

7.0 SITE SIGNIFICANCE SUMMARY AND IMPACT ANALYSIS

The cultural resources study for the Safari Highlands Ranch Project was conducted to provide an inventory of archaeological sites within the project, to assess resources for significance, and to evaluate potential impacts represented by the planned development. As has been noted previously, the current study is the third cultural resources study for the property, the culmination of which has been the recordation of 49 cultural resources. All of the sites have been registered at the SCIC at SDSU and were tested and evaluated in accordance with the City of Escondido's environmental guidelines, following the significance criteria provided in Section 15064.5 of CEQA. The significance criteria used to evaluate the Safari Highlands Ranch sites is listed in Section 7.1.

The archaeological sites that will potentially be affected by the project were tested and evaluated based upon CEQA significance criteria. Results of the testing of the individual sites and the significance evaluations for each site projected based upon the current testing program are summarized in Table 7.0-1. Four of the sites that were tested are recommended as significant based upon CEQA criteria. For the most part, the sites that have been determined to be important were evaluated based upon their potential to provide information that would be applicable to numerous regionally important research topics. The remaining 45 sites were determined to be not CEQA-significant.

The basis for the evaluation of such a large number of sites as not significant is that these sites are characterized as minimal surface scatters or limited-use milling sites that lack subsurface deposits or further research potential. Also, none of the historic sites were found to be CEQA-significant because these lack any research potential following the site testing program. It appears that the prehistoric utilization of this general area, including that of Safari Highlands Ranch itself, is a response to the environmental setting represented by a somewhat sparse and rocky landscape, with steep slopes near the hills and marginal opportunities for focused occupation. The significance evaluations and impact status of the cultural resources are depicted on Figure 7.0-1.

The sites that have been evaluated as significant and eligible for the CRHR include the following:

- SDI-14,770
- SDI-15,072
- SDI-21,575
- SDI-21,596

These sites were found to be significant generally based upon their research potential and ability to provide important information regarding the area's prehistory. These sites, therefore, qualify as Historical Resources under Criterion D of the CRHR. These sites consistently contain a wide spectrum of features and cultural deposits that constitute an encapsulation of the material cultural of the people who have occupied this property.

