

City of San Marcos

Archaeological and Historical Resources Consultant Guidelines

The following guidelines are intended to assist third party consultants who prepare archaeological or architectural history inventories, surveys, evaluations, and other technical documents. These guidelines are not intended to be all-inclusive of information needed by the City to process an application. The City reserves the right to modify these guidelines or request additional information for any given project, depending on the circumstances.

1. **Minimum Qualifications:** The Principal Investigator (PI) shall meet the Secretary of the Interior's Professional Qualification Standards (PQS) that pertain to the particular area of study. The PQS standards are published in 36 CFR Part 61 and Volume 62, No 119 of the Federal Register (June 20, 1997). Technical staff working under the direct supervision of the qualified PI need not meet the above criteria.
2. **Records Searches:** The PI shall conduct a records search with the California Historical Resources Information System maintained by the California Office of Historic Preservation for the project area plus at least a radius. The radius for archaeology must be 1.0 mile around the project area, but the PI can use professional judgement on the radius for the built environment (architectural history), which can be less than 1.0 mile if warranted. The PI shall review all archaeological and built environment site records, pertinent reports, databases, historic maps, and registers within this area. Additional sources of information may be appropriate, including local and regional historical societies or archives.
3. **Tribal Outreach:** In addition, the PI shall request a current search of the Sacred Lands File and list of culturally-affiliated tribes from the California Native American Heritage Commission. Consultants shall send tribes notification letters to gauge interest or request information as part of their assessment; however, correspondence shall make clear that the outreach is not considered formal consultation under AB 52 or SB 18. Consultants shall extend the opportunity to tribes to send a representative to participate in the survey or provide information. Consultants shall wait 30 days from noticing the tribes before performing the field survey; should tribes not respond or desire to send a representative, the Consultant may move forward with the survey after 30 days.
4. **Pedestrian Surveys:** The PI shall ensure that the entire project area is subject to a pedestrian survey by qualified professionals using no greater than 25 meter transect intervals. The pedestrian survey must not be more than 5 years old at the time of submission. Any areas of the project area that are physically inaccessible shall be clearly noted as such on survey coverage maps, and the PI shall draw from other lines of evidence (e.g., records search results) to inform the conclusions.

5. **Archaeological Excavation:** Prior to initiating archaeological testing, trenching, or other forms of archaeological excavation of pre-contact sites, the PI shall develop a brief testing plan that proposes the methods and testing locations. The PI shall send the testing plan to culturally affiliated tribes listed on the NAHC list for the project and request comment within 30 days.

If no responses are received within 30 days, then the PI may proceed with testing, and the testing report shall include copies of correspondence to tribes documenting compliance with this requirement.

If a consulting tribe responds within 30 days to provide comments, the PI shall document those comments in the testing report and include copies of correspondence documenting compliance with this requirement. In addition, the PI shall incorporate those comments into the testing plan or accommodate monitoring during the testing, if requested by one or more tribes. In the event of conflicting comments, the PI shall make a reasonable effort to resolve the dispute before implementing the testing plan. If the landowner or PI denies a request by a consulting tribe, then the reason for the denial shall be documented in the testing report and the City will continue consultation under applicable law to address any significant impacts to tribal cultural resources caused by the testing.

The PI shall ensure that all tribes listed on the NAHC list are notified of the schedule of the planned testing. Consultants shall extend the opportunity to tribes to send a representative to monitor the excavation. (This requirement does not pertain to sites that are known to be non-Native American in origin.) Consultants shall wait 14 days from noticing the tribes before performing the excavation; should tribes not respond or desire to send a representative, the Consultant may move forward with the excavation after 14 days.

If any tribes express concern or objection over the results or interpretations stemming from the testing, then correspondence shall be forwarded to the City for consultation under applicable law, once consultation is initiated.

6. **Reporting:** The following represents the recommended contents and format of reports prepared for the City. Variations in format and style between and among consulting firms are allowed, as long as the content meets the following guidelines.

- a. **Title Page:** the report shall include either "Archaeological" or "Architectural History" in the title instead of "Cultural Resources." This is intended to differentiate the subject matter expertise of archaeologists and historians from tribal representatives. Because "cultural resources" can be interpreted more broadly as including tribal cultural resources, for which only tribes are the experts, consultants should avoid characterizing their reports as "cultural resources inventories," for example. If known, the title page should include the City's project number.

- b. **Table of Contents:** List all major report sections, subheadings, and appendices, with page numbers. Include a list of figures and tables.
- c. **Management Summary:** Provide a summary, no longer than one page, of the scope and findings of the study. The summary should be able to serve as a stand-alone summary that could be used in a staff report for the planning commission or city council, if necessary.
- d. **Introduction and Project Description:** Provide an overview of the project, including the size of the study area (and if different from the project area, explain), location of the project, and the horizontal and vertical limits of the area of potential effects.
- e. **Setting:** Include the following summaries. All sources of information are expected to be drawn from existing published or “gray” literature.
 - i. **Natural Setting** – provide brief overviews of the geology, landforms, soils, hydrology, vegetation, and fauna that are scaled to the undertaking size and type.
 - ii. **Cultural Setting**
 - 1. **Archaeological Context** – provide sufficient level of detail that is scaled to the undertaking size and type.
 - 2. **Historical Context** – include a brief summary of the post-contact occupation of the project vicinity, and then focus the summary on the resource types expected to be encountered.
 - 3. **Ethnohistoric Context** – this must be a separate subsection from the sections named above. Avoid using past tense to describe living cultures. Include pre-contact, contact, and post-contact information, scaled to the undertaking size and type. Draw from published ethnographies and cite all sources. Provide ethnographic place names and locations of any known or published villages in the vicinity, even if not located inside the project area.
- f. **Research Design and/ or Methods:** Generally follow the Office of Historic Preservation’s Archaeological Resource Management Reports (ARMR) Recommended Contents and Format (1990), and adapt to architectural history, if applicable. These guidelines can be found here: <https://ohp.parks.ca.gov/pages/1069/files/armr-remediated.pdf>
- g. **Findings:** Follow the Office of Historic Preservation’s ARMR format.
- h. **Discussion and/or Evaluations:** Follow the Office of Historic Preservation’s ARMR format.

- i. **Management Considerations:** Provide a brief concluding statement and make recommendations to the City on an appropriate finding of effect under CEQA. Include recommended mitigation measures, if appropriate.
- j. **References:** Follow the Office of Historic Preservation's ARMR format.
- k. **Appendices:** Any appendices that include confidential information must be clearly marked as such.