874

Email: mmurillo@dudek.com

**Attachments:** Figure 1. Regional project map.



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 Township 16S; Range 2W; Sections 15, 22

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Records Search

SDSU Evolve Student Housing Project

# DUDEK

MAIN OFFICE  
605 THIRD STREET  
ENCINITAS, CALIFORNIA 92024  
T 800.450.1818 F 760.632.0164

August 28, 2024

PN 15464.12

Mr. Daniel Tsosie, THPO  
Campo Kumeyaay Nation  
36190 Church Road, Suite 1  
Campo, CA 91906

**Subject:** Information Request for the Evolve Student Housing Project, San Diego State University, City of San Diego, California

Dear Mr. Tsosie,

The Evolve Student Housing Project (Project) is located at San Diego State University (SDSU) Main Campus, City of San Diego, California (Figure 1). The Project consists of two student housing complexes at two different locations within SDSU's Main Campus to provide a total of 3,200 new residence hall beds. The Project APE falls on Section 15 and 22, Township 16 South, Range 2 West in the La Mesa U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

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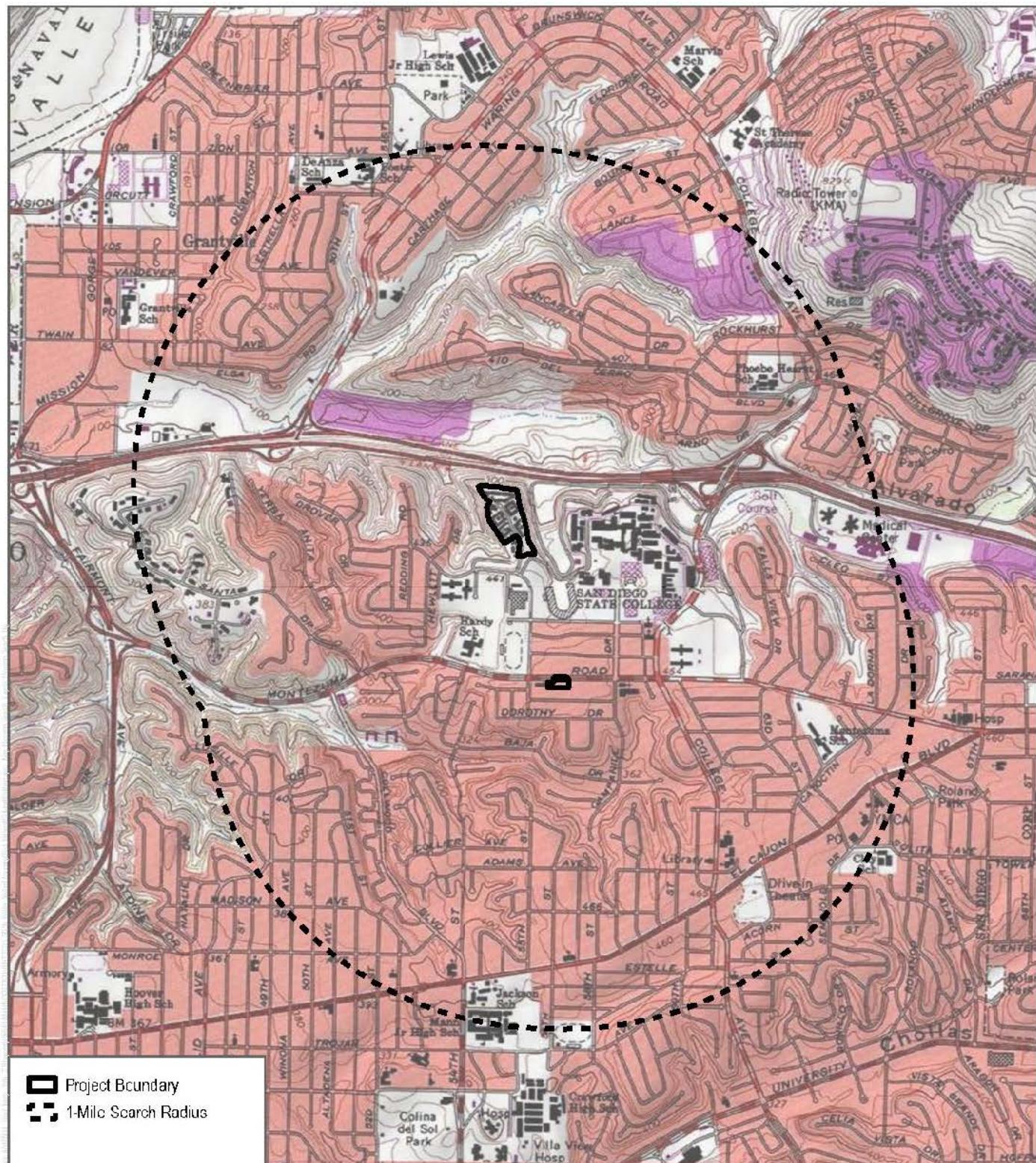
Archaeologist

DUDEK

Phone: (760) 846-5874

Email: mmurillo@dudek.com

**Attachments:** *Figure 1. Regional project map.*



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

**DUDEK** 1.24,000 0 250 500 Meters

Records Search

SDSU Evolve Student Housing Project

# DUDEK

MAIN OFFICE  
605 THIRD STREET  
ENCINITAS, CALIFORNIA 92024  
T 800.450.1818 F 760.632.0164

August 28, 2024

PN 15464.12

Mr. Robert Pinto, Chairperson  
Ewiaapaayp Band of Kumeyaay Indians  
4054 Willow Rd.  
Alpine, CA 91901

**Subject: Information Request for the Evolve Student Housing Project, San Diego State University, City of San Diego, California**

Dear Mr. Pinto,

The Evolve Student Housing Project (Project) is located at San Diego State University (SDSU) Main Campus, City of San Diego, California (Figure 1). The Project consists of two student housing complexes at two different locations within SDSU's Main Campus to provide a total of 3,200 new residence hall beds. The Project APE falls on Section 15 and 22, Township 16 South, Range 2 West in the La Mesa U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

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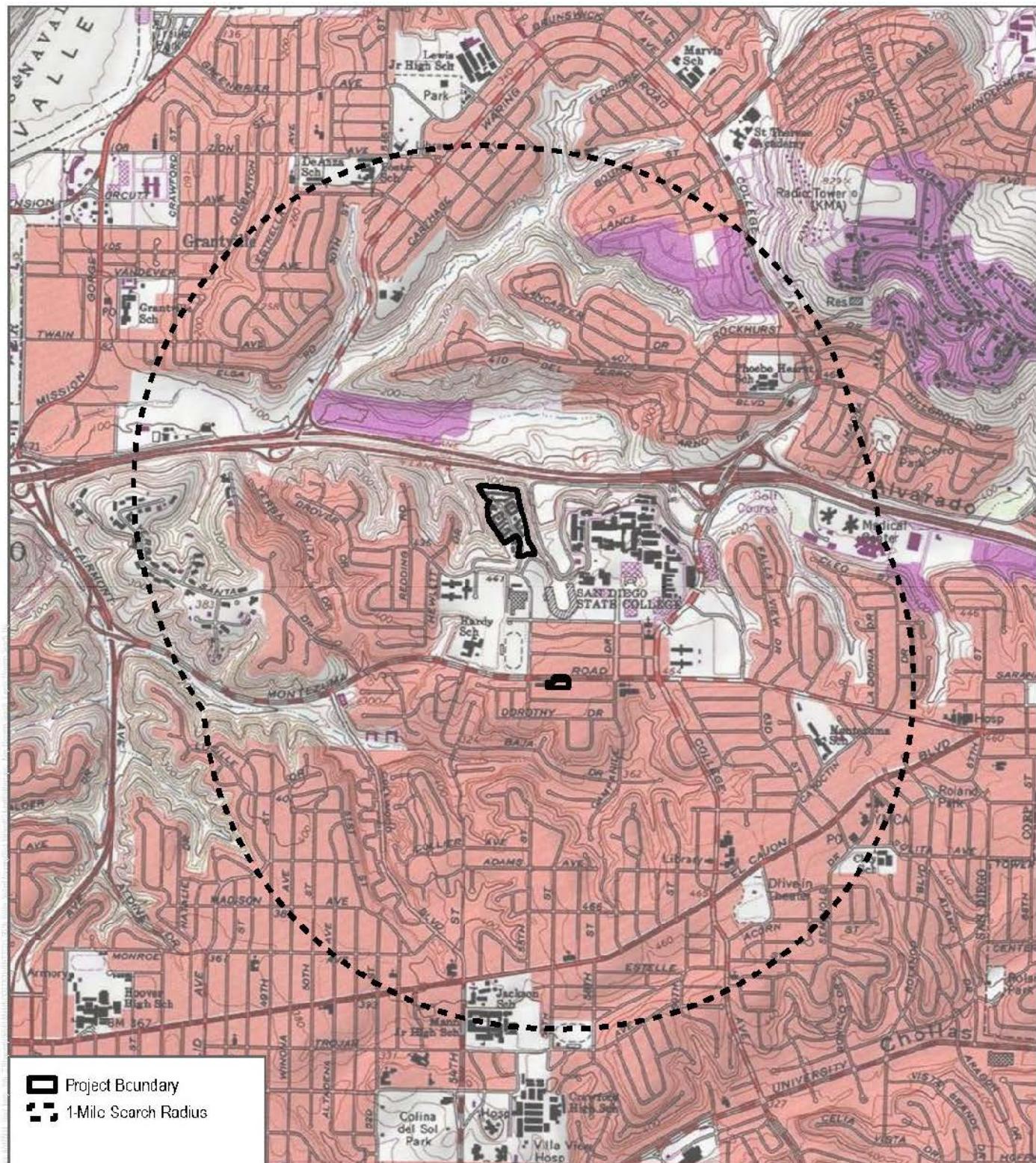
Archaeologist