Table 7.0-1
Summary of Investigations at the Safari Highlands Ranch Sites

Site Designation	Report Section	Tested	Site Type	Significant (CRHR Eligible)	Potential Direct Impacts	Cultures Represented	Surface Area (m ²)	Subsurface Area (m ²)	Max. Subsurface Depth (cm)	Total Artifacts Collected
SDI-14,770	6.1	Yes	SC	Yes	Yes	Prehistoric	19,232.8	8,988.6	70	667
SDI-15,072	6.2	Yes	SC	Yes	Yes (partial)	Prehistoric	2,323	1,343	90	83
SDI-15,074	6.3	Yes	TC	No	Yes	Historic/Prehistoric	883	347	40	158
SDI-15,081	6.4	Yes	SC	No	Yes (partial)	Prehistoric	3,585	182.2	60	34
SDI-14,772	6.5	Yes	FP	No	Yes	Prehistoric	272	-	-	1
SDI-14,773	6.6	Yes	FP	No	Yes	Prehistoric	779	-	-	4
SDI-14,776	6.7	Yes	FP	No	Yes	Prehistoric	173	-	-	-
SDI-14,779	6.8	Yes	Rock Walls	No	Yes (partial)	Historic	7,370	-	-	-
SDI-14,780	6.9	Yes	FP, Rock Walls	No	Yes (partial)	Prehistoric/Historic	1,399	-	-	-
SDI-15,075	6.10	No	FP	No	Yes	Prehistoric	-	-	-	-
SDI-15,088	6.11	Yes	FP	No	Yes	Prehistoric	466	37.9	30	9
SDI-14,768	6.12	Yes	FP	No	No	Prehistoric	573.3	-	-	2
SDI-14,769	6.13	Yes	FP	No	Yes	Prehistoric	375	-	-	-
SDI-14,771	6.14	No	FP	No	Yes	Prehistoric	-	-	-	-
SDI-14,774	6.15	Yes	FP	No	Yes	Prehistoric	608	-	-	-
SDI-14,775	6.16	Yes	FP	No	Yes	Prehistoric	310	-	-	-
SDI-14,943	6.17	Yes	FP	No	Yes	Prehistoric	150	-	-	-
SDI-15,078	6.18	Yes	Rock Wall	No	Yes	Historic	299.1	-	-	-
SDI-15,080	6.19	No	FP	No	Yes	Prehistoric	-	-	-	-
SDI-15,082	6.20	Yes	FP	No	No	Prehistoric	61	-	-	-
SDI-15,085	6.21	Yes	FP	No	Yes	Prehistoric	20	-	-	-
SDI-15,089	6.22	Yes	FP	No	Yes	Prehistoric	3,006	-	-	44
SDI-15,091	6.23	No	-	No	Yes	Historic	-	-	-	-
SDI-15,201	6.24	Yes	FP	No	No	Prehistoric	232	-	-	-
SDI-16,090	6.25	No	RS	No	Yes	Prehistoric	-	-	-	-
SDI-21,573	6.26	Yes	RS	No	Yes	Prehistoric	12	-	-	-
SDI-21,574	6.27	Yes	FP	No	Yes	Prehistoric	1,277	-	-	1
SDI-21,575	6.28	Yes	SC	Yes	No	Prehistoric	11,227	4,616	70	246
SDI-21,576	6.29	Yes	FP	No	No	Prehistoric	1,910	-	-	6
SDI-21,577	6.30	Yes	FP	No	No	Prehistoric	2.2	-	-	-
SDI-21,595	6.31	Yes	FP	No	Yes	Prehistoric	1,254	-	-	5
SDI-21,596	6.32	Yes	AS	Yes	No	Prehistoric	50	79.5	70	76
SDI-21,607	6.33	Yes	FP	No	Yes	Prehistoric	924	-	-	4

Table 7.0-1 (continued)
Summary of Investigations at the Safari Highlands Ranch Sites

Site Designation	Report Section	Tested	Site Type	Significant	Potential Direct Impacts	Cultures Represented	Surface Area (m ²)	Subsurface Area (m ²)	Max. Subsurface Depth (cm)	Total Artifacts Collected
SDI-21,597	6.34	Yes	FP	No	Yes	Prehistoric	5.5	-	-	-
SDI-21,598	6.35	Yes	FP	No	Yes	Prehistoric	432	-	-	-
SDI-21,599	6.36	Yes	RS	No	No	Prehistoric	25	-	-	3
SDI-21,600	6.37	Yes	FP	No	Yes	Prehistoric	434	-	-	-
SDI-21,601	6.38	Yes	RS	No	Yes	Prehistoric	313	-	-	-
SDI-21,602	6.39	Yes	FP	No	No	Prehistoric	63	-	-	-
SDI-21,603	6.40	Yes	FP	No	Yes (partial)	Prehistoric	7,888	-	-	1
SDI-21,604	6.41	No	Rock Wall	No	Yes	Historic	10.7	-	-	-
SDI-21,605	6.42	No	Rock Wall	No	Yes	Historic	32.3	-	-	-
SDI-21,606	6.43	Yes	FP	No	No	Prehistoric	26	-	-	-
P-37-017032	6.44	Yes	Foundation	No	No	Historic	2,100	1,911	30	79
P-37-017031	6.45	Yes	Foundation	No	Yes (partial)	Historic	1548.5	-	-	-
P-37-017047	6.46	Yes	FP/Historic Rock Wall	No	No	Historic/Prehistoric	2,305	-	-	-
P-37-017044	6.47	Yes	Rock Wall	No	Yes (partial)	Historic	470.5	-	-	-
P-37-017051	6.48	Yes	Foundation	No	Yes	Prehistoric/Historic	9.8	21.9	30	15
Temp-P	6.49	Yes	FP	No	No	Prehistoric	197	-	-	-

