



## **ATTACHMENT D**

### **ENVIRONMENTAL IMPACT REPORT**

#### **APPENDIX D**

#### **ARCHAEOLOGICAL RESOURCES**

#### **INVENTORY REPORT**

**APPENDIX D**  
*Archaeological Resources Inventory Report*



April 14, 2023

13383

Joe Hughes  
Hughes Circuits, Inc.  
546 South Pacific Street  
San Marcos, California 92078

**Subject: Archaeological Resources Inventory Report – Negative Findings for the Hughes Circuits Expansion Project, City of San Marcos, California**

Dear Mr. Hughes:

This letter documents the negative findings archaeological resources inventory conducted by Dudek for the Hughes Circuits Expansion Project (Project), located in the City of San Marcos, California (Figure 1). The Project would consist of the development of a manufacturing building on a vacant lot adjacent to 546 South Pacific Street. The City of San Marcos (City) is the lead agency responsible for compliance with the California Environmental Quality Act (CEQA). In accordance with CEQA, Dudek performed a Phase I cultural resources inventory for the entire Project area. The Project area consists of an approximately 10.46-acres covering two parcels east of South Pacific Street (Assessor's Parcel Numbers 219-223-20-00 and 219-223-22-00) (Figure 2).

Dudek conducted a records search for the proposed project including a surrounding one-mile radius buffer at the South Coastal Information Center (SCIC). The records search did not identify any cultural resources within the Project area; however, eight cultural resources were identified within the one-mile radius. A Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search was requested and results were negative. Outreach letters were mailed to all Native American group representatives included on the NAHC contact list and three responses have been received to date.

An intensive pedestrian survey of the Project area did not identify any cultural or built environment resources. While no cultural resources were identified within the Project area, the review of aerial photographs reveals that a majority of the Project area was not highly disturbed by earth moving activities. In addition, two tributaries are located within the Project area, which would have been an attractive resource for prehistoric people. Reoccurring alluvial action and flooding serve to support the development and presence of cultural deposits in the area. Since there are alluvial soils present throughout the Project area, there is a moderate potential that buried cultural resources deposits may be encountered during excavation. Dudek recommends full-time archaeological and Native American monitoring of initial ground disturbance within sediments that have the potential for containing cultural resources. Monitoring is required during trenching, clearing of the ground surface, or excavation. Once excavations reach maximum depth or geologic formation or bedrock where cultural deposits are not possible, the monitoring program will be concluded.

# 1 Project Description and Location

The proposed Project is the development of a relatively flat, vacant 10.46-acre site located on the northeast corner of South Pacific Street in the western central region of the City of San Marcos, California. The Project site is located approximately one mile south of Highway 78, approximately one mile north of San Marcos High School, and approximately six miles west of Interstate 15. Adjacent land uses include mixed commercial development to the north and south, a public recreation park (Bradley Park) to the west, and undeveloped land to the east. The Las Posas Branch tributary to San Marcos Creek is located on the border of the western section of the Project area, and a second tributary runs through the Project area on the eastern side to San Marcos Creek. The Project site falls within Section 16 of Township 12 South, Range 3 West of the San Marcos, California U.S. Geological Survey 7.5-minute topographic quadrangle (Figure 1).

The proposed Project consists of the development of a 67,410-square foot manufacturing building to support the expansion of the existing operations of Hughes Circuits Inc., currently located adjacent to the proposed Project site to the south, at 546 South Pacific Street. The 67,410-square foot building includes a 56,310-square foot manufacturing/warehouse space on the first floor, a 11,100-square foot office on the mezzanine, and 72 parking spaces. Stormwater basins and associated landscaping would be incorporated along the perimeter of the proposed manufacturing building. The Project area consists of an approximately 10.46-acres covering two parcels east of South Pacific Street (Assessor's Parcel Numbers 219-223-20-00 and 219-223-22-00) (Figure 2). The area surveyed was approximately 14 acres, but the Project area has since been reduced to 10.46 acres.

## 2 Regulatory Framework

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

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

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

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

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the NRHP, and properties listed or formally designated as eligible for listing on the NRHP are automatically listed on the CRHR, as are the State Historical Landmarks numbered 770 or higher and California Points of Historical Interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys. The State Historic Preservation Officer maintains the CRHR.

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

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

## 2.3 California Native American Graves Protection and Repatriation Act

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

## 2.4 California Environmental Quality Act

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

1. California Public Resources Code section 21083.2(g): Defines “unique archaeological resource.”
2. California Public Resources Code section 21084.1 and CEQA Guidelines section 15064.5(a): Define historical resources. In addition, CEQA Guidelines section 15064.5(b) defines the phrase “substantial adverse change in the significance of an historical resource;” it also defines the circumstances when a project would materially impair the significance of a historical resource.
3. California Public Resources Code section 5097.98 and CEQA Guidelines section 15064.5(e): Set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated ceremony.

4. California Public Resources Code sections 21083.2(b)-(c) and CEQA Guidelines section 15126.4: Provide information regarding the mitigation framework for archaeological and historic resources, including options of preservation-in-place mitigation measures; preservation-in-place is the preferred manner of mitigating impacts to significant archaeological sites because it maintains the relationship between artifacts and the archaeological context, and may also help avoid conflict with religious or cultural values of groups associated with the archaeological site(s).

Under CEQA, a project may have a significant effect on the environment if it may cause “a substantial adverse change in the significance of an historical resource” (California Public Resources Code section 21084.1; CEQA Guidelines section 15064.5(b)). If a site is either listed or eligible for listing in the CRHR, or if it is included in a local register of historic resources, or identified as significant in a historical resources survey (meeting the requirements of California Public Resources Code section 5024.1(q)), it is a “historical resource” and is presumed to be historically or culturally significant for purposes of CEQA (California Public Resources Code section 21084.1; CEQA Guidelines section 15064.5(a)). The lead agency is not precluded from determining that a resource is a historical resource even if it does not fall within this presumption (California Public Resources Code section 21084.1; CEQA Guidelines section 15064.5(a)).

A “substantial adverse change in the significance of an historical resource” reflecting a significant effect under CEQA means “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired” (CEQA Guidelines section 15064.5(b)(1); California Public Resources Code section 5020.1(q)). In turn, the significance of a historical resource is materially impaired when a project:

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

See Section 2.7, below for a discussion of the CEQA guidelines for determining significance and mitigating impacts to unique archaeological resources.

## 2.5 California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98

CEQA Guidelines Section 150064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. As described below, these procedures are detailed in California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98.

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

## 2.6 Assembly Bill 52

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

1. listed or eligible for listing in the CRHR or a local register of historical resources as defined in PRC Section 5020.1(k), or
2. determined by a lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in PRC Section 5024.1(c).

## 2.7 Guidelines for Determining Significance

Section 15064.5(c) of CEQA applies to effects on archaeological sites and contains the following additional provisions regarding archaeological sites:

- When a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource, as defined in subsection (a).
- If a lead agency determines that the archaeological site is a historical resource, it shall refer to the provisions of Section 21084.1 of the Public Resources Code, and this section, Section 15126.4 of the Guidelines, and the limits contained in Section 21083.2 of the Public Resources Code do not apply.
- If an archaeological site does not meet the criteria defined in subsection (a), but does meet the definition of a unique archaeological resource in Section 21083.2 of the Public Resources Code, the site shall be treated in accordance with the provisions of section 21083.2. The time and cost limitations described in Public Resources Code Section 21083.2 (c–f) do not apply to surveys and site evaluation activities intended to determine whether the project location contains unique archaeological resources.

- If an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment. It shall be sufficient that both the resource and the effect on it are noted in the Initial Study or Environmental Impact Report (EIR), if one is prepared to address impacts on other resources, but they need not be considered further in the CEQA process.

Section 15064.5(d) and (e) contain additional provisions regarding human remains. Regarding Native American human remains, paragraph (d) provides:

When an initial study identifies the existence of, or the probable likelihood of, Native American human remains within the project, a lead agency shall work with the appropriate Native Americans as identified by the Native American Heritage Commission as provided in Public Resources Code SS5097.98. The applicant may develop an agreement for treating or disposing of, with appropriate dignity, the human remains and any items associated with Native American burials with the appropriate Native Americans as identified by the Native American Heritage Commission. Action implementing such an agreement is exempt from:

1. The general prohibition on disinterring, disturbing, or removing human remains from any location other than a dedicated cemetery (Health and Safety Code Section 7050.5); and
2. The requirement of CEQA and the Coastal Act.

Under CEQA, an EIR is required to evaluate any impacts on unique archaeological resources (California Public Resources Code section 21083.2.) A “unique archaeological resource” is defined as:

[A]n 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.

(California Public Resources Code section 21083.2(g)). An impact to a non-unique archaeological resource is not considered a significant environmental impact and such non-unique resources need not be further addressed in the EIR (Public Resources Code section 21083.2(a); CEQA Guidelines section 15064.5(c)(4)).

As stated above, CEQA contains rules for mitigation of “unique archaeological resources.” For example, “[i]f 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.” (Pub. Resources Code section 21083.2(b)(1)-(4).)

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.”

The rules for mitigating impacts to archaeological resources to qualify as “historic resources” are slightly different. According to CEQA Guidelines section 15126.4(b), “[p]ublic agencies should, whenever feasible, seek to avoid damaging effects on any historic resource of an archaeological nature. The following factors shall be considered and discussed in an EIR for a project involving such an archaeological site:

- 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.

Thus, although section 21083.2 of the Public Resources Code, in addressing “unique archaeological sites,” provides for specific mitigation options “in no order of preference,” CEQA Guidelines section 15126.4(b), in addressing “historical resources of an archaeological nature,” provides that “[p]reservation in place is the preferred manner of mitigating impacts to archaeological sites.”

Under CEQA, “[w]hen data recovery through excavation is the only feasible mitigation,” the lead agency may cause to be prepared and adopt a “data recovery plan,” prior to any excavation being undertaken. The data recovery plan must make “provision for adequately recovering the scientifically consequential information from and about the historical resource.” (CEQA Guidelines section 15126.4(b)(3)(C).) The data recovery plan also “must be deposited with the California Historical Resources Regional Information Center.” (*Ibid.*) Further, “[i]f an artifact must be removed during project excavation or testing, curation may be an appropriate mitigation.” (*Ibid.*)

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).)