DUDEK

Phone: (760) 846-5874

Email: mmurillo@dudek.com

**Attachments:** *Figure 1. Regional project map.*



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

**DUDEK** 1.24,000 0 250 500 Meters

Records Search

SDSU Evolve Student Housing Project

# DUDEK

MAIN OFFICE  
605 THIRD STREET  
ENCINITAS, CALIFORNIA 92024  
T 800.450.1818 F 760.632.0164

August 28, 2024

PN 15464.12

Mr. Michael Garcia, Vice Chairperson  
Ewiaapaayp Band of Kumeyaay Indians  
4054 Willows Road  
Alpine, CA 91901

**Subject: Information Request for the Evolve Student Housing Project, San Diego State University, City of San Diego, California**

Dear Mr. Garcia,

The Evolve Student Housing Project (Project) is located at San Diego State University (SDSU) Main Campus, City of San Diego, California (Figure 1). The Project consists of two student housing complexes at two different locations within SDSU's Main Campus to provide a total of 3,200 new residence hall beds. The Project APE falls on Section 15 and 22, Township 16 South, Range 2 West in the La Mesa U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

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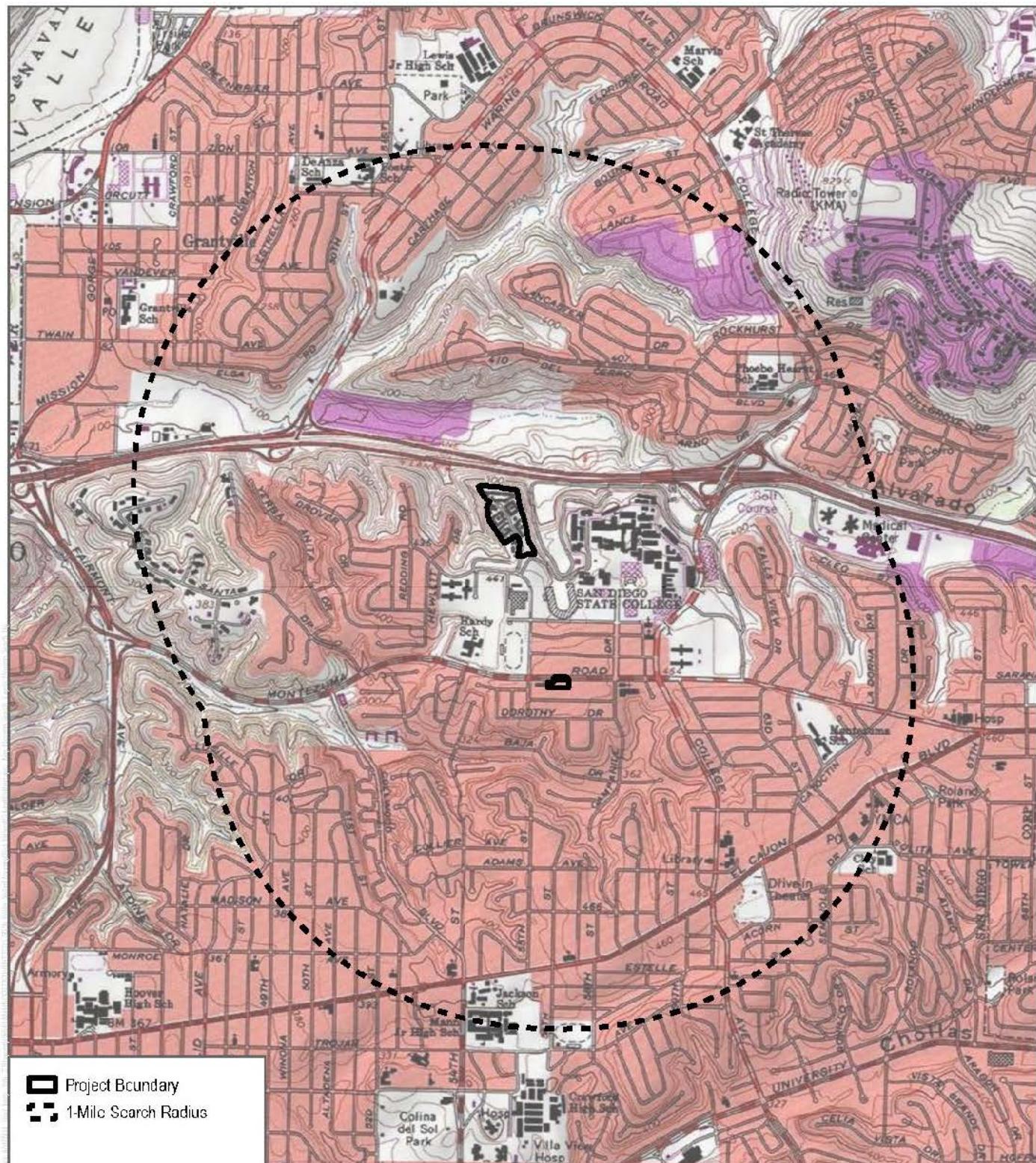
Archaeologist

DUDEK

Phone: (760) 846-5874

Email: mmurillo@dudek.com

**Attachments:** *Figure 1. Regional project map.*



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

**DUDEK** 1.24,000 0 250 500 Meters

Records Search

SDSU Evolve Student Housing Project

# DUDEK

MAIN OFFICE  
605 THIRD STREET  
ENCINITAS, CALIFORNIA 92024  
T 800.450.1818 F 760.632.0164

August 28, 2024

PN 15464.12

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

**Subject: Information Request for the Evolve Student Housing Project, San Diego State University, City of San Diego, California**

Dear Ms. Osuna,

The Evolve Student Housing Project (Project) is located at San Diego State University (SDSU) Main Campus, City of San Diego, California (Figure 1). The Project consists of two student housing complexes at two different locations within SDSU's Main Campus to provide a total of 3,200 new residence hall beds. The Project APE falls on Section 15 and 22, Township 16 South, Range 2 West in the La Mesa U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

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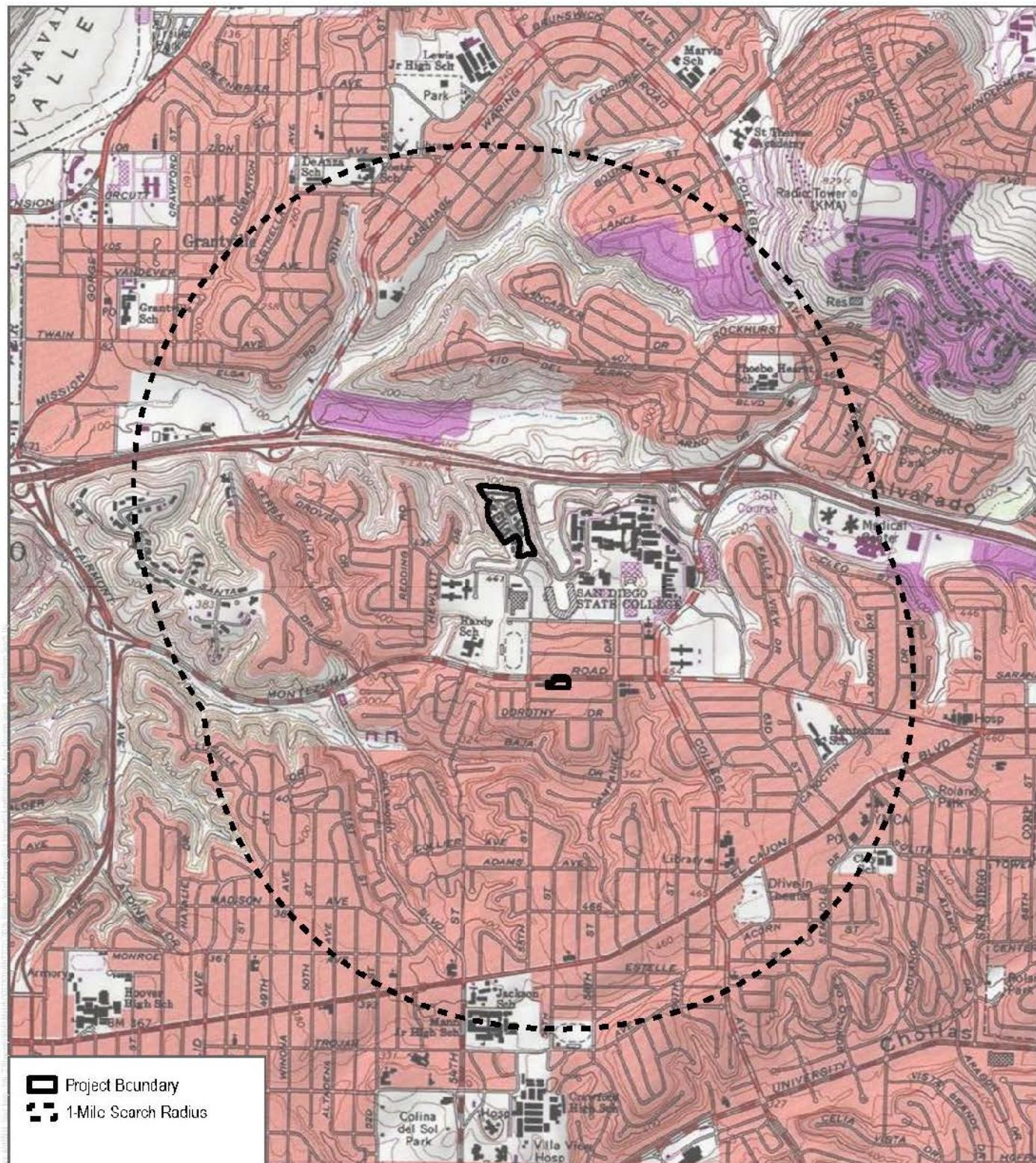
Archaeologist