Key:

- SC – Seasonal/Semi-Permanent Camp
- FP – Food Resource Processing/Milling Site
- TC – Temporary Campsite
- RS – Rock Shelter
- AS – Surface Artifact Scatter

Figure 7.0-1
Impact Analysis Map for Cultural Resources
(Deleted for Public Review; Bound Separately)

7.1 Evaluation Procedures

The cultural resources tested within the project were evaluated according to the criteria presented in Section 15064.5 of CEQA. Following the testing program, the sites that were evaluated as significant were consistently noted as having the potential to produce additional information that would be applicable to regionally important research topics. These prehistoric sites contain the wide spectrum of feature types, ceremonial areas, cultural deposits, or elements of material culture that would represent a focused occupation by sizeable populations for many centuries. The majority of sites at the Safari Highlands Ranch Project are primarily food resource extraction sites and temporary camps associated with the Late Prehistoric hunting and gathering subsistence pattern.

Resource importance is assigned to districts, sites, buildings, structures, and objects that possess exceptional value or quality illustrating or interpreting the heritage of San Diego County and the city of Escondido in history, architecture, archaeology, engineering, and culture. A number of criteria are used in demonstrating resource importance. Specifically, criteria outlined in CEQA provide the guidance for making such a determination. The following sections detail the criteria that a resource must meet in order to be determined important.

7.1.1 California Environmental Quality Act (CEQA)

According to CEQA (§15064.5a), the term “historical resource” includes the following:

- 1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (CRHR) (PRC §§5024.1, Title 14 CCR, Section 4850 et seq.).
- 2) A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the PRC or identified as significant in an historical resource survey meeting the requirements of Section 5024.1(g) of the PRC, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- 3) Any object, building, structure, site, area, place, record, or manuscript, which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the CRHR (PRC §§5024.1, Title 14, Section 4852) including the following:
 - a) Is associated with events that have made a significant contribution to the

- broad patterns of California's history and cultural heritage;
 - b) Is associated with the lives of persons important in our past;
 - c) 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; or
 - d) Has yielded, or may be likely to yield, information important in prehistory or history.
- 1) The fact that a resource is not listed in, or determined eligible for listing in, the CRHR, not included in a local register of historical resources (pursuant to Section 5020.1(k) of the PRC), or identified in an historical resources survey (meeting the criteria in Section 5024.1(g) of the PRC) does not preclude a lead agency from determining that the resource may be an historical resource as defined in PRC Section 5020.1(j) or 5024.1.

According to CEQA (§15064.5b), a project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. CEQA defines a substantial adverse change as:

- 1) Substantial adverse change in the significance of an historical resource 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.
- 2) The significance of an historical resource is materially impaired when a project:
- a) 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 CRHR; or
 - b) 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 PRC or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the PRC, 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,
 - c) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its eligibility for inclusion in the CRHR as

determined by a lead agency for purposes of CEQA.

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

1. 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).
2. If a lead agency determines that the archaeological site is an historical resource, it shall refer to the provisions of Section 21084.1 of the PRC, Section 15126.4 of the guidelines, and the limits contained in Section 21083.2 of the PRC do not apply.
3. 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 21803.2 of the PRC, the site shall be treated in accordance with the provisions of Section 21083.2. The time and cost limitations described in PRC 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.
4. If an archaeological resource is neither a unique archaeological nor 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 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) & (e) contain additional provisions regarding human remains. Regarding Native American human remains, paragraph (d) provides:

(d) 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 NAHC as provided in PRC §5097.98. 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 NAHC. 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 requirements of CEQA and the Coastal Act.

7.1.2 City of Escondido Guidelines

The City of Escondido lists nine general policy guidelines in the Escondido General Plan regarding Historic and Cultural Resources (Page VII – 26 to 27). The policies applicable to the Safari Highlands Ranch Project include:

- **Policy 5.2:** “Preserve significant cultural and paleontological resources listed on the national, State, or local registers through: Maintenance or development of appropriate ordinances that protect, enhance, and perpetuate resources; incentive programs; and/or the development of review process.”
- **Policy 5.4:** “Recognize the sensitivity of locally significant cultural resources and the need for more detailed assessments through the environmental review process.”