## 2.8 City of San Marcos General Plan

The Conservation and Open Space Element of the City’s General Plan (adopted in 2012 and updated in 2013) describes the cultural and paleontological resources, regulatory framework, and policies and plans to protect such resources (City of San Marcos 2013). The planning goals and policies are described below.

The City of San Marcos Goal COS-1, in the Goals and Policies section, consists of three policies to assist in the implementation of preserving paleontological resources. The City’s goal is to “continue to identify and evaluate cultural, historical, archaeological, paleontological, and architectural resources for protection from demolition and inappropriate actions” in compliance with CEQA guidelines (City of San Marcos 2013).

## 3 Project Background

### 3.1 Existing Conditions

The approximately 10.46-acre Project area is vacant and located on the northeast corner of South Pacific Street in the western central region of the City of San Marcos, California. Adjacent land uses include mixed commercial development to the north and south, a public recreation park (Bradley Park) to the west, and undeveloped land to the east. The Project area is relatively flat, a San Diego County Water Authority right-of-way and a dirt walking path bisect the site. Elevation ranges from approximately 520 feet above mean sea level in the eastern portion of the Project area to 535 feet above mean sea level in the northwest portion of the Project area. The Las Posas Branch tributary to San Marcos Creek is located on the border of the western section of the Project area, and a second tributary runs through the Project area on the eastern side to San Marcos Creek.

### 3.2 Prehistoric Context

Evidence for continuous human occupation in the San Diego County region spans the last 12,000 years. Various attempts to parse out variability in archaeological assemblages over this broad time frame have led to the development of several cultural chronologies; some of these are based on geologic time, most are based on temporal trends in archaeological assemblages, and others are interpretive reconstructions. Each of these reconstructions describes essentially similar trends in assemblage composition in more or less detail. This research employs a common set of generalized terms used to describe chronological trends in assemblage composition from an archaeological perspective: Paleoindian (pre-5500 BC), Archaic (8000 BC.–AD 500), Late Prehistoric (AD 500–1750), and Ethnohistoric (post-AD 1750). Native American aboriginal lifeways did not cease 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. The tribal cultural context spans all of the archaeologically based chronologies further described below.

### 3.2.1 Paleoindian Period (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 P-37-004669 (CA-SDI-4669), in La Jolla. A human burial from P-37-004669 was radiocarbon dated to 9,590–9,920 years before present (approximately 95% probability) (Hector 2007). The burial is part of a larger site complex that contained more than 29 human burials associated with an assemblage that fits the Archaic profile (i.e., large amounts of groundstone, battered cobbles, and expedient flake tools). In contrast, typical Paleoindian assemblages include large stemmed projectile points, high proportions of formal lithic tools, bifacial lithic reduction strategies, and relatively small proportions of groundstone tools. Prime examples of this pattern are sites that were studied by Emma Lou Davis (1978) on China Lake Naval Air Weapons Station near Ridgecrest, California. These sites contained fluted and unfluted stemmed points and large numbers of formal flake tools (e.g., shaped scrapers, blades). Other typical Paleoindian sites include the Komodo site (MNO-679)—a multicomponent fluted point site, and MNO-680—a single component Great Basin stemmed point site (Basgall et al. 2002). At MNO-679 and MNO-680, groundstone tools were rare while finely made projectile points were common.

Turning back to coastal Southern California, the fact that some of the earliest dated assemblages are dominated by processing tools runs counter to traditional notions of mobile hunter-gatherers traversing the landscape for highly valued prey. Evidence for the latter—that is, typical Paleoindian assemblages—may have been located along the coastal margin at one time, prior to glacial desiccation and a rapid rise in sea level during the early Holocene (pre-7500 BP) that submerged as much as 1.8 km 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 P-37-000210 (CA-SDI-210) along Agua Hedionda Lagoon, contained stemmed points similar in form to Silver Lake and Lake Mojave projectile points (pre-8000 BP) that are commonly found at sites in California's high desert (Basgall and Hall 1990). P-37-000210 yielded one corrected radiocarbon date of 8520–9520 BP (Warren et al. 2004). However, sites of this nature are extremely rare and cannot be separated from large numbers of milling tools that intermingle with old projectile point forms.

Warren et al. (2004) claimed that a biface manufacturing tradition present at the Harris site complex P-37-000149 (CA-SDI-149) is representative of typical Paleoindian occupation in the San Diego County region that possibly dates between 10,365 and 8200 BC (Warren et al. 2004, p. 26). Termed San Dieguito (Rogers 1945), assemblages at the Harris site are qualitatively distinct from most others in the San Diego County 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 County 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 1993).

### 2.2.2 Archaic Period (8,000 BC - AD 500)

The more than 2500-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 County region. If San Dieguito is the only recognized Paleoindian component in the San Diego County 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 County region (Hale 2001, 2009).

The Archaic pattern is relatively easy to define with assemblages that consist primarily of processing tools: millingstones, handstones, battered cobbles, heavy crude scrapers, incipient flake-based tools, and cobble-core reduction. These assemblages occur in all environments across the San Diego County region, with little variability in tool composition. Low assemblage variability over time and space among Archaic sites has been equated with cultural conservatism (Byrd and Reddy 2002; Warren 1968; Warren et al. 2004). Despite enormous amounts of archaeological work at Archaic sites, little change in assemblage composition occurs until the bow and arrow is adopted at around AD 500, as well as ceramics at approximately the same time (Griset 1996; Hale 2009). Even then, assemblage formality remains low. After the bow is adopted, small arrow points appear in large quantities and already low amounts of formal flake tools are replaced by increasing amounts of expedient flake tools. Similarly, shaped millingstones and handstones decrease in proportion relative to expedient, unshaped groundstone tools (Hale 2009). Thus, the terminus of the Archaic period is equally as hard to define as its beginning because basic assemblage constituents and patterns of manufacturing investment remain stable, complimented only by the addition of the bow and ceramics.

### 2.2.3 Late Prehistoric Period (AD 500 - 1769)

The period of time following the Archaic and prior to Ethnohistoric times (AD 1750) is commonly referred to as the Late Prehistoric (M. 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 1978). 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 complex 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 County 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.

## 2.2.4 Ethnohistoric (post-AD 1769)

Early descriptions of the lifeways of Southern California ethnohistoric groups were provided by explorers, missionaries, administrators, and other travelers, who gave particular attention to the coastal populations (Boscana 1846; Fages 1937; Geiger and Meighan 1976; Harrington 1934; Laylander 2000). Subsequent ethnographers in the early twentieth century were able to give much more objective, detailed, and penetrating accounts. Most of the ethnographers attempted to distinguish between observations of the customs of surviving Native Americans and orally transmitted or inferred information concerning the lifeways of native groups prior to European intrusion into the region. The second of these subjects provides a terminal baseline for discussing the cultures of the region's prehistory. Despite the relatively rich ethnographic record, attempts to distinguish between the archaeological residues that were produced by the linguistically unrelated but culturally similar Luiseño and Ipai/Kumeyaay have been largely unsuccessful (Pignoli 2004; True 1966).

The first systematic ethnographic work in California was done in 1871 and 1872 by Stephen Powers (Heizer 1978); in 1877, Powers collected and printed his ethnographic observations in *Tribes of California* (Powers 1877). Prior to the work of Powers, there were limited records and accounts that might be broadly considered as ethnohistorical data, such as Boscana (1846). At the beginning of the twentieth century, Alfred L. Kroeber and others began four decades of systematic documentation of tribal ethnographies. Kroeber's (1925) monumental work on the Indians of California continues to be an authoritative source of information. It is important to note that even though there were many informants for these early ethnographies who were able to provide information from personal experiences about native life before the Europeans, a significantly large proportion of these informants were born after 1850 (Heizer and Nissen 1973); therefore, the documentation of pre-contact, aboriginal culture was being increasingly supplied by individuals born in California after considerable contact with Europeans. As Robert F. Heizer (1978) stated, this is an important issue to note when examining these ethnographies, since considerable culture change had undoubtedly occurred by 1850 among the Native American survivors of California. Nonetheless, the enormous value of the ethnographies done under Kroeber's guidance is obvious. The major sources for this review include Lowell John Bean and Florence C. Shipek (1978), Kroeber (1925), Philip S. Sparkman (1908), and Raymond White (1963).

San Marcos is situated within the ethnohistoric territory of the Native American Luiseño cultural group, according to Kroeber's study (1925; see also Rivers 1993). The Luiseño language belongs to the Cupan group of the Takic language branch of the Uto-Aztecan language family. Luiseño is a term given to Native Americans under the administration of Mission San Luis Rey, and later applied specifically to the Payomkawichum ethnic nation who were present in the region where the mission was founded. Meaning the "western people," the name Payomkawichum can also be applied to the closely related coastal Luiseño who lived north of the mission.

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

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

Like other Indigenous California groups, the primary food staple was the acorn (Bean and Shipek 1978), supplemented by other plant resources, fish, shellfish, waterfowl, and marine and terrestrial mammals. Villages were situated near reliable sources of water, needed for the daily leaching of milled acorn flour. Other plant foods included pine nuts and grass seeds, manzanita, sunflower, sage, chia, lemonade berry, wild rose, holly-leaf cherry, prickly pear, and lamb’s quarter. Large and small prey included deer, antelope, rabbit, jackrabbit, wood rat, mice, and ground squirrel, as well as quail, ducks, and other birds. Fish, such as trout, were caught in rivers and creeks.

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

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

## 4 Methods

### 4.1 Records Search

Dudek conducted a California Historical Resources Information Systems (CHRIS) records search of the Project area and a one-mile radius buffer at the South Coastal Information Center (SCIC) on January 31, 2022. The records search results indicate that 53 previous cultural resources studies have been conducted within one-mile of the Project area. Of the 53 previous studies, five studies intersect the Project area and are listed in Table 1 below. These studies consist primarily of an archaeological inventory report, two cultural resource reconnaissance reports, an Environmental Impact Report (EIR), and a records search and literature review. Overall, 100% of the Project area has been previously studied. The studies that do not intersect the area are included in Confidential Appendix A.