DUDEK

Phone: (760) 846-5874

Email: mmurillo@dudek.com

**Attachments:** *Figure 1. Regional project map.*



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

**DUDEK** 1.24,000 0 250 500 Meters

Records Search

SDSU Evolve Student Housing Project

# DUDEK

MAIN OFFICE  
605 THIRD STREET  
ENCINITAS, CALIFORNIA 92024  
T 800.450.1818 F 760.632.0164

August 28, 2024

PN 15464.12

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

**Subject: Information Request for the Evolve Student Housing Project, San Diego State University, City of San Diego, California**

Dear Mr. Linton,

The Evolve Student Housing Project (Project) is located at San Diego State University (SDSU) Main Campus, City of San Diego, California (Figure 1). The Project consists of two student housing complexes at two different locations within SDSU's Main Campus to provide a total of 3,200 new residence hall beds. The Project APE falls on Section 15 and 22, Township 16 South, Range 2 West in the La Mesa U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

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Makayla Murillo, B.A.

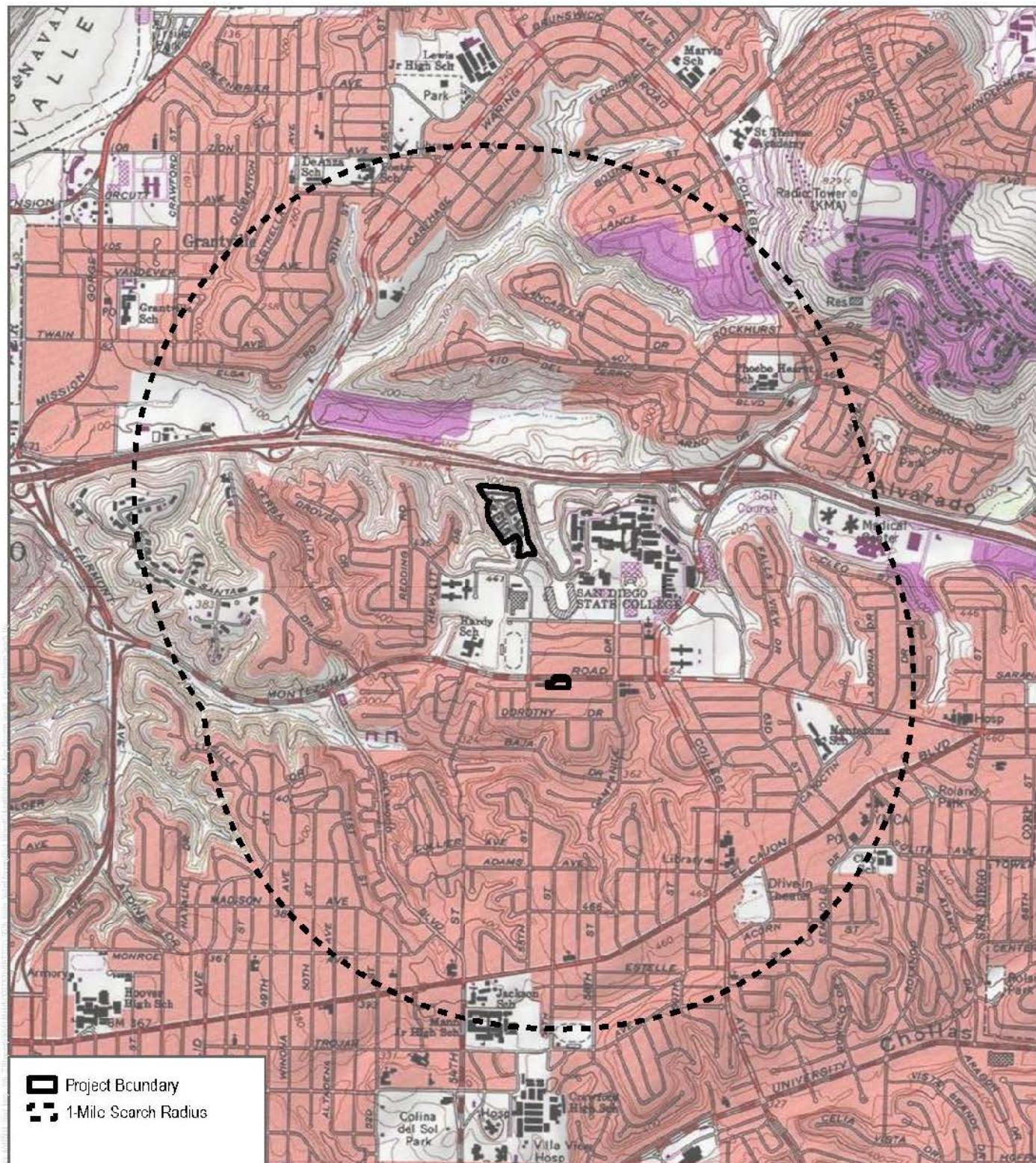
Archaeologist

DUDEK

Phone: (760) 846-5874

Email: mmurillo@dudek.com

**Attachments:** *Figure 1. Regional project map.*



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

**DUDEK** 1.24,000 0 250 500 Meters

Records Search

SDSU Evolve Student Housing Project

# DUDEK

MAIN OFFICE  
605 THIRD STREET  
ENCINITAS, CALIFORNIA 92024  
T 800.450.1818 F 760.632.0164

August 28, 2024

PN 15464.12

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

**Subject: Information Request for the Evolve Student Housing Project, San Diego State University, City of San Diego, California**

Dear Ms. Cumper,

The Evolve Student Housing Project (Project) is located at San Diego State University (SDSU) Main Campus, City of San Diego, California (Figure 1). The Project consists of two student housing complexes at two different locations within SDSU's Main Campus to provide a total of 3,200 new residence hall beds. The Project APE falls on Section 15 and 22, Township 16 South, Range 2 West in the La Mesa U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

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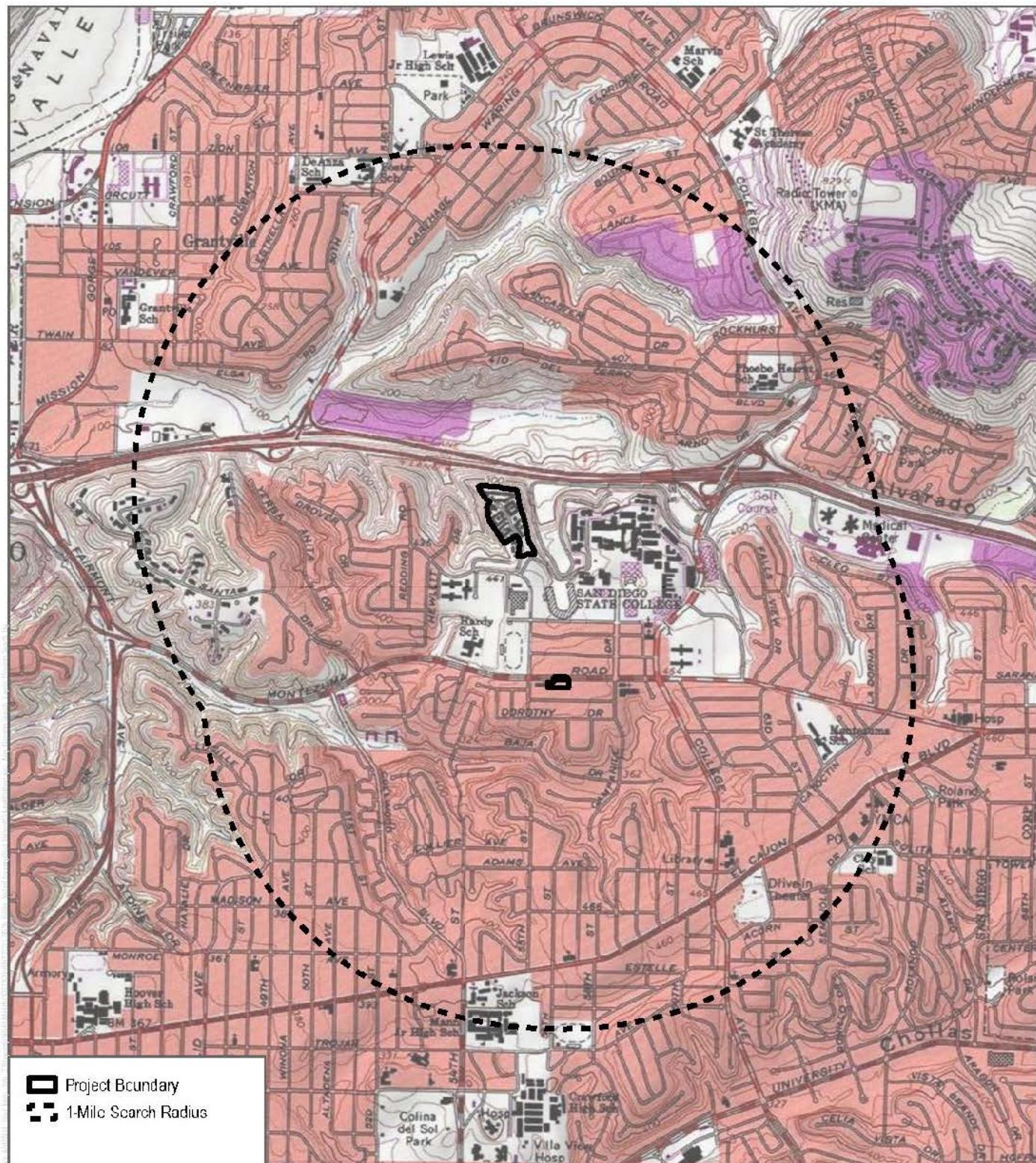
Archaeologist