7.2 Discussion of Significance

7.2.1 Discussion of Individual Site Significance

The testing program conducted at the Safari Highlands Ranch Project produced the information necessary to evaluate the resources according to the criteria presented in Section 7.1. The site evaluations are provided in the individual site reports included in Section 6.0. For all of the sites that have been evaluated as significant, the basis for the finding was the potential of the site to provide information that would contribute to local and regional research issues related to the prehistoric occupation of the project sites (CEQA, Section 15064.5, Criterion D). Four of the sites that were tested were found to qualify as important under the criteria of CEQA, as regionally important, or as eligible for listing on the CRHR or the National Register of Historic Places (NRHP).

The cultural resources within the Safari Highlands Ranch Project were evaluated on the basis of data gathered during the current investigation. Of the 49 sites tested and evaluated, four are recommended as significant based upon CEQA guidelines, and the remaining 45 were evaluated as lacking any further research potential and were not significant. The 49 resources are listed by significance category in Table 7.2–1.

Table 7.2–1

Significance Recommendations for Sites
Found Within the Safari Highlands Ranch Project

Significance Evaluation	Sites	
Significant (CEQA) – Eligible for CRHR	SDI-14,770	SDI-21,575
	SDI-15,072	SDI-21,596
Not Significant – Not Eligible for CRHR	SDI-14,768	SDI-16,090

Significance Evaluation	Sites	
(No Further Research Potential)	SDI-14,769	SDI-21,573
	SDI-14,771	SDI-21,574
	SDI-14,772	SDI-21,576
	SDI-14,773	SDI-21,577
	SDI-14,774	SDI-21,595
	SDI-14,775	SDI-21,597
	SDI-14,776	SDI-21,598
	SDI-14,779	SDI-21,599
	SDI-14,780	SDI-21,600
	SDI-14,943	SDI-21,601
	SDI-15,074	SDI-21,602
	SDI-15,075	SDI-21,603
	SDI-15,078	SDI-21,604
	SDI-15,080	SDI-21,605
	SDI-15,081	SDI-21,606
	SDI-15,082	SDI-21,607
	SDI-15,085	P-37-017031
	SDI-15,088	P-37-017032
	SDI-15,089	P-37-017044
	SDI-15,091	P-37-017047
	SDI-15,201	P-37-017051
	Temp-P	

7.2.2 Discussion of Collective Site Significance

Site significance has been discussed throughout this report on the basis of individual site evaluations using CEQA significance criteria and eligibility Criterion D for the CRHR. Although CEQA does not require consideration of site importance based upon the association of multiple site districts, the discussion of obvious inter-site relationships of prehistoric sites in the Safari Highlands Ranch Project merits discussion.

Utilizing data from the testing program, some conclusions may be drawn from a multiple-site analysis. Geographically, several of the prehistoric sites within the project area are associated with contiguous landforms that are characterized by granite exposures and elevations that form many opportunities for water access and food collecting. The consistency of the land-use pattern at the sites is noteworthy. The natural abundance of food resources coupled with the geographical assimilation of rolling hills, steep canyons, and lithic and food sources found on this foothill setting provides sufficient cause that cultural activity was evident over a wide area, both within and adjacent to the project.

Judging from site characteristics including milling features, artifact density and quantity,

and subsurface deposits, the matrix of a prehistoric resource exploitation pattern can be recognized. Although the sites within the project are not isolated, and are in fact connected geographically, temporally, and culturally to related sites within a short distance of the project, together, these sites form a recognizable collection of processing sites that are associated with major Kumeyaay encampments in San Pasqual Valley.