**Table 1. Reports Intersecting Project Area**

Report Number	Authors	Date	Title
SD-00364	RMW Paleo Associates	1988	Cultural Resources Reconnaissance of a Small Section of a Tributary of San Marcos Creek, San Marcos, San Diego County, California.
SD-01031	WESTEC Services, Inc.	1983	Archaeological Report for Business/Industrial, Richmar, Lake San Marcos and Barham/Discovery Community Plan, San Marcos, California
SD-02043	Michael Brandman Associates, Inc.	1989	Draft Environmental Impact Report San Marco Flood Control Channel San Marcos Creek/Las Posas Reach SCH #88061505
SD-02622	RMW PALEO ASSOCIATES	1991	Cultural Resource Reconnaissance in Support of Proposed Flood Control Improvements to San Marcos Creek Within The City of San Diego California
SD-14140	AFFINIS	2003	Archaeological Records Search and Literature Review, Vallecitos Water District Master Plan Update San Diego County, California

The SCIC records search did not identify any cultural resources within the Project area. The records search did identify eight cultural resources within the one-mile search radius buffer of the Project area (Table 2). Of the total eight resources identified in the one-mile buffer, six are prehistoric resources and two are historic resources. The closest resource to the Project area is CA-SDI-12735, a prehistoric habitation site located approximately 0.2 miles from the Project area. The eight cultural resources are presented in Table 1 below. Due to the sensitivity of CA-SDI-5633 and proximity of CA-SDI-12735, these resources are discussed in more detail below. No historic addresses are located within the Project area, however, two are located within the one-mile search radius. The results of the records search and all DPR forms are attached as part of Confidential Appendix A.

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

Primary Number	Trinomial	Age	Description	In/ Out of Project Area
P-37-005082	CA-SDI-5082	Prehistoric	Lithic and shell scatter	Out
P-37-005633	CA-SDI-5633	Prehistoric	Habitation site; human remains	Out
P-37-011663	CA-SDI-11663	Prehistoric	Lithic scatter	Out
P-37-012735	CA-SDI-12735	Prehistoric	Habitation site	Out
P-37-015162	N/A	Prehistoric	Isolate - Lithic flake	Out
P-37-030252	N/A	Historic	Single residential property	Out
P-37-032160	CA-SDI-20363	Prehistoric	Habitation site	Out
P-37-033557	CA-SDI-5082	Historic	Highway 395	Out

### CA-SDI-5633

CA-SDI-5633 was recorded in 1977 by R. Franklin as a prehistoric site consisting of a series of bedrock milling features extending over an area of approximately 25-square meters. Gallegos and Pignolo conducted a testing program in 1990 and determined CA-SDI-5633 to be significant under CEQA criteria. Ogden Environmental Services Inc. conducted a testing program in 1996 within the right-of-way for the San Diego Northern Railroad. A total of seven shovel test pits (STPs), two north of the tracks and five south of the tracks were excavated; one STP on the south edge of the right-of-way was positive. Gallegos & Associates excavated four STPs within the right-of-way to clarify the site boundary in 2000. In 2001, CA-SDI-5633 was recommended as eligible for nomination listing in the National Register of Historic Places (NRHP).

Gallegos & Associates conducted a data recovery program to mitigate development impacts to CA-SDI-5633 in 2002. The data recovery program consisted of four phases of excavation: 27 sample units, 25 block units, 15 rapid recovery units, and 11 mechanically excavated trenches. The data recovery program revealed artifacts such as projectile points, battered implements, cores, debitage, handstones, metate fragments, groundstone fragments, ceramic fragments, bone tools, and shell. The flake stone reduction technology at CA-SDI-5633 was exclusively related to arrow point production and rejuvenation; hunting and the preparation for hunting were major focuses of occupation at CA-SDI-5633, and the presence of milling features and shell also indicates that some food processing activities were also conducted at CA-SDI-5633. Human remains were recovered as part of the study and were repatriated for burial. Due to the presence of human remains, monitoring during construction by an archaeologist and a Native American was recommended.

In 2007, Gallegos & Associates conducted a monitoring program for construction activities performed adjacent to CA-SDI-5633 as the site was recommended for avoidance for the project. No cultural material was noted in the monitored areas adjacent to CA-SDI-5633. CA-SDI-5633 is located approximately 0.86 miles from the current proposed Project area. Due to the distance and commercial development located between CA-SDI-5633 and the Project area, the proposed current Project would not impact (directly or indirectly) CA-SDI-5633.

### CA-SDI-12735

CA-SDI-12735 was recorded in 1979 by S. Cupples as a prehistoric lithic scatter measuring 190 meters x 150 meters consisting of a handstone, over 45 flakes, a biface blank, cores, scrapers, hammerstones, and a chopper. In 1992, RMW Paleo Associates conducted three excavation units which revealed that the site had few subsurface artifacts, and it was recommended that the controlled destruction of the site be monitored by archaeologists to mitigate the cultural deposits during an upcoming grading of San Marcos Creek and its tributaries. A survey conducted by ASM Affiliates in 2006 revealed that CA-SDI-12735 was found to be in a fully-modified landscape that has been graded, disked, and subjected to stream channelization, and it was determined to be likely that the mitigative controlled destruction, as recommended by RMW Paleo Associates in 1992, had removed nearly all of the cultural deposits, destroying the site. A survey conducted by ASM Affiliates in 2010 could not relocate CA-SDI-12735 within the project area. CA-SDI-12735 is located approximately 0.22 miles from the current proposed Project area and is the closet site to the Project area. Due to the distance and commercial development located between CA-SDI-12735 and the Project area, the proposed current Project would not impact (directly or indirectly) CA-SDI-12735.

## 4.2 Archival Research

In addition to the SCIC records search, Dudek conducted an on-line review of historic aerial photographs of the Project area and general vicinity, to help determine the possible development and land use of the Project area in the past. Historic aerial photographs of the Project area were available for 1938, 1947, 1953, 1964, 1967, 1980-1991, 1993-2000, 2002, 2003, 2005, 2009, 2010, 2012, 2014, 2016, and 2018 (NETR 2022). The historical aerials from 1938 to 1967 revealed that Project area was undeveloped. By 1978, some dirt trails can be observed within the area and to the north of the area, grading was observed, and two structures were developed. By 1980, the road for South Pacific Street is developed, the surrounding properties have been graded, and residential/commercial development is present. The aerials from 1981-1984 do not reveal any changes to the area. By 1985, some light surface disturbance is observed within a small section of the southern area. The 1986 aerial shows some slight disturbance to the area in the form of dirt trails. The aerials from 1987-1994 do not reveal any changes to the area. The 1993 aerial shows some disturbance to the eastern portion of the area, and by 1996, dirt trails or a dirt road become more prominent within the area. The aerials from 1997 to 2018 do not reveal any changes to the area. The entire portion of the Project area has remained undeveloped. No historic structures are located within the Project area. The review of aerial photographs also reveals that a majority of the Project area has not been highly disturbed by earth moving activities

Historic topographic maps of the Project area were reviewed (earliest map available is 1893). A creek is observed within the western section of the Project area, however, on the 1979 topographic map, the creek is no longer observed within the Project area. The historic topographic maps do not reveal any historic structures located within the Project area.

## 4.3 Review of Geomorphological Context

Geocon Incorporated completed a geotechnical report for the Project area (Geocon Incorporated 2021). The report details the results of six exploratory trenches to a maximum depth of 14 feet on September 1, 2021, however, the report only covered a small portion of the western section of the Project area. Undocumented fill was encountered to a depth of approximately 2 feet. Alluvium was encountered in all trenches to depths ranging between 3.5 to 10 feet. Tertiary-age Santiago Formation was encountered below the undocumented fill and alluvium across the site, at depths between 3.5 and 10 feet below existing grade.

According to the U.S. Department of Agriculture Natural Resources Conservation Services (USDA 2022), three soil types are mapped in the Project area, including Las Flores loamy fine sand, 2 to 9 percent slopes, located in the central section of the Project area, Las Flores-Urban land complex, 2 to 9 percent slopes, located along the western border of the Project area, and Placentia sandy loam, thick surface, 0 to 2 percent slopes, located along the southern and eastern sections of the Project area. The Las Flores soil series generally occurs on hillslopes, formed in residuum weathered from siliceous calcareous sandstone, and are typically at an elevation of 700 feet, The Placentia soil series generally occur in settings with alluvial fans, formed in alluvium derived from granite, and are typically at elevations ranging from 50 to 2,500 feet. Reoccurring alluvial action and flooding serve to support the development and presence of cultural deposits in the area. Since there are alluvial soils present throughout the Project area, there is moderate potential for subsurface cultural resources.

## 4.4 NAHC and Tribal Correspondence

Dudek requested a NAHC search of the SLF on January 31, 2022 for the Project area. The SLF consists of a database of known Native American resources. These resources may not be included in the SCIC database. The NAHC replied on March 24, 2022 with negative results (Appendix B). The NAHC additionally provided a list of Native American tribes and individuals/organizations with traditional geographic associations that might have knowledge of cultural resources in this area.

Outreach letters were mailed on March 24, 2022 to all Native American group representatives included on the NAHC contact list (Appendix B). These letters solicited, or attempted to elicit additional information relating to Native American resources that may be impacted by the Project. Native American representatives were requested to define a general area where known resources intersect the Project area. Three responses have been received to date. A response was received from the Rincon Band of Luiseño Indians on April 25, 2022 stating that the Project is located within a culturally-sensitive area and the potential exists that the Project may impact tangible Tribal Cultural Resources (TCRs), Traditional Cultural Landscapes (TCLs), and potential Traditional Cultural Properties (TCPs). A response was received from the San Luis Rey Band of Mission Indians on April 26, 2022 stating that they are aware of cultural resources within close proximity to the proposed Project and recommends including a Luiseño Native American monitor during all ground disturbing activities. A response was received from the San Pasqual Band of Mission Indians on May 5, 2022 stating that the Project is within their Traditional Use Area. The letters have been forwarded to the City and included in this report. No other communications between Dudek and the tribes has occurred since then. The NAHC correspondence is included in Appendix B.