DUDEK

Phone: (760) 846-5874

Email: mmurillo@dudek.com

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 Township 16S; Range 2W; Sections 15, 22

**DUDEK** 1.24,000 0 250 500 Meters

Records Search

SDSU Evolve Student Housing Project

# DUDEK

MAIN OFFICE  
605 THIRD STREET  
ENCINITAS, CALIFORNIA 92024  
T 800.450.1818 F 760.632.0164

August 28, 2024

PN 15464.12

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

**Subject: Information Request for the Evolve Student Housing Project, San Diego State University, City of San Diego, California**

Dear Ms. Pinto,

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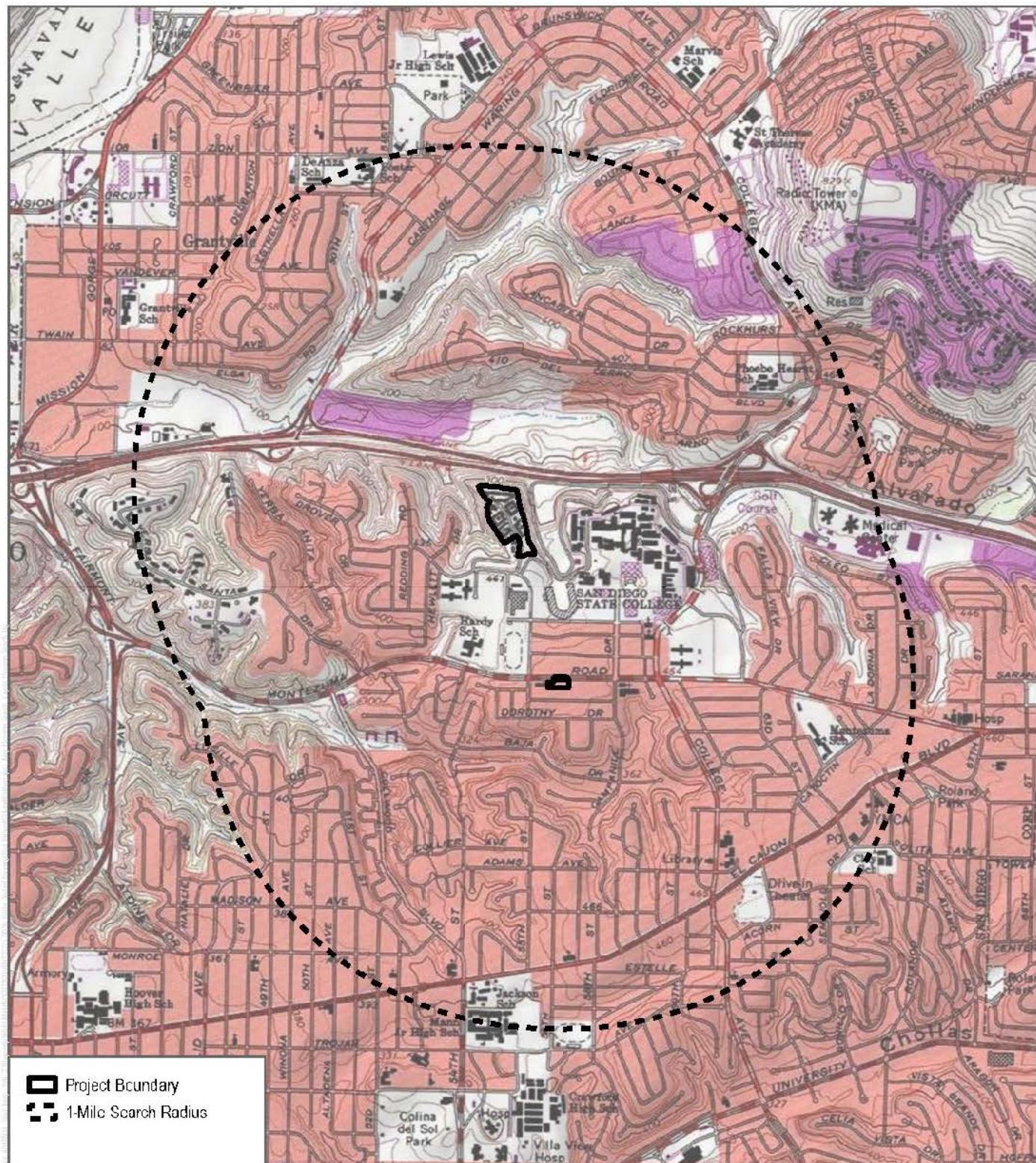
Archaeologist

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Email: mmurillo@dudek.com

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 Township 16S; Range 2W; Sections 15, 22

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Records Search

SDSU Evolve Student Housing Project

# DUDEK

MAIN OFFICE  
605 THIRD STREET  
ENCINITAS, CALIFORNIA 92024  
T 800.450.1818 F 760.632.0164

August 28, 2024

PN 15464.12

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

**Subject: Information Request for the Evolve Student Housing Project, San Diego State University, City of San Diego, California**

Dear Ms. Parada,

The Evolve Student Housing Project (Project) is located at San Diego State University (SDSU) Main Campus, City of San Diego, California (Figure 1). The Project consists of two student housing complexes at two different locations within SDSU's Main Campus to provide a total of 3,200 new residence hall beds. The Project APE falls on Section 15 and 22, Township 16 South, Range 2 West in the La Mesa U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

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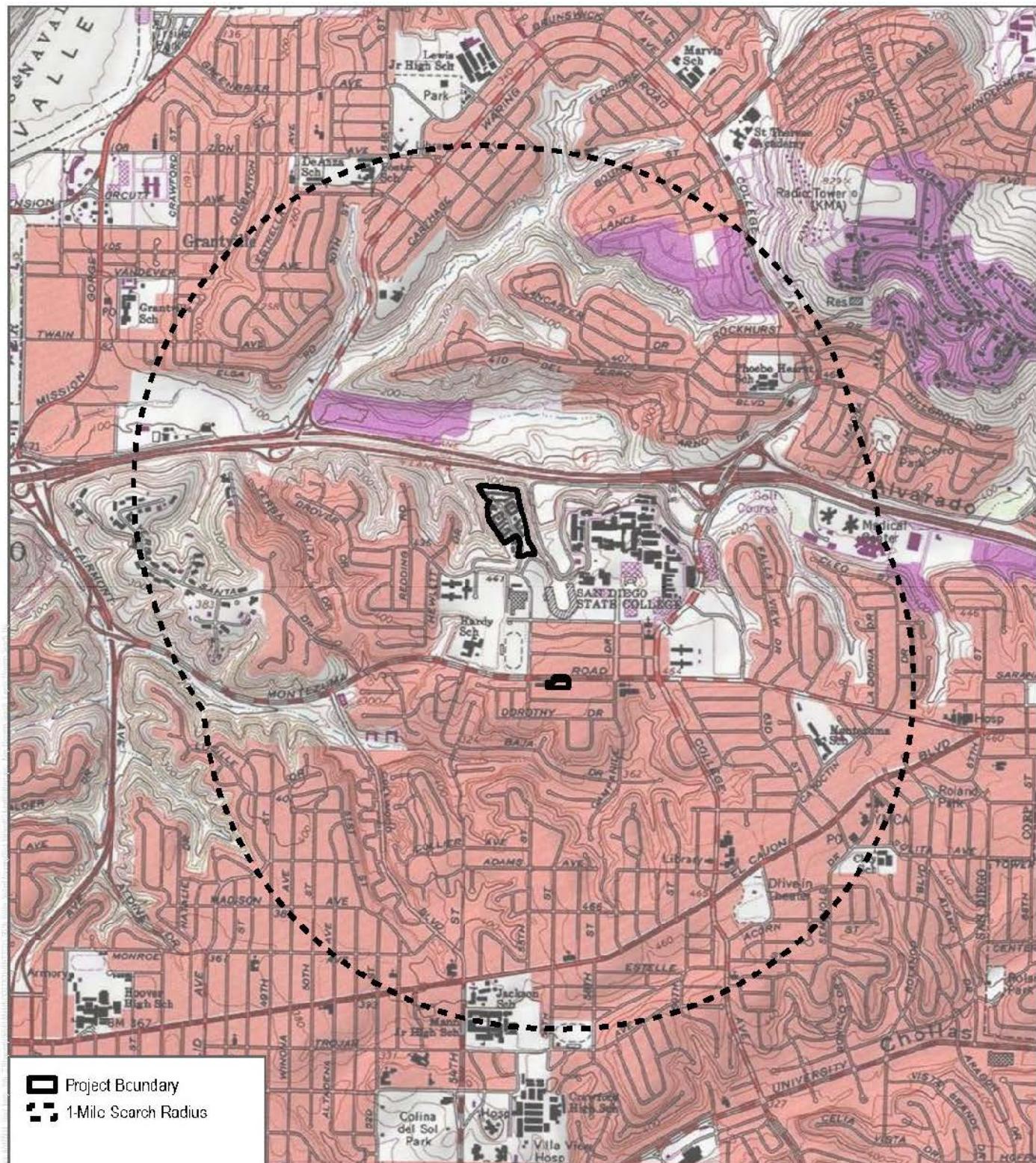
Archaeologist

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Phone: (760) 846-5874

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 Township 16S; Range 2W; Sections 15, 22

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Records Search  
 SDSU Evolve Student Housing Project

# DUDEK

MAIN OFFICE  
605 THIRD STREET  
ENCINITAS, CALIFORNIA 92024  
T 800.450.1818 F 760.632.0164

August 28, 2024

PN 15464.12

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

**Subject: Information Request for the Evolve Student Housing Project, San Diego State University, City of San Diego, California**

Dear Ms. Santos,

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

Respectfully,



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Makayla Murillo, B.A.