In a hierarchical analysis of sites, the weight of importance is directly based upon the range of human activities represented by or inferred from the material culture left behind in the archaeological record. Using Binford's model (Binford 1980), it is expected that the sites with the highest number of activities represent the permanent or semi-permanent settlements where all members of a group participated in cultural activities. Conversely, special-use sites, such as a milling station, are used by only a limited selection of the group's population for activities that require a minimal tool kit and have a brief duration of use. The use of a hierarchical approach to site typology for the Safari Highlands Ranch sites is not difficult because most of the sites display recognized artifact types and features. Realistically, milling (food collecting and preparation) activities represent the dominant site use throughout the prehistoric sites recorded on the project. Only one site within the project, SDI-14,770, represents a location where the abundance and variation of the artifacts and features confirms that this site is a long-term seasonal camp or semi-permanent occupation site. This site is also situated in a location that is in close proximity to a water source and trails leading to San Pasqual Valley and Valley Center. This site would have served as the center of the hub of subsistence collecting, with most of the sites within the Safari Highlands Ranch Project to the east of SDI-14,770 being utilized by the occupants of SDI-14,770 to collect food resources.

7.3 Assessment of Effects

In order to assess the effects of the proposed Safari Highlands Ranch Project on cultural resources, a set of assumptions was used for the impact analysis:

- The area of potential development will include all locations that lie within the grading and brushing envelope.
- In areas where development is indicated on the grading plan, impacts to cultural resources are assumed to be direct, particularly those resulting from grading. All direct impacts will result in the disturbance or removal of the resources.
- Cultural resources that are located outside of the grading envelope will be preserved; however, indirect impacts may be a concern for those sites that lie near the developed areas or along graded roads that pass along the major elevations on the north side of the property.

The proposed project will impact 36 of the 49 recorded cultural resources within the Safari Highlands Ranch Project. For the collection of sites that will be impacted, two have been

determined to be significant and eligible for the CRHR and 34 are identified as not CEQA-significant and not eligible for the CRHR. The loss of 34 sites that are determined to not be CRHR-eligible may appear to be an issue; however, the majority of these sites are recorded as isolated milling stations lacking any subsurface component or research potential. See Figure 7.0-1 for site locations, impact areas, and mitigation status.

1. Sites directly impacted by the proposed development of the Safari Highlands Ranch Project:
 - a. Two regionally important sites, recommended as significant based upon CEQA criteria and eligible for the CRHR under Criterion D as Historic Resources, will be directly impacted by the proposed development of the Safari Highlands Ranch Project. One of these sites, SDI-14,770, is characterized as a seasonal occupation site with house ring features and surface artifacts scatters, subsurface deposits, and a range of lithic artifacts that represent a Late Prehistoric subsistence pattern and semi-permanent occupation. The subsurface deposits at SDI-14,770 represent significant research potential and direct impacts to this site would be significant. The second significant site to be impacted is SDI-15,072. Although SDI-15,072 does represent some level of semi-permanent occupation, it does not represent the same level as SDI-14,770; however, the pattern of milling features, artifacts, and subsurface deposits does reflect a food collecting and milling site used repeatedly over a long period of time. The use of SDI-15,072 is directly related to the occupants of SDI-14,770.

Table 7.3-1
 CEQA-Significant and CRHR-Eligible Sites
 Directly Impacted by the Safari Highlands Ranch Project

Directly Impacted	
SDI-14,770	SDI-15,072

- b. Within the limits of grading and brushing for the proposed project, 34 sites will be impacted that have been tested and characterized as not CEQA-significant. These sites have been determined to not meet the criteria for listing on the CRHR. Impacts to these sites will not be significant, as these resources have been completely recorded, all artifacts have been collected, and the sites have no further research potential.