In compliance with Assembly Bill (AB) 52, the City, as lead agency, is responsible for conducting government to government consultation with pertinent tribal entities. The City mailed AB 52 notifications on May 3, 2022 to California Native American Tribal representatives (that have requested notification) who are traditionally or culturally affiliated with the geographic area of the proposed Project. Two tribes requested consultation under AB 52, including the Rincon Band of Luiseño Indians on May 20, 2022, and the San Luis Rey Band of Mission Indians on June 6, 2022. The Rincon Band of Luiseño Indians agreed with the mitigation measures proposed by Dudek in this report, which includes archaeological and tribal monitoring, and protocols for the discovery of cultural material and human remains. Additionally, the Rincon Band of Luiseño proposed that if export of soil is planned, consultation with the affiliated tribes will have to be initiated, and this was included in the mitigation measures. The Rincon Band of Luiseño concluded AB 52 consultation on December 20, 2022. The San Luis Rey Band agreed with the proposed measures for tribal cultural resources (CUL-MM-1 through CUL-MM-4) for the Project's environmental document. The San Luis Rey Band of Mission Indians concluded AB 52 consultation on January 12, 2023.

## 4.5 Intensive Pedestrian Survey

Dudek archaeologist Makayla Murillo conducted an intensive level pedestrian survey of the proposed Project area on February 3, 2022. Saving Sacred Sites Native American monitor VI'i Sialo'i participated in the pedestrian survey. All survey work was conducted employing standard archaeological procedures and techniques consistent with the Secretary of the Interior Standards. Five-meter interval survey transects were conducted in an east-west direction for the Project area. Within the transects, the ground surface was examined 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 Project area is relatively flat and undeveloped. Some disturbances were observed, such as a dirt road on the eastern portion of the Project area, and a drainage feature from a sewer running north to south (Figure 3). Ground visibility was poor (0-20%) in areas where the ground surface was obscured by vegetation. Approximately 75% of the Project area was obscured by grass, thistles, Hardy ice plants, and sage (Figure 4). Modern debris (e.g., refuse) is strewn throughout the Project area and a homeless encampment was observed in the bushes on the northwestern portion of the Project area. The pedestrian survey did not identify any cultural or built environment resources within the Project area.

## 5 Summary and Management Considerations

### 5.1 Archaeological Recommendations

Dudek's Phase I cultural resources inventory of the Project indicates that there is moderate sensitivity for identifying intact subsurface archaeological deposits during Project implementation. The SCIC records search, NAHC SLF search, and the pedestrian survey did not identify any cultural resources within the Project area, however, the review of aerial photographs also reveals that a majority of the Project area has not been highly disturbed by earth moving activities. In addition, two tributaries are located within the Project area, which would have been an attractive resource for prehistoric people. Reoccurring alluvial action and flooding serve to support the development and presence of cultural deposits in the area. Since there are alluvial soils present throughout the Project area, there is a moderate potential that buried cultural resources deposits may be encountered during excavation. Dudek recommends full-time archaeological and Native American monitoring of initial ground disturbance within sediments that have the potential for containing cultural resources. Monitoring is required during trenching, clearing of the ground surface, or excavation. Once excavations reach maximum depth or geologic formation or bedrock where cultural deposits are not possible, the monitoring program will be concluded.

#### Unanticipated Discovery of Archaeological Resources

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

#### Unanticipated Discovery of Human Remains

In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the County Coroner shall be immediately notified of the discovery. No further excavation or disturbance of the site or

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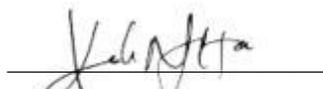
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any nearby area reasonably suspected to overlie adjacent remains shall occur until the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the NAHC in Sacramento within 24 hours. In accordance with California Public Resources Code Section 5097.98, the NAHC must immediately notify the person or persons it believes to be the MLD from the deceased Native American. The MLD shall complete inspection within 48 hours of being granted access to the site and make recommendations for the treatment and disposition, in consultation with the property owner, of the human remains.

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

Respectfully Submitted,



Keshia Montifolca, M.A., RPA  
Archaeologist

Att.: *Figure 1, Project Location*  
*Figure 2, Project Area Map*  
*Figure 3, Drainage from sewer*  
*Figure 4, Overview of western Project area*  
*National Archaeological Database Information Sheet*  
*Confidential Appendix A, SCIC Records Search Results*  
*Appendix B, Tribal Correspondence*  
cc: *Angela Pham, Micah Hale, Dudek*

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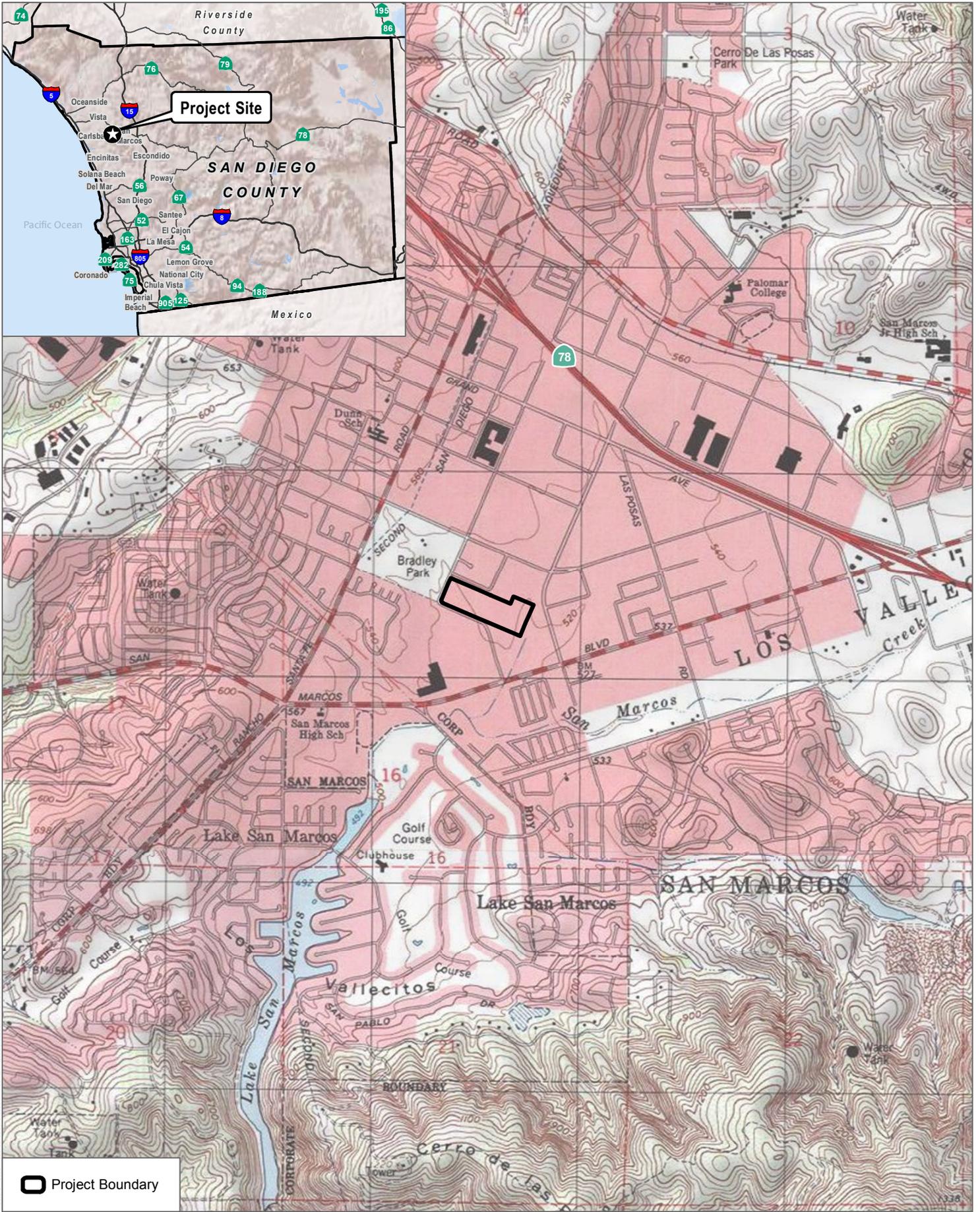
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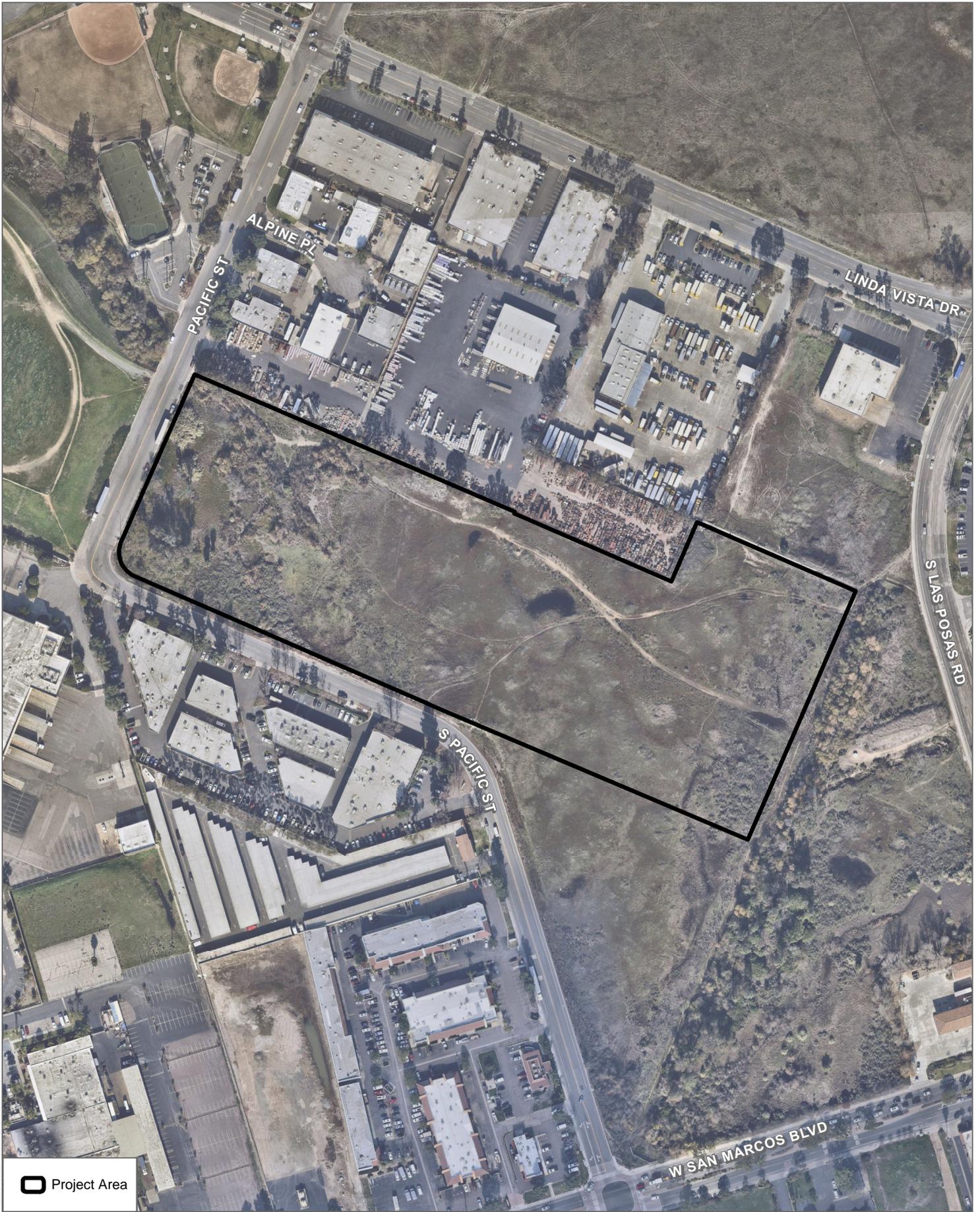
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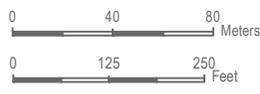
SOURCE: USGS 7.5-Minute Series San Marcos Quadrangle  
 Township 12S / Range 3W / Section 16