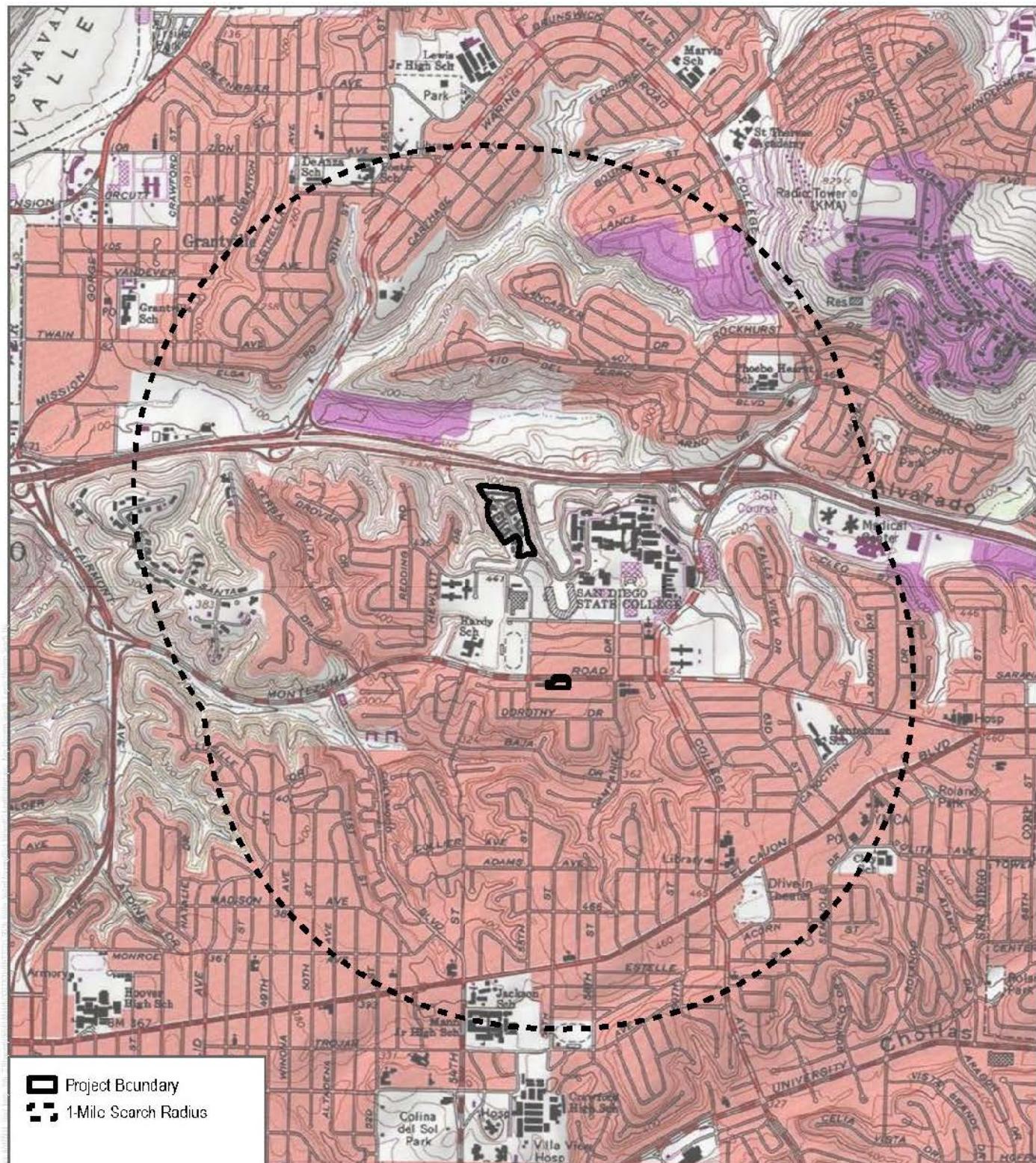
Archaeologist

DUDEK

Phone: (760) 846-5874

Email: mmurillo@dudek.com

**Attachments:** *Figure 1. Regional project map.*



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

**DUDEK** 1.24,000 0 250 500 Meters

Records Search

SDSU Evolve Student Housing Project

# DUDEK

MAIN OFFICE  
605 THIRD STREET  
ENCINITAS, CALIFORNIA 92024  
T 800.450.1818 F 760.632.0164

August 28, 2024

PN 15464.12

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

**Subject: Information Request for the Evolve Student Housing Project, San Diego State University, City of San Diego, California**

Dear Mr. Linton,

The Evolve Student Housing Project (Project) is located at San Diego State University (SDSU) Main Campus, City of San Diego, California (Figure 1). The Project consists of two student housing complexes at two different locations within SDSU's Main Campus to provide a total of 3,200 new residence hall beds. The Project APE falls on Section 15 and 22, Township 16 South, Range 2 West in the La Mesa U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

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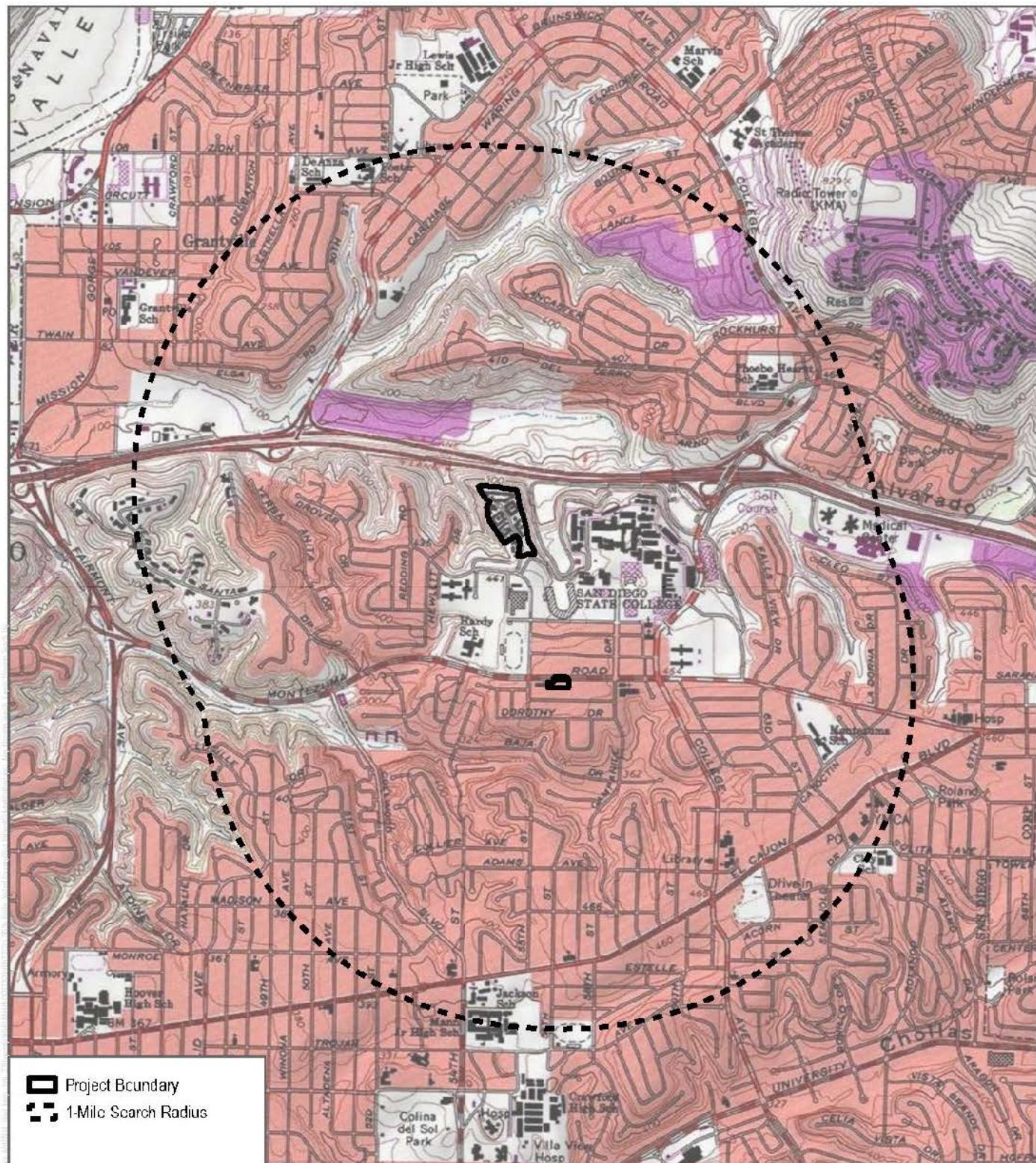
Archaeologist

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 Township 16S; Range 2W; Sections 15, 22

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## Records Search

SDSU Evolve Student Housing Project

# DUDEK

MAIN OFFICE  
605 THIRD STREET  
ENCINITAS, CALIFORNIA 92024  
T 800.450.1818 F 760.632.0164

August 28, 2024

PN 15464.12

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 Evolve Student Housing Project, San Diego State University, City of San Diego, California**