Table 7.3-2
 Not CEQA-Significant and Not CRHR-Eligible Sites
 Directly Impacted by the Safari Highlands Ranch Project

Directly Impacted		
SDI-14,769	SDI-15,075	SDI-21,595
SDI-14,771	SDI-15,078	SDI-21,597
SDI-14,772	SDI-15,080	SDI-21,598
SDI-14,773	SDI-15,081	SDI-21,600
SDI-14,774	SDI-15,085	SDI-21,601
SDI-14,775	SDI-15,088	SDI-21,603
SDI-14,776	SDI-15,089	SDI-21,604
SDI-14,779	SDI-15,091	SDI-21,605
SDI-14,780	SDI-16,090	SDI-21,607
SDI-14,943	SDI-21,573	P-37-017031
SDI-15,074	SDI-21,574	P-37-017044
P-37-017051		

2. Sites not impacted by the proposed development of Safari Highlands Ranch Project:

- a. Two sites, SDI-21,575 and SDI-21,596, were identified as CEQA-significant and eligible for the CRHR as Historical Resources and will not be impacted by the project.

Table 7.3-3
 CEQA-Significant and CRHR-Eligible Sites
 That Will Not Be Impacted by the Safari Highlands Ranch Project

Not Impacted	
SDI-21,575	SDI-21,596

- b. The following 11 sites have been tested and determined to be not CEQA-significant and not eligible for the CRHR. These sites have no further research potential or sensitive features and will not be impacted according to the project design.

Table 7.3–4
 Not CEQA-Significant and Not CRHR-Eligible Sites
 That Will Not Be Impacted by the Safari Highlands Ranch Project

Not Impacted	
SDI-14,768	SDI-21,599
SDI-15,082	SDI-21,602
SDI-15,201	SDI-21,606
SDI-21,576	P-37-017032
SDI-21,577	P-37-017047
Temp-P	

Summary of Impact Significance

The area within the development at the Safari Highlands Ranch Project will directly impact 36 archaeological sites, either completely or partially. Two of these sites were evaluated as significant based upon CEQA significance criteria and eligible for the CRHR as Historic Resources; impacts to these two sites are considered significant because development will result in adverse changes to the two CRHR-eligible sites. Impacts to the remaining 34 sites will not be significant, as these sites have no further research potential. A total of 13 sites are outside of the proposed construction zone and will not be directly impacted by the development. Furthermore, for those resources located outside of the development envelope, whether evaluated as significant or not, no indirect impacts are likely, as these will all be protected in open space. Impacts and significance recommendations are summarized in Table 7.3–5.

Table 7.3–5
 Summary of Impacts and Significance Recommendations

Directly Impacted	
Number of CRHR-Eligible Sites Directly Impacted	2
Number of Not CEQA-Significant Sites Directly Impacted	34
Total Number of Sites Directly Impacted	36
No Impacts	
Number of CRHR-Eligible Sites Not Impacted	2
Number of Not CEQA-Significant Sites Not Impacted	11
Total Number of Sites Not Impacted	13
Total Number of Sites	49

Off-Site Impacts

Off-site improvements will not impact any resources beyond the boundaries of the Safari Highlands Ranch ownership. Site P-37-014922 is located adjacent to the Zoo Road access route, but will not be affected by the off-site improvement element of the design unless the improvement corridors change.

7.4 Cumulative Impacts

A cumulative impact, in terms of cultural resources, refers to the mounting aggregate effect upon cultural resources due to modern or recent historic land use, such as residential development, agriculture, and natural processes such as erosion, that result from acts of man. The key to assessing cumulative impacts to archaeological sites is the recognition that these resources are not renewable nor can they be replaced. The importance and significance of cultural resources comes from their association with our heritage, as well as the research value and the information that they contain. Hence, the issue that must be explored in a cumulative impact analysis is the aggregate loss of information, as well as the loss of recognized cultural landmarks and vestiges of our community's cultural history. The CEQA definition of a cumulative impact from the Office of Planning and Research, Section 15355 is:

Cumulative impacts refer to two or more individual effects, which when analyzed together, are considerable or which compound or increase other environmental impacts. Furthermore:

- (a) The individual effect may be changes resulting from a single project or a number of separate projects.
- (b) The cumulative impact from several projects is the change in the environment, which results from the incremental impacts of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

A cumulative impact analysis typically considers the development of the proposed project in conjunction with other modern development or land uses, such as farming, in the vicinity, as well as the effects of natural events on cultural resources. The potential cumulative effect of modern land use is the loss of cultural resources, which would collectively contribute to the loss of San Diego prehistory. However, project-specific mitigation can be implemented to reduce the effect of development by ensuring the scientific recovery, study, and curation of important cultural resources.