**FIGURE 1**  
 Project Location  
 Hughes Circuits Project



 Project Area

SOURCE: SanGIS 2019



**DUDEK** 

**FIGURE 2**  
Project Area  
Hughes Circuits Project



**Figure 3.** Drainage from sewer, view facing north.



**Figure 4.** Overview of western Project area, view facing west.

## National Archaeological Database (NADB) Information

**Authors:** Keshia Montifolca M.A., RPA and Makayla Murillo B.A.

**Firm:** Dudek

**Project Proponent:** Hughes Circuits, Inc.

**Report Date:** April 2023

**Report Title:** Archaeological Resources Inventory Report - Negative Findings for the Hughes Circuits Expansion Project

**Type of Study:** Cultural Resources Inventory

**Resources:** None

**USGS Quads:** San Marcos, California, Township 12 South, Range 3 West, Section 16

**Acreage:** 10.46

**Permit Numbers:** N/A

**Keywords:** Pedestrian Survey, Inventory, Negative, City of San Marcos, Hughes Circuits Expansion

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# **Confidential Appendix A**

## SCIC Records Search Results

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## **Appendix B**

### NAHC Correspondence and Tribal Outreach

## NATIVE AMERICAN HERITAGE COMMISSION

March 24, 2022

Makayla Murillo  
DudekVia Email to: [Mmurillo@dudek.com](mailto:Mmurillo@dudek.com) & [apham@dudek.com](mailto:apham@dudek.com)**Re: Hughes Circuits MND (13383) 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: [Andrew.Green@nahc.ca.gov](mailto:Andrew.Green@nahc.ca.gov).

Sincerely,

Andrew Green  
Cultural Resources Analyst

Attachment

CHAIRPERSON  
**Laura Miranda**  
LuiseñoVICE CHAIRPERSON  
**Reginald Pagaling**  
ChumashPARLIAMENTARIAN  
**Russell Attebery**  
KarukSECRETARY  
**Sara Dutschke**  
MiwokCOMMISSIONER  
**William Mungary**  
Paiute/White Mountain  
ApacheCOMMISSIONER  
**Isaac Bojorquez**  
Ohlone-CostanoanCOMMISSIONER  
**Buffy McQuillen**  
Yokayo Pomo, Yuki,  
NomlakiCOMMISSIONER  
**Wayne Nelson**  
LuiseñoCOMMISSIONER  
**Stanley Rodriguez**  
KumeyaayEXECUTIVE SECRETARY  
**Christina Snider**  
Pomo**NAHC HEADQUARTERS**  
1550 Harbor Boulevard  
Suite 100  
West Sacramento,  
California 95691  
(916) 373-3710  
[nahc@nahc.ca.gov](mailto:nahc@nahc.ca.gov)  
[NAHC.ca.gov](http://NAHC.ca.gov)

**Native American Heritage Commission  
Native American Contact List  
San Diego County  
3/24/2022**

**Barona Group of the Capitan Grande**

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

**Campo Band of Diegueno Mission Indians**

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

**Ewiiapaayp Band of Kumeyaay Indians**

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

**Ewiiapaayp Band of Kumeyaay Indians**

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

**Iipay Nation of Santa Ysabel**

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

**Iipay Nation of Santa Ysabel**

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

**Inaja-Cosmit Band of Indians**

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

**Jamul Indian Village**

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

**Jamul Indian Village**

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

**Kwaaymii Laguna Band of Mission Indians**

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

**La Jolla Band of Luiseno Indians**

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

**La Posta Band of Diegueno Mission Indians**

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

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

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Hughes Circuits MND (13383) Project, San Diego County.

**Native American Heritage Commission  
Native American Contact List  
San Diego County  
3/24/2022**

**La Posta Band of Diegueno  
Mission Indians**

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

**Manzanita Band of Kumeyaay  
Nation**

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

**Mesa Grande Band of Diegueno  
Mission Indians**

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

**Pala Band of Mission Indians**

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

**Pauma Band of Luiseno Indians**

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

**Pechanga Band of Indians**

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

**Pechanga Band of Indians**

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

**Rincon Band of Luiseno Indians**

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

**Rincon Band of Luiseno Indians**

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

**San Luis Rey Band of Mission  
Indians**

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

**San Luis Rey Band of Mission  
Indians**

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

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**Native American Heritage Commission  
Native American Contact List  
San Diego County  
3/24/2022**

**San Pasqual Band of Diegueno  
Mission Indians**

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

**Sycuan Band of the Kumeyaay  
Nation**

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

**San Pasqual Band of Diegueno  
Mission Indians**

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

**Viejas Band of Kumeyaay  
Indians**

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

**Soboba Band of Luiseno  
Indians**

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

**Viejas Band of Kumeyaay  
Indians**

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

**Soboba Band of Luiseno  
Indians**

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

**Sycuan Band of the Kumeyaay  
Nation**

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

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This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Hughes Circuits MND (13383) Project, San Diego County.

March 24, 2022

13383

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

Subject: Information Request for the Hughes Circuits Expansion Project, City of San Marcos, California

Dear Mr. Romero,

The proposed Hughes Circuits Expansion Project is located in the City of San Marcos, California. The proposed project consists of the development of a 67,410 square foot manufacturing building to support the expansion of the existing operations of Hughes Circuits Inc., currently located adjacent to the proposed project site to the south, at 546 South Pacific Street. The 67,410 square foot building includes a 56,310 square foot manufacturing/warehouse space on the first floor, a 11,100 square foot office on the mezzanine, and 72 parking spaces. Stormwater basins and associated landscaping would be incorporated along the perimeter of the proposed manufacturing building. The project site falls within Section 16 of Township 12 South, Range 3 West of the San Marcos, California 7.5-minute Quadrangle.

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

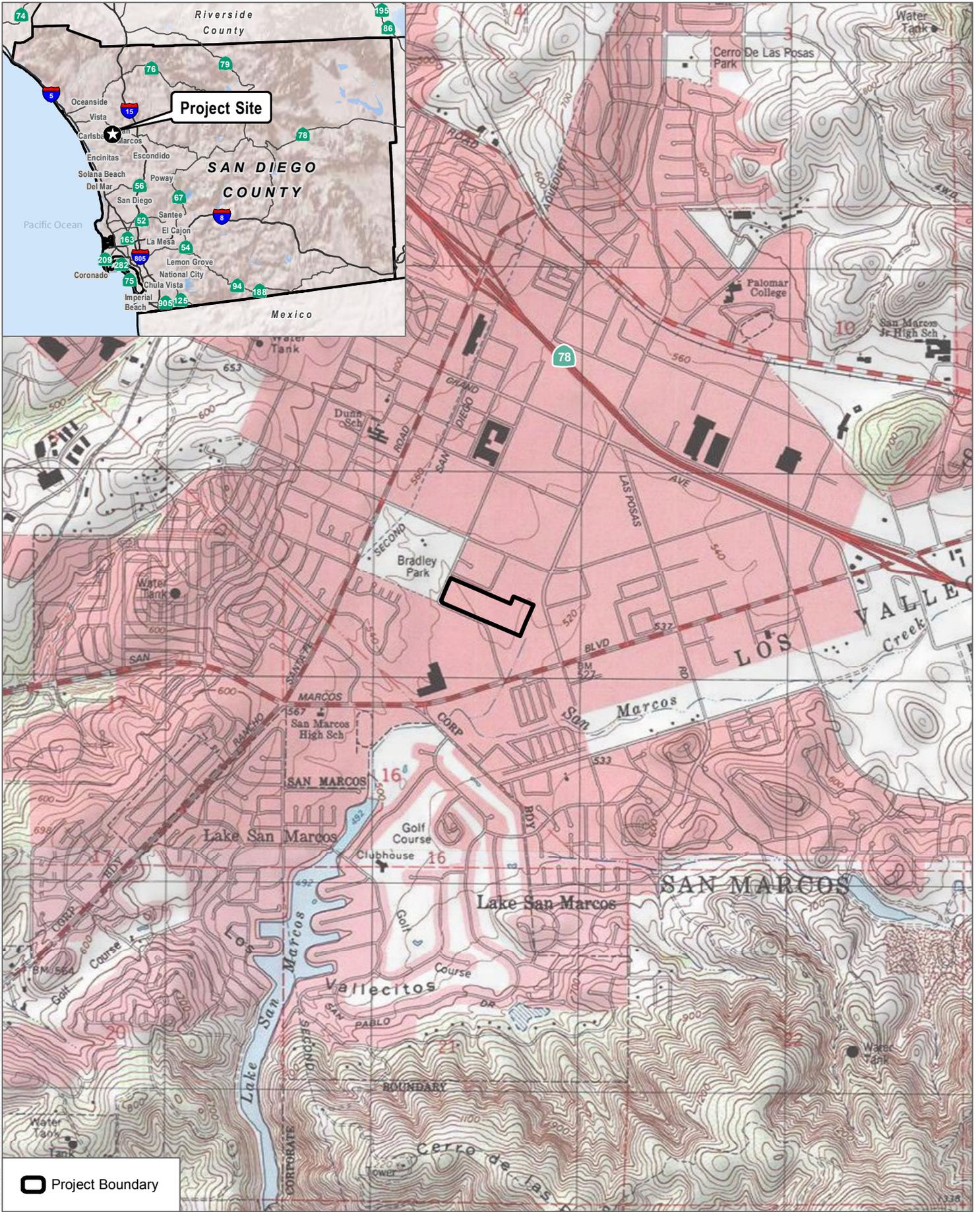
If you have any information or concerns pertaining to such information, please contact me.