Dear Mr. Flores,

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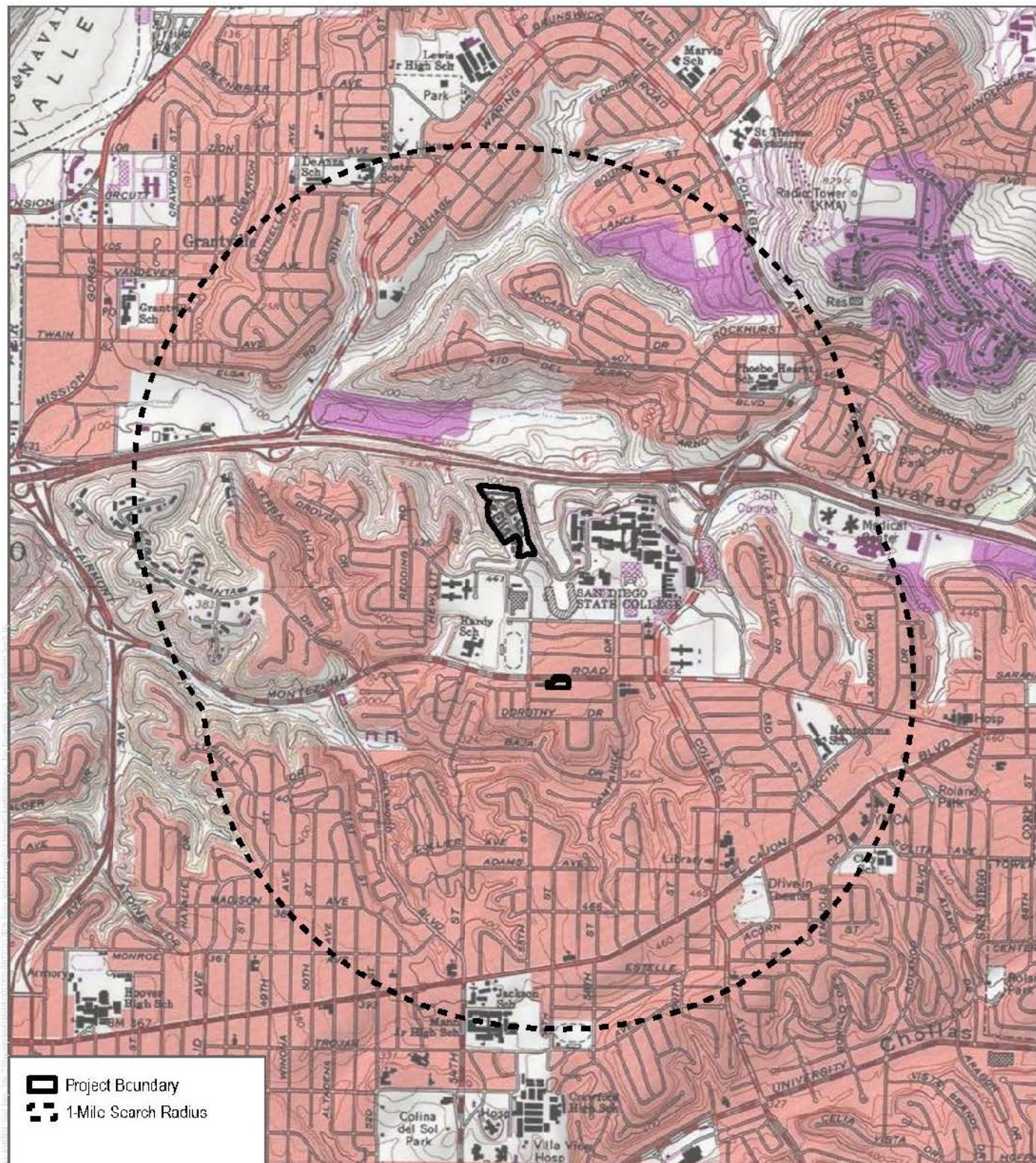
Archaeologist

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 Township 16S; Range 2W; Sections 15, 22

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Records Search

SDSU Evolve Student Housing Project

# DUDEK

MAIN OFFICE  
605 THIRD STREET  
ENCINITAS, CALIFORNIA 92024  
T 800.450.1818 F 760.632.0164

August 28, 2024

PN 15464.12

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 Evolve Student Housing Project, San Diego State University, City of San Diego, California**

Dear Mr. Lawson,

The Evolve Student Housing Project (Project) is located at San Diego State University (SDSU) Main Campus, City of San Diego, California (Figure 1). The Project consists of two student housing complexes at two different locations within SDSU's Main Campus to provide a total of 3,200 new residence hall beds. The Project APE falls on Section 15 and 22, Township 16 South, Range 2 West in the La Mesa U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

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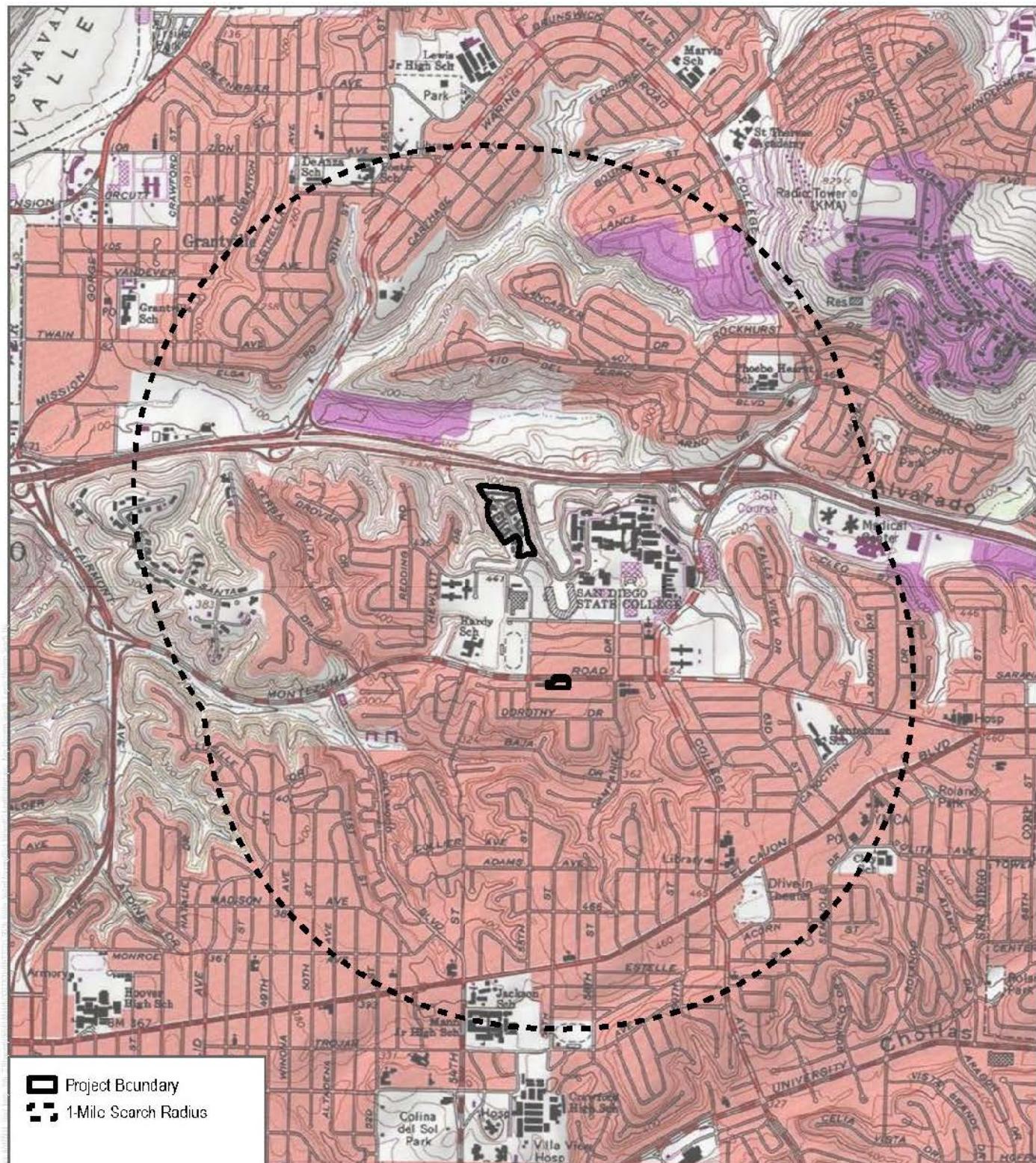
Archaeologist

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Email: mmurillo@dudek.com

**Attachments:** *Figure 1. Regional project map.*



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

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Records Search

SDSU Evolve Student Housing Project

# DUDEK

MAIN OFFICE  
605 THIRD STREET  
ENCINITAS, CALIFORNIA 92024  
T 800.450.1818 F 760.632.0164

August 28, 2024

PN 15464.12

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

**Subject: Information Request for the Evolve Student Housing Project, San Diego State University, City of San Diego, California**

Dear Mr. Martinez,

The Evolve Student Housing Project (Project) is located at San Diego State University (SDSU) Main Campus, City of San Diego, California (Figure 1). The Project consists of two student housing complexes at two different locations within SDSU's Main Campus to provide a total of 3,200 new residence hall beds. The Project APE falls on Section 15 and 22, Township 16 South, Range 2 West in the La Mesa U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