The following subsection discusses the cumulative impacts for the prehistoric cultural

resources located within the Safari Highlands Ranch Project. The project records searches were used as a guide for making site comparisons and defining site types and resource study areas. In addition, updated information (2015) obtained through the records information found at the SCIC was also used for the cumulative impact assessment. The current status of archaeological sites outside of the project boundaries was verified through visual inspection of the current aerial imagery. Assumptions of site status were based upon aerial maps showing developed lands and site record information.

7.4.1 Resource Study Area

The Safari Highlands Ranch Project is located in an area of San Diego County characterized as inland foothills and valleys situated below 3,000 feet AMSL, where the local biological habitat has tremendous diversity and water is seasonally abundant. More specifically, it is located near the San Dieguito River and various tributaries of that watershed that supported large populations of Native Americans over the past 10,000 years. In prehistoric times, the vegetation of San Pasqual Valley and associated valleys, canyons, and elevations consisted of coastal sage scrub, chaparral, oak woodland, and stream habitats that supported an immense diversity of plants and animals. Archaeological evidence from prehistoric sites along the watershed of the San Dieguito River has been radiocarbon dated to the early and middle Holocene, beginning approximately 9,500 to 9,000 years YBP (Smith et al. 2011 [the 4S Ranch Project]). Based upon the San Dieguito Watershed Study presented in the 4S Ranch data recovery program, the entire watershed encompasses 350 square miles from the ocean to the mountains. Within this watershed, the San Dieguito Watershed Study included records for 1,255 prehistoric sites. These sites represented the full spectrum of site types for the Archaic and Late Prehistoric populations in this area, including camps, task sites, lithic scatters, shell scatters, bedrock milling sites, quarries, shelters, and ceremonial sites.

The information obtained from the San Dieguito Watershed Study suggests a certain degree of consistency and continuity in the use of the watershed throughout prehistory (see also Byrd and Serr 1993; Grenda 1997; Moriarty 1966; Raven-Jennings and Smith 1999a; True 1966, 1970; True et al. 1974). Settlement throughout the Holocene, or for the past 9,500 years, was primarily focused upon the placement of camps and task sites (excluding shell scatters) in the inland region, in areas from which the coast is moderately accessible, near lithic sources, and in close proximity to the confluence of two or more drainages. The largest quantity of camps and task sites are located between 300 and 700 feet AMSL, indicating that these elevations were important throughout prehistory. Camps are most commonly found on mesas, terraces, and in valleys. Interestingly, there is no data that would suggest that the watershed was utilized prior to 9,500 YBP.

Generally, the data obtained from the San Dieguito Watershed Study shows that there was a considerable degree of uniformity in prehistoric settlement, in that sites were placed in areas that had easy access to lithic sources and moderate access to the coast. Within the San

Dieguito watershed, there are differences in the distribution of sites in relationship to various environmental variables that indicate that there was change in the settlement system over time. Late Prehistoric camps, lithic scatters, and bedrock milling sites show secondary peaks in areas from which the coast and lithic sources are moderately inaccessible. These results suggest that other variables influence site placement, especially during the Late Prehistoric Period. Other resources, such as plants (nuts and seeds), other lithic sources (quartz), and/or reliable sources of fresh water, rather than close access to the coast or lithic sources, likely influenced the position of these sites. The data strongly supports that during the Late Prehistoric Period, direct access to lithic material was a less important variable than during the Archaic Period.

All Archaic sites are located in the coastal and inland regions below 1,400 feet AMSL; furthermore, there are no Archaic camps between 800 and 1,300 feet AMSL and all Archaic task sites are located below 700 feet AMSL. The greatest elevations of Archaic use are between 400 and 700 feet AMSL and the majority of Archaic camps are found between 400 and 700 feet AMSL. No Archaic sites are recorded within the Safari Highlands Ranch property.