Respectfully,



---

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



SOURCE: USGS 7.5-Minute Series San Marcos Quadrangle  
Township 12S / Range 3W / Section 16

**FIGURE 1**  
**Project Location**  
Hughes Circuits Project

March 24, 2022

13383

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

Subject: Information Request for the Hughes Circuits Expansion Project, City of San Marcos, California

Dear Mr. Goff,

The proposed Hughes Circuits Expansion Project is located in the City of San Marcos, California. The proposed project consists of the development of a 67,410 square foot manufacturing building to support the expansion of the existing operations of Hughes Circuits Inc., currently located adjacent to the proposed project site to the south, at 546 South Pacific Street. The 67,410 square foot building includes a 56,310 square foot manufacturing/warehouse space on the first floor, a 11,100 square foot office on the mezzanine, and 72 parking spaces. Stormwater basins and associated landscaping would be incorporated along the perimeter of the proposed manufacturing building. The project site falls within Section 16 of Township 12 South, Range 3 West of the San Marcos, California 7.5-minute Quadrangle.

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

Respectfully,



---

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

March 24, 2022

13383

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

Subject: Information Request for the Hughes Circuits Expansion Project, City of San Marcos, California

Dear Mr. Pinto,

The proposed Hughes Circuits Expansion Project is located in the City of San Marcos, California. The proposed project consists of the development of a 67,410 square foot manufacturing building to support the expansion of the existing operations of Hughes Circuits Inc., currently located adjacent to the proposed project site to the south, at 546 South Pacific Street. The 67,410 square foot building includes a 56,310 square foot manufacturing/warehouse space on the first floor, a 11,100 square foot office on the mezzanine, and 72 parking spaces. Stormwater basins and associated landscaping would be incorporated along the perimeter of the proposed manufacturing building. The project site falls within Section 16 of Township 12 South, Range 3 West of the San Marcos, California 7.5-minute Quadrangle.

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

Respectfully,



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

March 24, 2022

13383

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

Subject: Information Request for the Hughes Circuits Expansion Project, City of San Marcos, California

Dear Mr. Garcia,

The proposed Hughes Circuits Expansion Project is located in the City of San Marcos, California. The proposed project consists of the development of a 67,410 square foot manufacturing building to support the expansion of the existing operations of Hughes Circuits Inc., currently located adjacent to the proposed project site to the south, at 546 South Pacific Street. The 67,410 square foot building includes a 56,310 square foot manufacturing/warehouse space on the first floor, a 11,100 square foot office on the mezzanine, and 72 parking spaces. Stormwater basins and associated landscaping would be incorporated along the perimeter of the proposed manufacturing building. The project site falls within Section 16 of Township 12 South, Range 3 West of the San Marcos, California 7.5-minute Quadrangle.

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

Respectfully,



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

March 24, 2022

13383

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

Subject: Information Request for the Hughes Circuits Expansion Project, City of San Marcos, California

Dear Mr. Perez,

The proposed Hughes Circuits Expansion Project is located in the City of San Marcos, California. The proposed project consists of the development of a 67,410 square foot manufacturing building to support the expansion of the existing operations of Hughes Circuits Inc., currently located adjacent to the proposed project site to the south, at 546 South Pacific Street. The 67,410 square foot building includes a 56,310 square foot manufacturing/warehouse space on the first floor, a 11,100 square foot office on the mezzanine, and 72 parking spaces. Stormwater basins and associated landscaping would be incorporated along the perimeter of the proposed manufacturing building. The project site falls within Section 16 of Township 12 South, Range 3 West of the San Marcos, California 7.5-minute Quadrangle.

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Respectfully,



---

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

March 24, 2022

13383

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

Subject: Information Request for the Hughes Circuits Expansion Project, City of San Marcos, California

Dear Ms. Osuna,

The proposed Hughes Circuits Expansion Project is located in the City of San Marcos, California. The proposed project consists of the development of a 67,410 square foot manufacturing building to support the expansion of the existing operations of Hughes Circuits Inc., currently located adjacent to the proposed project site to the south, at 546 South Pacific Street. The 67,410 square foot building includes a 56,310 square foot manufacturing/warehouse space on the first floor, a 11,100 square foot office on the mezzanine, and 72 parking spaces. Stormwater basins and associated landscaping would be incorporated along the perimeter of the proposed manufacturing building. The project site falls within Section 16 of Township 12 South, Range 3 West of the San Marcos, California 7.5-minute Quadrangle.

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Respectfully,



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

March 24, 2022

13383

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 Hughes Circuits Expansion Project, City of San Marcos, California

Dear Mr. Linton,

The proposed Hughes Circuits Expansion Project is located in the City of San Marcos, California. The proposed project consists of the development of a 67,410 square foot manufacturing building to support the expansion of the existing operations of Hughes Circuits Inc., currently located adjacent to the proposed project site to the south, at 546 South Pacific Street. The 67,410 square foot building includes a 56,310 square foot manufacturing/warehouse space on the first floor, a 11,100 square foot office on the mezzanine, and 72 parking spaces. Stormwater basins and associated landscaping would be incorporated along the perimeter of the proposed manufacturing building. The project site falls within Section 16 of Township 12 South, Range 3 West of the San Marcos, California 7.5-minute Quadrangle.

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Respectfully,



---

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



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

March 24, 2022

13383

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

Subject: Information Request for the Hughes Circuits Expansion Project, City of San Marcos, California

Dear Ms. Cumper,

The proposed Hughes Circuits Expansion Project is located in the City of San Marcos, California. The proposed project consists of the development of a 67,410 square foot manufacturing building to support the expansion of the existing operations of Hughes Circuits Inc., currently located adjacent to the proposed project site to the south, at 546 South Pacific Street. The 67,410 square foot building includes a 56,310 square foot manufacturing/warehouse space on the first floor, a 11,100 square foot office on the mezzanine, and 72 parking spaces. Stormwater basins and associated landscaping would be incorporated along the perimeter of the proposed manufacturing building. The project site falls within Section 16 of Township 12 South, Range 3 West of the San Marcos, California 7.5-minute Quadrangle.

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Respectfully,

---

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

March 24, 2022

13383

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

Subject: Information Request for the Hughes Circuits Expansion Project, City of San Marcos, California

Dear Ms. Pinto,

The proposed Hughes Circuits Expansion Project is located in the City of San Marcos, California. The proposed project consists of the development of a 67,410 square foot manufacturing building to support the expansion of the existing operations of Hughes Circuits Inc., currently located adjacent to the proposed project site to the south, at 546 South Pacific Street. The 67,410 square foot building includes a 56,310 square foot manufacturing/warehouse space on the first floor, a 11,100 square foot office on the mezzanine, and 72 parking spaces. Stormwater basins and associated landscaping would be incorporated along the perimeter of the proposed manufacturing building. The project site falls within Section 16 of Township 12 South, Range 3 West of the San Marcos, California 7.5-minute Quadrangle.

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Respectfully,



---

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

March 24, 2022

13383

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

Subject: Information Request for the Hughes Circuits Expansion Project, City of San Marcos, California

Dear Ms. Lucas,

The proposed Hughes Circuits Expansion Project is located in the City of San Marcos, California. The proposed project consists of the development of a 67,410 square foot manufacturing building to support the expansion of the existing operations of Hughes Circuits Inc., currently located adjacent to the proposed project site to the south, at 546 South Pacific Street. The 67,410 square foot building includes a 56,310 square foot manufacturing/warehouse space on the first floor, a 11,100 square foot office on the mezzanine, and 72 parking spaces. Stormwater basins and associated landscaping would be incorporated along the perimeter of the proposed manufacturing building. The project site falls within Section 16 of Township 12 South, Range 3 West of the San Marcos, California 7.5-minute Quadrangle.

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Respectfully,



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Keshia Montifolca, M.A., RPA  
Archaeologist  
**DUDEK**  
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March 24, 2022

13383

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

Subject: Information Request for the Hughes Circuits Expansion Project, City of San Marcos, California

Dear Ms. Contreras,

The proposed Hughes Circuits Expansion Project is located in the City of San Marcos, California. The proposed project consists of the development of a 67,410 square foot manufacturing building to support the expansion of the existing operations of Hughes Circuits Inc., currently located adjacent to the proposed project site to the south, at 546 South Pacific Street. The 67,410 square foot building includes a 56,310 square foot manufacturing/warehouse space on the first floor, a 11,100 square foot office on the mezzanine, and 72 parking spaces. Stormwater basins and associated landscaping would be incorporated along the perimeter of the proposed manufacturing building. The project site falls within Section 16 of Township 12 South, Range 3 West of the San Marcos, California 7.5-minute Quadrangle.

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

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

Respectfully,



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Keshia Montifolca, M.A., RPA  
Archaeologist  
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March 24, 2022

13383

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

Subject: Information Request for the Hughes Circuits Expansion Project, City of San Marcos, California

Dear Ms. Parada,

The proposed Hughes Circuits Expansion Project is located in the City of San Marcos, California. The proposed project consists of the development of a 67,410 square foot manufacturing building to support the expansion of the existing operations of Hughes Circuits Inc., currently located adjacent to the proposed project site to the south, at 546 South Pacific Street. The 67,410 square foot building includes a 56,310 square foot manufacturing/warehouse space on the first floor, a 11,100 square foot office on the mezzanine, and 72 parking spaces. Stormwater basins and associated landscaping would be incorporated along the perimeter of the proposed manufacturing building. The project site falls within Section 16 of Township 12 South, Range 3 West of the San Marcos, California 7.5-minute Quadrangle.

