

Appendix I

Cultural Resources Report and
SHPO Concurrence Letter

Cultural Resources Report
Confidential under Separate Cover

SHPO Concurrence Letter

Identification Efforts

To support its finding, the BIA relied on a cultural resources investigation prepared by Brian F. Smith & Associates (BFSA) in 2018 and revised in 2019. The study included a review of records at the South Coastal Information Center at San Diego State University for a one-mile radius around the project area, which identified 64 previously recorded cultural resources in the vicinity but none within the boundaries of the Area of Potential Effects (APE). The Native American Heritage Commission's Sacred Lands File search returned negative results, and the BIA initiated outreach to tribes identified by the Commission. Several tribes responded, including requests to review the completed report, but no tribal representatives identified known cultural resources within the APE.

In addition to archival research and consultation, BFSA conducted an intensive pedestrian survey of the 8.5-acre parcel in August 2018. The survey, completed with a Native American monitor present, reported that the property is vacant but has been moderately to severely disturbed by previous development, demolition, and staging activities. The survey identified no cultural resources within the APE, and no subsurface testing or geoarchaeological assessment was conducted as part of the study.

Finding of Effect

The BIA has determined a finding of *no historic properties affected* pursuant to 36 CFR § 800.4(d)(1), concluding that no historic properties are present within the APE.

Comments and Recommendations

The SHPO appreciates the BIA's submittal, and the supporting materials provided. The SHPO notes the following considerations:

1. **Vertical APE Clarification:**

The submittal does not describe the vertical extent of the APE. In future submissions, please provide details regarding the anticipated depth of grading, foundation excavation, and utility installation to ensure the APE encompasses all potential effects on subsurface historic properties.

2. **Subsurface Potential:**

Although the surface survey was negative, the one-mile records search revealed a high density of prehistoric sites in the vicinity. Past disturbances do not preclude the presence of deeply buried or otherwise obscured deposits.

3. **Monitoring and Inadvertent Discoveries:**

Given the disturbed but archaeologically sensitive context, SHPO recommends that BIA have archaeological and Native American monitoring during ground disturbing activities, as initially suggested in the BFSA report. A cultural resource inadvertent discovery plan should be developed prior to construction.

4. **Survey Age:**

While the findings appear reasonable given the parcel's condition, SHPO recommends for future submissions that BIA provide justification for relying on an older report or consider updating the identification effort to confirm current conditions.

Conclusion

Pursuant to 36 CFR § 800.4(d)(1), SHPO **does not object** to a finding of *no historic properties affected* and has no further comments.

Be advised that under certain circumstances, such as unanticipated discovery or a change in project description, your agency may have additional future responsibilities for this undertaking under 36 CFR Part 800. If you require further information, please contact Jeffrey Delsescaux at (916) 894-5498 or Jeffrey.Delsescaux@parks.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Julianne Polanco', with a long horizontal stroke extending to the right.

Julianne Polanco
State Historic Preservation Officer