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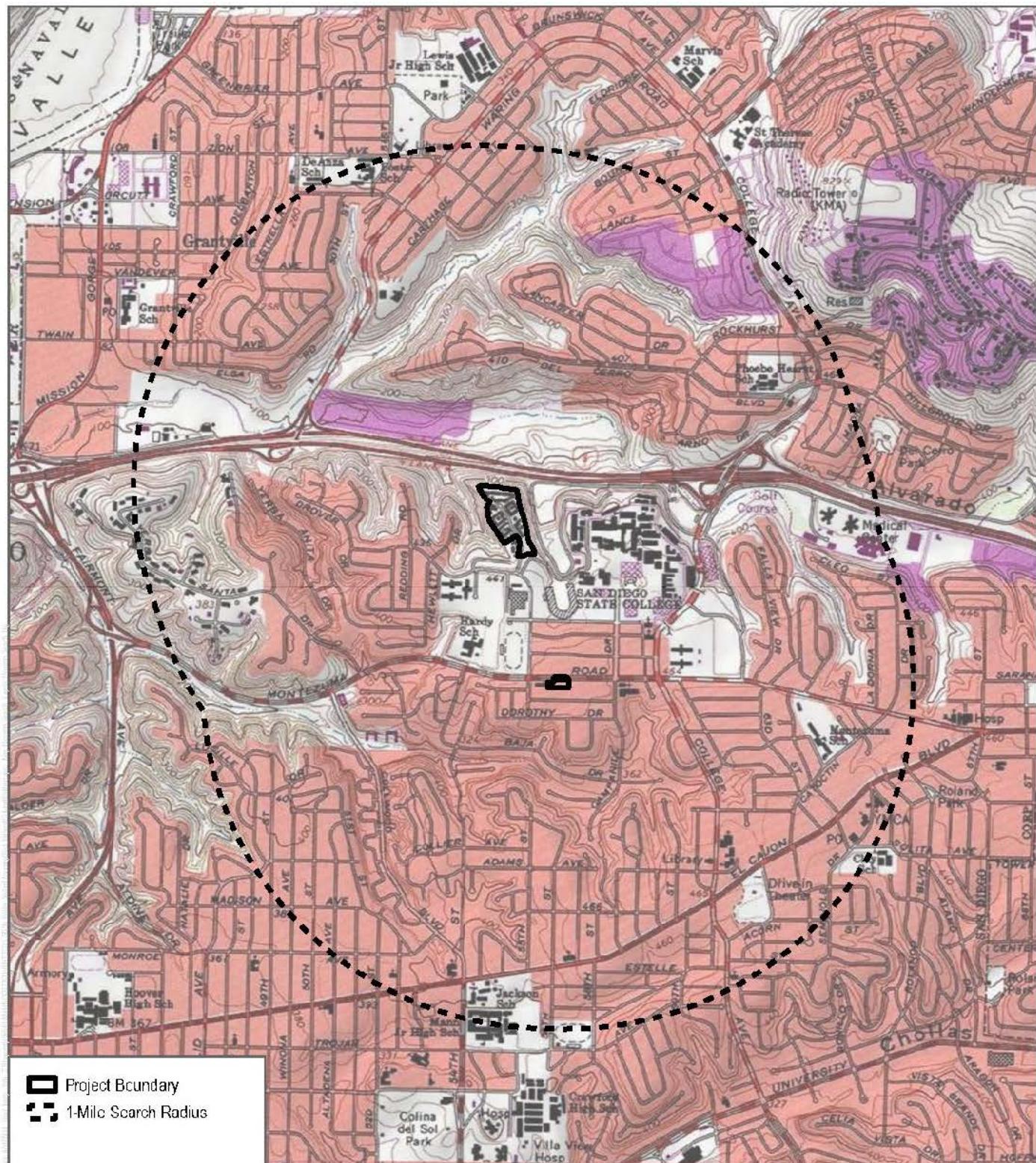
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Records Search

SDSU Evolve Student Housing Project

# DUDEK

MAIN OFFICE  
605 THIRD STREET  
ENCINITAS, CALIFORNIA 92024  
T 800.450.1818 F 760.632.0164

August 28, 2024

PN 15464.12

Ms. Bernice Paipa, Cultural Resource Specialist  
Sycuan Band of the Kumeyaay Nation  
Sycuan Cultural Center: 910 Willow Glen Drive  
El Cajon, CA, 92019

El Cajon, CA 92019

**Subject:** Information Request for the Evolve Student Housing Project, San Diego State University, City of San Diego, California

Dear Ms. Paipa,

The Evolve Student Housing Project (Project) is located at San Diego State University (SDSU) Main Campus, City of San Diego, California (Figure 1). The Project consists of two student housing complexes at two different locations within SDSU's Main Campus to provide a total of 3,200 new residence hall beds. The Project APE falls on Section 15 and 22, Township 16 South, Range 2 West in the La Mesa U.S. Geological Survey (USGS) 7.5-minute Quadrangle.

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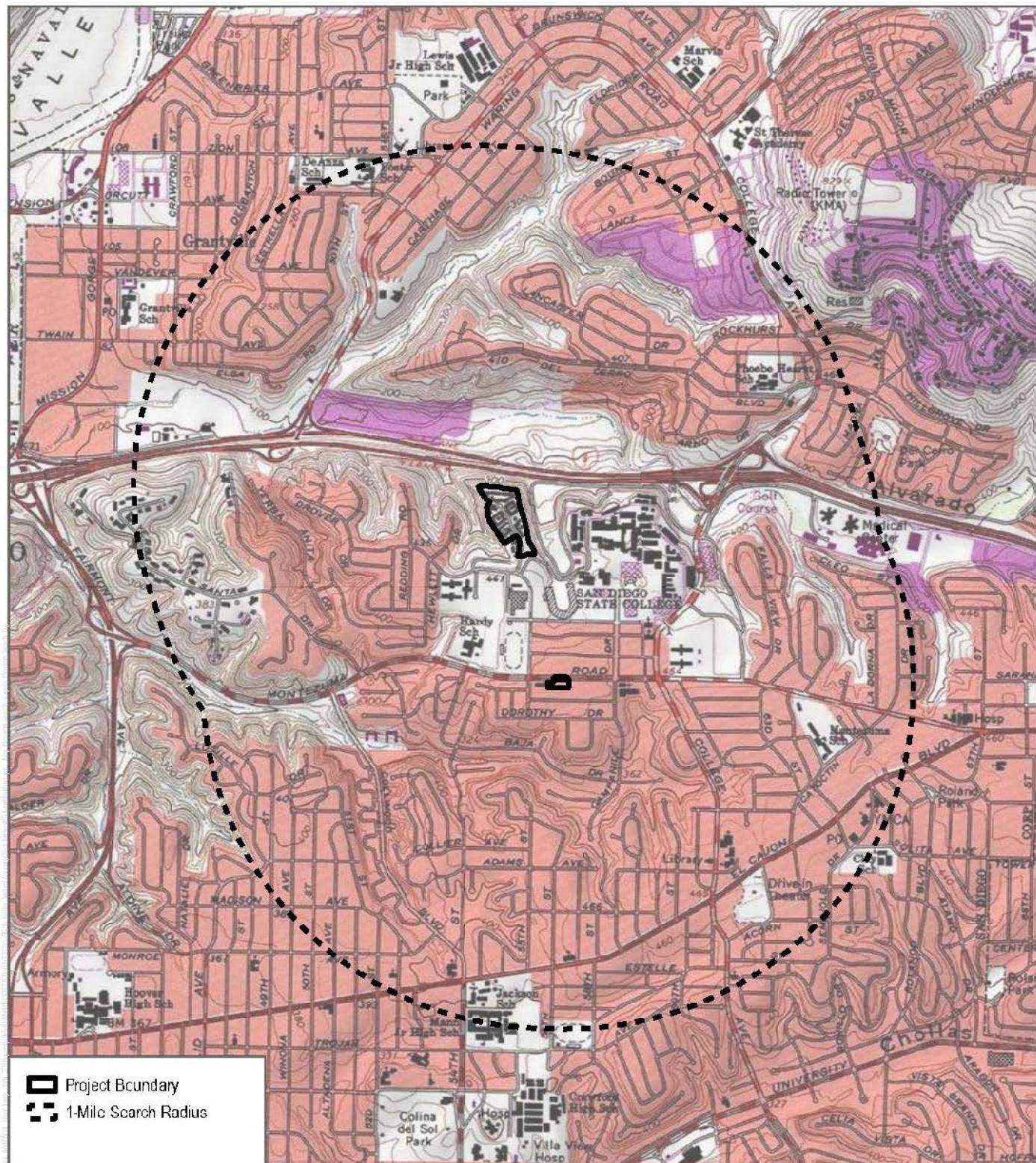
Archaeologist

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 Township 16S; Range 2W; Sections 15, 22

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SDSU Evolve Student Housing Project

# DUDEK

MAIN OFFICE  
605 THIRD STREET  
ENCINITAS, CALIFORNIA 92024  
T 800.450.1818 F 760.632.0164

August 28, 2024

PN 15464.12

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

**Subject: Information Request for the Evolve Student Housing Project, San Diego State University, City of San Diego, California**