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March 24, 2022

13383

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

Subject: Information Request for the Hughes Circuits Expansion Project, City of San Marcos, California

Dear Ms. Miller,

The proposed Hughes Circuits Expansion Project is located in the City of San Marcos, California. The proposed project consists of the development of a 67,410 square foot manufacturing building to support the expansion of the existing operations of Hughes Circuits Inc., currently located adjacent to the proposed project site to the south, at 546 South Pacific Street. The 67,410 square foot building includes a 56,310 square foot manufacturing/warehouse space on the first floor, a 11,100 square foot office on the mezzanine, and 72 parking spaces. Stormwater basins and associated landscaping would be incorporated along the perimeter of the proposed manufacturing building. The project site falls within Section 16 of Township 12 South, Range 3 West of the San Marcos, California 7.5-minute Quadrangle.

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March 24, 2022

13383

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

Subject: Information Request for the Hughes Circuits Expansion Project, City of San Marcos, California

Dear Ms. Santos,

The proposed Hughes Circuits Expansion Project is located in the City of San Marcos, California. The proposed project consists of the development of a 67,410 square foot manufacturing building to support the expansion of the existing operations of Hughes Circuits Inc., currently located adjacent to the proposed project site to the south, at 546 South Pacific Street. The 67,410 square foot building includes a 56,310 square foot manufacturing/warehouse space on the first floor, a 11,100 square foot office on the mezzanine, and 72 parking spaces. Stormwater basins and associated landscaping would be incorporated along the perimeter of the proposed manufacturing building. The project site falls within Section 16 of Township 12 South, Range 3 West of the San Marcos, California 7.5-minute Quadrangle.

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March 24, 2022

13383

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

Subject: Information Request for the Hughes Circuits Expansion Project, City of San Marcos, California

Dear Mr. Linton,

The proposed Hughes Circuits Expansion Project is located in the City of San Marcos, California. The proposed project consists of the development of a 67,410 square foot manufacturing building to support the expansion of the existing operations of Hughes Circuits Inc., currently located adjacent to the proposed project site to the south, at 546 South Pacific Street. The 67,410 square foot building includes a 56,310 square foot manufacturing/warehouse space on the first floor, a 11,100 square foot office on the mezzanine, and 72 parking spaces. Stormwater basins and associated landscaping would be incorporated along the perimeter of the proposed manufacturing building. The project site falls within Section 16 of Township 12 South, Range 3 West of the San Marcos, California 7.5-minute Quadrangle.

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March 24, 2022

13383

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

Subject: Information Request for the Hughes Circuits Expansion Project, City of San Marcos, California

Dear Ms. Gaughen,

The proposed Hughes Circuits Expansion Project is located in the City of San Marcos, California. The proposed project consists of the development of a 67,410 square foot manufacturing building to support the expansion of the existing operations of Hughes Circuits Inc., currently located adjacent to the proposed project site to the south, at 546 South Pacific Street. The 67,410 square foot building includes a 56,310 square foot manufacturing/warehouse space on the first floor, a 11,100 square foot office on the mezzanine, and 72 parking spaces. Stormwater basins and associated landscaping would be incorporated along the perimeter of the proposed manufacturing building. The project site falls within Section 16 of Township 12 South, Range 3 West of the San Marcos, California 7.5-minute Quadrangle.

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March 24, 2022

13383

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

Subject: Information Request for the Hughes Circuits Expansion Project, City of San Marcos, California

Dear Mr. Aguilar,

The proposed Hughes Circuits Expansion Project is located in the City of San Marcos, California. The proposed project consists of the development of a 67,410 square foot manufacturing building to support the expansion of the existing operations of Hughes Circuits Inc., currently located adjacent to the proposed project site to the south, at 546 South Pacific Street. The 67,410 square foot building includes a 56,310 square foot manufacturing/warehouse space on the first floor, a 11,100 square foot office on the mezzanine, and 72 parking spaces. Stormwater basins and associated landscaping would be incorporated along the perimeter of the proposed manufacturing building. The project site falls within Section 16 of Township 12 South, Range 3 West of the San Marcos, California 7.5-minute Quadrangle.

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March 24, 2022

13383

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

Subject: Information Request for the Hughes Circuits Expansion Project, City of San Marcos, California

Dear Mr. Macarro,

The proposed Hughes Circuits Expansion Project is located in the City of San Marcos, California. The proposed project consists of the development of a 67,410 square foot manufacturing building to support the expansion of the existing operations of Hughes Circuits Inc., currently located adjacent to the proposed project site to the south, at 546 South Pacific Street. The 67,410 square foot building includes a 56,310 square foot manufacturing/warehouse space on the first floor, a 11,100 square foot office on the mezzanine, and 72 parking spaces. Stormwater basins and associated landscaping would be incorporated along the perimeter of the proposed manufacturing building. The project site falls within Section 16 of Township 12 South, Range 3 West of the San Marcos, California 7.5-minute Quadrangle.

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March 24, 2022

13383

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

Subject: Information Request for the Hughes Circuits Expansion Project, City of San Marcos, California

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

March 24, 2022

13383

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

Subject: Information Request for the Hughes Circuits Expansion Project, City of San Marcos, California

Dear Mr. Mazzetti,

The proposed Hughes Circuits Expansion Project is located in the City of San Marcos, California. The proposed project consists of the development of a 67,410 square foot manufacturing building to support the expansion of the existing operations of Hughes Circuits Inc., currently located adjacent to the proposed project site to the south, at 546 South Pacific Street. The 67,410 square foot building includes a 56,310 square foot manufacturing/warehouse space on the first floor, a 11,100 square foot office on the mezzanine, and 72 parking spaces. Stormwater basins and associated landscaping would be incorporated along the perimeter of the proposed manufacturing building. The project site falls within Section 16 of Township 12 South, Range 3 West of the San Marcos, California 7.5-minute Quadrangle.

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March 24, 2022

13383

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

Subject: Information Request for the Hughes Circuits Expansion Project, City of San Marcos, California

Dear Ms. Madrigal,

The proposed Hughes Circuits Expansion Project is located in the City of San Marcos, California. The proposed project consists of the development of a 67,410 square foot manufacturing building to support the expansion of the existing operations of Hughes Circuits Inc., currently located adjacent to the proposed project site to the south, at 546 South Pacific Street. The 67,410 square foot building includes a 56,310 square foot manufacturing/warehouse space on the first floor, a 11,100 square foot office on the mezzanine, and 72 parking spaces. Stormwater basins and associated landscaping would be incorporated along the perimeter of the proposed manufacturing building. The project site falls within Section 16 of Township 12 South, Range 3 West of the San Marcos, California 7.5-minute Quadrangle.

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March 24, 2022

13383

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

Subject: Information Request for the Hughes Circuits Expansion Project, City of San Marcos, California

Dear ,

The proposed Hughes Circuits Expansion Project is located in the City of San Marcos, California. The proposed project consists of the development of a 67,410 square foot manufacturing building to support the expansion of the existing operations of Hughes Circuits Inc., currently located adjacent to the proposed project site to the south, at 546 South Pacific Street. The 67,410 square foot building includes a 56,310 square foot manufacturing/warehouse space on the first floor, a 11,100 square foot office on the mezzanine, and 72 parking spaces. Stormwater basins and associated landscaping would be incorporated along the perimeter of the proposed manufacturing building. The project site falls within Section 16 of Township 12 South, Range 3 West of the San Marcos, California 7.5-minute Quadrangle.

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March 24, 2022

13383

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

Subject: Information Request for the Hughes Circuits Expansion Project, City of San Marcos, California

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March 24, 2022

13383

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 Hughes Circuits Expansion Project, City of San Marcos, California

Dear Mr. Flores,

The proposed Hughes Circuits Expansion Project is located in the City of San Marcos, California. The proposed project consists of the development of a 67,410 square foot manufacturing building to support the expansion of the existing operations of Hughes Circuits Inc., currently located adjacent to the proposed project site to the south, at 546 South Pacific Street. The 67,410 square foot building includes a 56,310 square foot manufacturing/warehouse space on the first floor, a 11,100 square foot office on the mezzanine, and 72 parking spaces. Stormwater basins and associated landscaping would be incorporated along the perimeter of the proposed manufacturing building. The project site falls within Section 16 of Township 12 South, Range 3 West of the San Marcos, California 7.5-minute Quadrangle.

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March 24, 2022

13383

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 Hughes Circuits Expansion Project, City of San Marcos, California

Dear Mr. Lawson,

The proposed Hughes Circuits Expansion Project is located in the City of San Marcos, California. The proposed project consists of the development of a 67,410 square foot manufacturing building to support the expansion of the existing operations of Hughes Circuits Inc., currently located adjacent to the proposed project site to the south, at 546 South Pacific Street. The 67,410 square foot building includes a 56,310 square foot manufacturing/warehouse space on the first floor, a 11,100 square foot office on the mezzanine, and 72 parking spaces. Stormwater basins and associated landscaping would be incorporated along the perimeter of the proposed manufacturing building. The project site falls within Section 16 of Township 12 South, Range 3 West of the San Marcos, California 7.5-minute Quadrangle.

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March 24, 2022

13383

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

Subject: Information Request for the Hughes Circuits Expansion Project, City of San Marcos, California

Dear Mr. Ontiveros,

The proposed Hughes Circuits Expansion Project is located in the City of San Marcos, California. The proposed project consists of the development of a 67,410 square foot manufacturing building to support the expansion of the existing operations of Hughes Circuits Inc., currently located adjacent to the proposed project site to the south, at 546 South Pacific Street. The 67,410 square foot building includes a 56,310 square foot manufacturing/warehouse space on the first floor, a 11,100 square foot office on the mezzanine, and 72 parking spaces. Stormwater basins and associated landscaping would be incorporated along the perimeter of the proposed manufacturing building. The project site falls within Section 16 of Township 12 South, Range 3 West of the San Marcos, California 7.5-minute Quadrangle.

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March 24, 2022

13383

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

Subject: Information Request for the Hughes Circuits Expansion Project, City of San Marcos, California

Dear Mr. Vivanco,

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March 24, 2022

13383

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

Subject: Information Request for the Hughes Circuits Expansion Project, City of San Marcos, California

Dear Ms. Charlene Worrell-Elliott,

The proposed Hughes Circuits Expansion Project is located in the City of San Marcos, California. The proposed project consists of the development of a 67,410 square foot manufacturing building to support the expansion of the existing operations of Hughes Circuits Inc., currently located adjacent to the proposed project site to the south, at 546 South Pacific Street. The 67,410 square foot building includes a 56,310 square foot manufacturing/warehouse space on the first floor, a 11,100 square foot office on the mezzanine, and 72 parking spaces. Stormwater basins and associated landscaping would be incorporated along the perimeter of the proposed manufacturing building. The project site falls within Section 16 of Township 12 South, Range 3 West of the San Marcos, California 7.5-minute Quadrangle.

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March 24, 2022

13383

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

Subject: Information Request for the Hughes Circuits Expansion Project, City of San Marcos, California

Dear Mr. Martinez,

The proposed Hughes Circuits Expansion Project is located in the City of San Marcos, California. The proposed project consists of the development of a 67,410 square foot manufacturing building to support the expansion of the existing operations of Hughes Circuits Inc., currently located adjacent to the proposed project site to the south, at 546 South Pacific Street. The 67,410 square foot building includes a 56,310 square foot manufacturing/warehouse space on the first floor, a 11,100 square foot office on the mezzanine, and 72 parking spaces. Stormwater basins and associated landscaping would be incorporated along the perimeter of the proposed manufacturing building. The project site falls within Section 16 of Township 12 South, Range 3 West of the San Marcos, California 7.5-minute Quadrangle.

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March 24, 2022

13383

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

Subject: Information Request for the Hughes Circuits Expansion Project, City of San Marcos, California

Dear Mr. Christman,

The proposed Hughes Circuits Expansion Project is located in the City of San Marcos, California. The proposed project consists of the development of a 67,410 square foot manufacturing building to support the expansion of the existing operations of Hughes Circuits Inc., currently located adjacent to the proposed project site to the south, at 546 South Pacific Street. The 67,410 square foot building includes a 56,310 square foot manufacturing/warehouse space on the first floor, a 11,100 square foot office on the mezzanine, and 72 parking spaces. Stormwater basins and associated landscaping would be incorporated along the perimeter of the proposed manufacturing building. The project site falls within Section 16 of Township 12 South, Range 3 West of the San Marcos, California 7.5-minute Quadrangle.

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

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

Respectfully,



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

March 24, 2022

13383

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

Subject: Information Request for the Hughes Circuits Expansion Project, City of San Marcos, California

Dear Mr. Pingleton,

The proposed Hughes Circuits Expansion Project is located in the City of San Marcos, California. The proposed project consists of the development of a 67,410 square foot manufacturing building to support the expansion of the existing operations of Hughes Circuits Inc., currently located adjacent to the proposed project site to the south, at 546 South Pacific Street. The 67,410 square foot building includes a 56,310 square foot manufacturing/warehouse space on the first floor, a 11,100 square foot office on the mezzanine, and 72 parking spaces. Stormwater basins and associated landscaping would be incorporated along the perimeter of the proposed manufacturing building. The project site falls within Section 16 of Township 12 South, Range 3 West of the San Marcos, California 7.5-minute Quadrangle.

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

# Rincon Band of Luiseño Indians

## CULTURAL RESOURCES DEPARTMENT

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



April 25, 2022

**Sent via email: [Kmontifolca@dudek.com](mailto:Kmontifolca@dudek.com)**

Ms. Keshia Montifolca

DUDEK

Main Office

605 Third Street

Encinitas, CA 92024

**Re: Information Request for the Hughes Circuits Expansion Project, City of San Marcos, San Diego County, California**

Dear Ms. Montifolca,

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

After review of the provided documents and our internal information, the Tribe understands that the project site has been disturbed by previous development. However, the project is located within a culturally-sensitive area and we believe the potential exists the project may impact tangible Tribal Cultural Resources (TCRs), Traditional Cultural Landscapes (TCLs), and potential Traditional Cultural Properties (TCPs). The Rincon Band recommends conducting a cultural resources study, to include an archeological record search and research to identify potential historic properties. We ask that a copy of the survey will be provided to the Rincon Band for review and comment.

If you have additional questions or concerns, please do not hesitate to contact our office at your convenience at (760) 749 1092 ext. 323 or via electronic mail at [cmadrigal@rincon-nsn.gov](mailto:cmadrigal@rincon-nsn.gov). We look forward to working together to protect and preserve our cultural assets.

Sincerely,

A handwritten signature in blue ink, appearing to read "Cheryl Madrigal", is written over a light blue horizontal line.

Cheryl Madrigal

Tribal Historic Preservation Officer

Cultural Resources Manager

## SAN LUIS REY BAND OF MISSION INDIANS

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

April 26, 2022

Keshia Montifolca, M.A., RPA  
Archaeologist  
Dudek

**VIA ELECTRONIC MAIL**  
**kmontifolca@dudek.com**

**RE: SLR RESPONSE REGARDING THE PROPOSED HUGHES CIRCUITS  
EXPANSION PROJECT IN SAN MARCOS, CA AND ITS POTENTIAL  
IMPACTS TO NATIVE AMERICAN TRIBAL CULTURAL RESOURCES**

Dear Ms. Montifolca:

We, the San Luis Rey Band of Mission Indians (“Tribe”) have received and reviewed your letter dated March 23, 2022 (and inclusive maps) regarding the proposed Hughes Circuits Expansion Project in San Marcos, CA (“Project” and “Project Area”). We further understand from your letter that you are inquiring whether the Tribe possesses any information and/or concerns regarding tribal cultural resources and/or Sacred Lands in the Project Area.

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

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

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

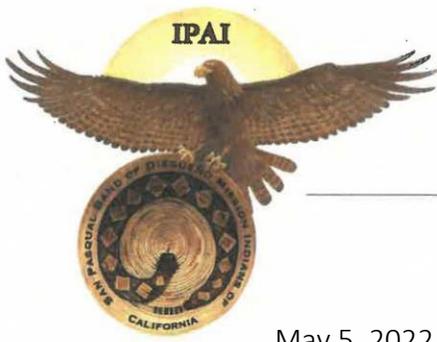
Furthermore, the Tribe requests that any and all cultural resource surveys completed in the Project Area and/or for the benefit of this Project be provided to the Tribe’s Cultural Department at 1889 Sunset Drive, Vista, CA 92081 as your earliest convenience. If digital copies

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

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

Sincerely,

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



## SAN PASQUAL BAND OF MISSION INDIANS

### SAN PASQUAL RESERVATION

May 5, 2022

#### TRIBAL COUNCIL

Stephen W. Cope  
Chairman

Justin Quis Quis  
Vice Chairman

Jenny Alto  
Secretary-Treasurer

Roberta Cameron  
Councilman

Melody S. Arviso  
Councilman

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

RE: Hughes Circuits Expansion Project of San Marcos, California

Dear Mis Montifolca,

The San Pasqual Band of Mission Indians Tribal Historic Preservation Office has received your notification of the project referenced above. This letter constitutes our response on behalf of Desiree M. Whitman THPO of the San Pasqual Band of Diegueno 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. It is, however, within the boundaries of the territory that the tribe considers its Traditional Use Area (TUA). Furthermore, we would like to engage in consultation 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 being given 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.

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)

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

# Rincon Band of Luiseño Indians

## CULTURAL RESOURCES DEPARTMENT

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



December 20, 2022

Sent via email: [jfarace@san-marcos.net](mailto:jfarace@san-marcos.net)

City of San Marcos  
1 Civic Center Drive  
San Marcos, CA 92069

**Re: Conclusion of Consultation on the Hughes SMCC, LLC Project; SDP22-0002**

Dear Mr. Farace,

This letter is written on behalf of the Rincon Band of Luiseño Indians (“Rincon Band” or “Tribe”), a federally recognized Indian tribe and sovereign government. Thank you for providing the Rincon Band with the Archaeological Survey Report and project descriptions for the above referenced project. The identified location is within the Traditional Use Area of the Luiseño people and is also within Rincon’s specific area of Historic interest.

The Tribal Historic Preservation Office (THPO) has reviewed the provided documents to identify potential impacts to cultural and tribal cultural resources. We agree with the mitigation measures proposed by Dudek in the Cultural Resources assessment, which include archaeological and tribal monitoring, a monitoring report, and protocols for discovery of cultural material and human remains. Please include in the measures, that if export of soil is planned, consultation with the affiliated Tribes will have to be initiated. We have no further comments regarding this project and can conclude consultation at this time. We do request that the Rincon Band be notified of any changes in project plans. In addition, we request a copy of the final monitoring report, when available and ask that Rincon be afforded the opportunity to monitor the ground disturbances associated with this project.

If you have additional questions or concerns, please do not hesitate to contact our office at your convenience at (760) 749 1092 or via electronic mail at [cmadriral@rincon-nsn.gov](mailto:cmadriral@rincon-nsn.gov). Thank you for the opportunity to protect and preserve our cultural assets.

Sincerely,

A handwritten signature in blue ink, appearing to read "Cheryl Madrigal".

Cheryl Madrigal  
Tribal Historic Preservation Officer  
Cultural Resources Manager

**SAN LUIS REY BAND OF MISSION INDIANS**

***1889 Sunset Drive • Vista, California 92081***

***760-724-8505 • FAX 760-724-2172***

***www.slrmissionindians.org***

1-12-2023

Joseph Farace  
Planning Manager  
City of San Marcos  
1 Civic Center Drive  
San Marcos, CA 92069

**VIA ELECTRONIC MAIL**

**RE: Confidential Communication Pursuant to California Public Resources Code section 21080.3.1 for the Hughes Circuits Project – Request to Conclude Consultation Between the City of San Marcos and SLR**

Dear Mr. Farace,

This letter is in reference to the City of San Marcos's ("City's") and the San Luis Rey Band of Mission Indians ("SLR" or "Tribe's") continued consultation for the Hughes Circuits ("Project"). This is a confidential communication between the City and SLR and should not be shared and/or duplicated without SLR's expressed written consent.

Thank you for providing SLR with the proposed mitigation measures for tribal cultural resources (CUL-MM-1 through CUL-MM-4) for the project's environmental document. The Tribe has reviewed the mitigation measures and concurs with the City that they adequately address the Tribe's concerns as discussed during our previous consultations and are culturally-appropriate as required by CEQA.

If the aforementioned mitigation measures will be the recommended mitigation measures for tribal cultural resources for this Project, then the San Luis Rey Band of Mission Indians respectfully requests to conclude consultation pursuant to AB 52. If, however, the aforementioned mitigation measures will not be recommended by the City in their *entirety* to the City's decision-making body, then please immediately contact me at 760.917-1736 for a continued consultation meeting.

Sincerely,

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