Dear Mr. Pingleton,

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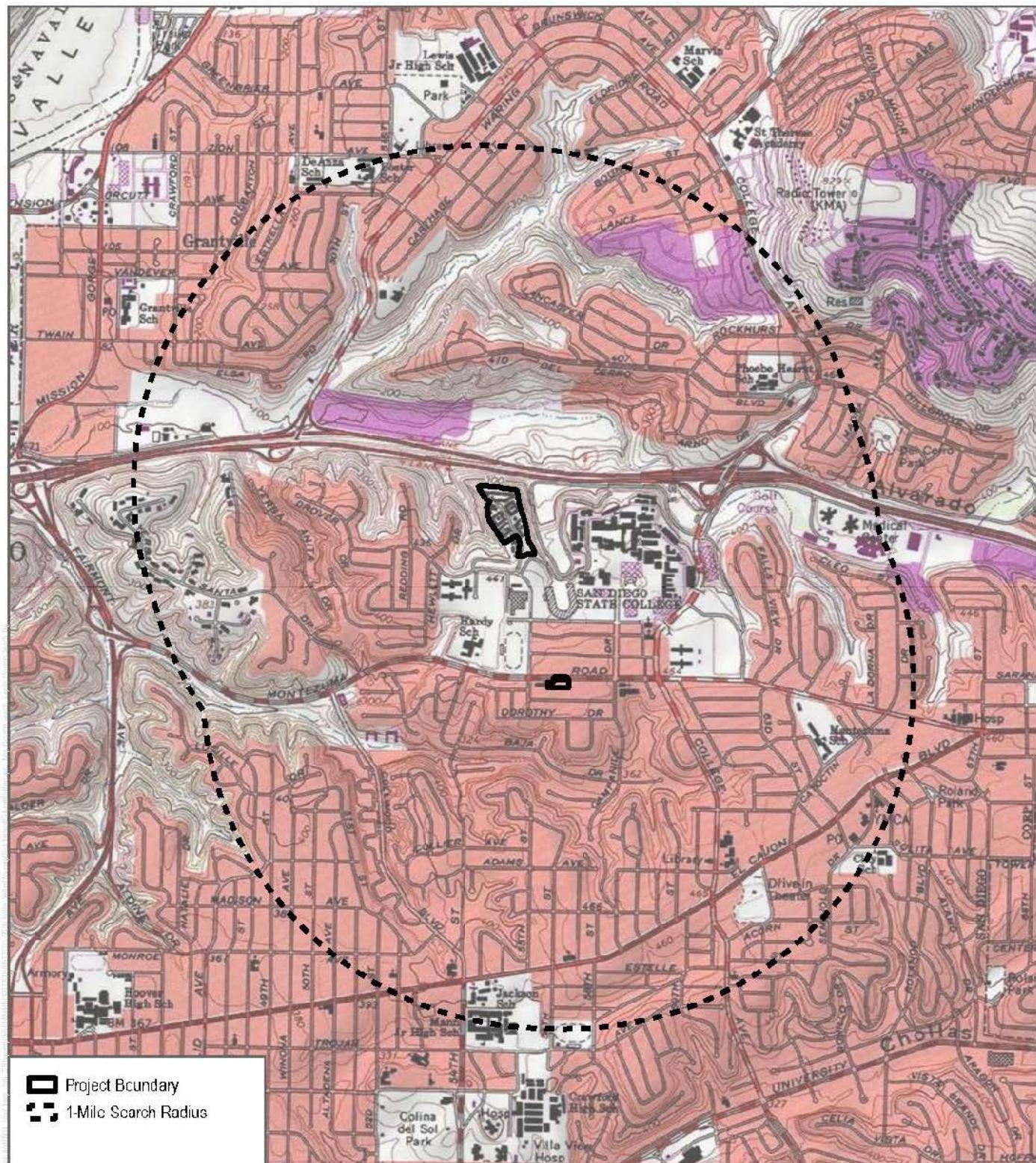
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SDSU Evolve Student Housing Project

# DUDEK

MAIN OFFICE  
605 THIRD STREET  
ENCINITAS, CALIFORNIA 92024  
T 800.450.1818 F 760.632.0164

August 28, 2024

PN 15464.12

Mr. Ray Teran, Resource Manager Director  
Viejas Band of Kumeyaay Indians  
1 Viejas Grade Rd.  
Alpine, CA 91901

**Subject: Information Request for the Evolve Student Housing Project, San Diego State University, City of San Diego, California**

Dear Mr. Teran,

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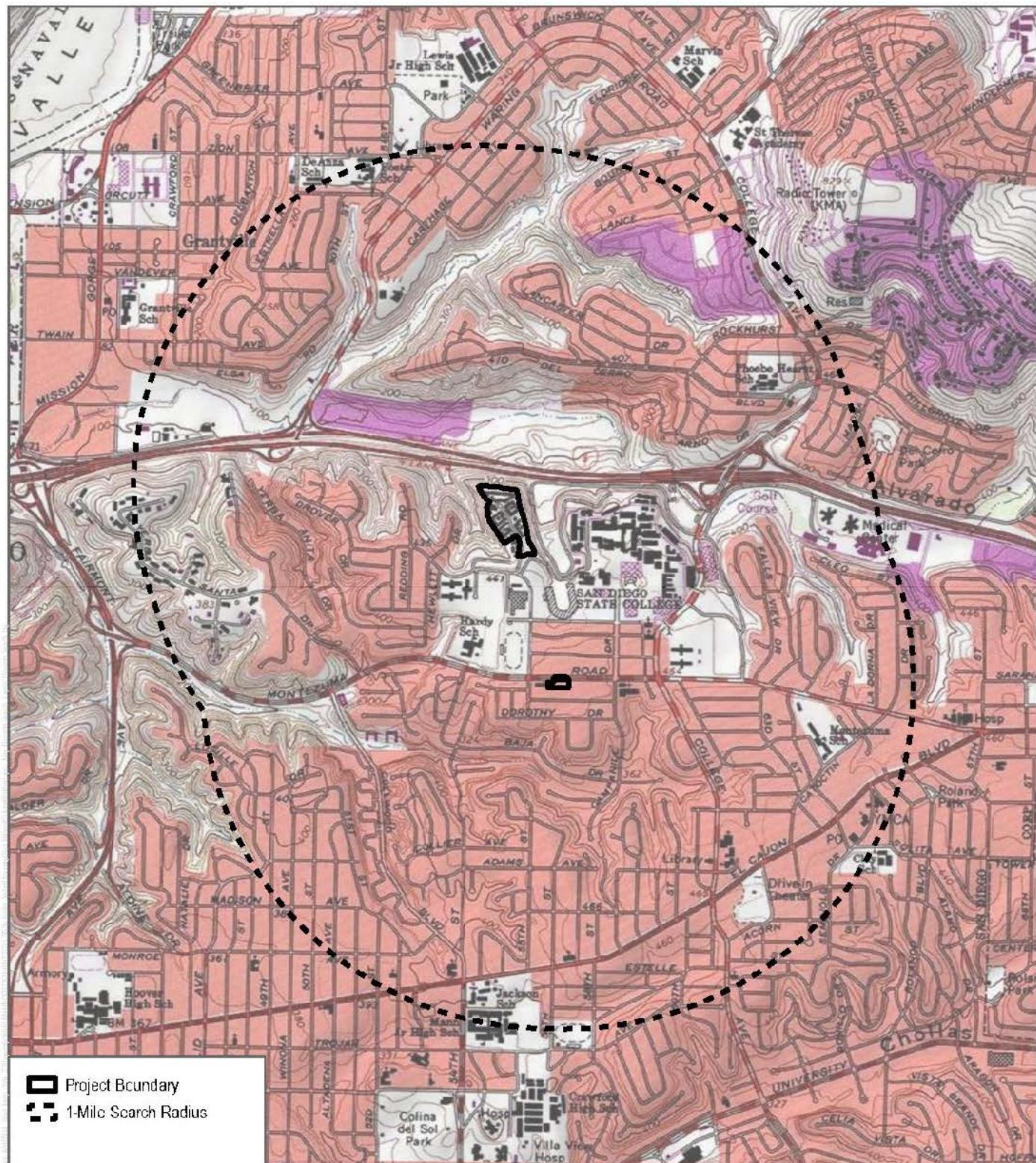
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 Township 16S; Range 2W; Sections 15, 22

**DUDEK** 1.24,000 0 250 500 Meters

Records Search

SDSU Evolve Student Housing Project



## SAN PASQUAL BAND OF MISSION INDIANS

### SAN PASQUAL RESERVATION

September 25, 2024

#### TRIBAL COUNCIL

Stephen W. Cope  
Tribal Chairman

Victoria Diaz  
Vice Chair

Jenny Alto  
Secretary-Treasurer

Roberta Cameron  
Councilmember

Joyce L. Stein  
Councilmember

DUDEK

RE: Student Housing Project

Dear Ms Murillo,

The San Pasqual Band of Mission Indians Tribal Historic Preservation Office responded to notification of the project referenced above. This letter constitutes our response on behalf of Desiree M. Whitman THPO for the San Pasqual Band of Mission Indians.

We have consulted our maps and determined that the project as described is not within the boundaries of the recognized San Pasqual Indian Reservation. However, it is within the territory's boundaries that the tribe considers its TUA Traditional Use Area. Furthermore, As the project progresses, we would like to engage in formal government-to-government consultation under Section 106 so that San Pasqual can have a voice in developing the measures that will be taken to protect these sites and mitigate any adverse impacts. We would appreciate access to any cultural resource reports that have been or will be generated during the environmental review process so we can contribute most effectively to the consultation process. San Pasqual can provide cultural monitoring for this project.

We appreciate your involvement with your initiative and look forward to working with you on future efforts. If you have questions or need additional information, please do not hesitate to contact me by telephone at 760-651-5142 or [angelinag@sanpasqualtribe.org](mailto:angelinag@sanpasqualtribe.org)

Sincerely,

Angelina Gutierrez  
Tribal Historic Preservation Office, Monitor Supervisor  
San Pasqual Band of Mission Indians