The entire San Dieguito River watershed, from the coast to the mountains and from sea level to 3,000 feet AMSL, was being utilized by the Late Prehistoric Period (post-1,300 YBP). There are Late Prehistoric camps, lithic scatters, shell scatters, ceremonial sites, and bedrock milling sites in all three regions; storage/shelter sites are only found in the inland and mountain regions. Nonetheless, the emphasis for Late Prehistoric settlement is focused upon the inland region. Late Prehistoric camps were most common between 400 and 600 feet AMSL, and again between 1,300 and 1,400 feet AMSL. Bedrock milling and lithic scatters are most common between 1,300 and 1,500 feet AMSL, while lithic scatters and shell scatters are also abundant between 300 and 400 feet AMSL. Interestingly, the greatest quantity of Late Prehistoric task sites occur 100 feet below, and in some cases, 100 feet above, the greatest quantity of Late Prehistoric camp elevations. In summary, the elevations of greatest Late Prehistoric use are between 300 and 600 feet AMSL and between 1,300 and 1,500 feet AMSL. There is only one recorded Late Prehistoric camp at 2,500 feet AMSL; however, there are several storage/shelter sites between 2,500 and 3,000 feet AMSL. These findings are, again, consistent with the 4S Ranch data (Smith et al. 2011), which shows that there was an increase in the use of higher elevations through time.

Late Prehistoric camps situated between 1,300 and 1,400 feet AMSL are medium-large (10,000 to 19,999 square meters) to large (over 20,000 square meters) in size, whereas those positioned between 400 and 600 feet AMSL range from small (less than 1,999 square meters) to large in size. The presence of small Late Prehistoric camps in the study area is contrary to that of Byrd and Reddy (1999) who found that there was an increase in camp size through time at Camp Pendleton. The reasons for this may possibly be explained by the fact that Byrd and Reddy's (1999) study examined only the coastal margin and a limited portion of the inland area (1.5 to 4.0 kilometers from the coast), and that their study did not encompass a major river drainage of San Diego County. Furthermore, Late Prehistoric settlement in the extreme northern part of San

Diego County may have been different; especially given that ethnographically, this is the area of the Luiseño, while the Kumeyaay occupied the San Dieguito watershed. There may have been cultural differences in settlement patterns.

Late Prehistoric task sites are generally small in size. Similar to the coastal Camp Pendleton study by Byrd and Reddy (1999), there appears to be an increase in the quantity of small task sites during the late Holocene. The increase in the quantity and variety of small task sites is primarily represented by the addition of bedrock milling sites. Byrd and Reddy (1999) have suggested that the increase in specialized small sites signifies a trend for the targeted collection of specific resources, which created a greater range of site types and ecological niches being utilized. The greater distribution, in terms of elevation and region, of Late Prehistoric camps and task sites throughout the watershed indicates that during the Late Prehistoric Period, a larger area and greater number of habitats was being exploited.

Late Prehistoric camps are located on a variety of landforms, including mesas, terraces, slopes, valleys, saddles, knolls, and crests, in comparison to Early Archaic camps, which are only found on three landform types. More Late Prehistoric camps and task sites are near springs than during the Archaic Period, especially when compared to the Early Archaic, while the position of camps near the confluence of two or more drainages continues to be an important variable for site placement. The position of camps near springs is similar to that observed by Graham (1981) in his analysis of the Laguna Mountain archaeological sites. Late Prehistoric camps also show greater variability in terms of their placement near intermittent and permanent streams over Archaic camps. Late Prehistoric camps and task sites are closer to permanent streams, which include the Santa Ysabel, Santa Maria, and Temescal creeks, than they were during the Archaic Period.

Furthermore, by the Late Prehistoric Period, the region north of the San Dieguito River became much more utilized than during the previous Archaic Period, given the significant increase in the quantity of task sites, as well as a few camps that are positioned north of the San Dieguito River in areas that correspond to the area north of San Bernardo Mountain, San Bernardo Valley, and San Pasqual Valley. The data would seem to suggest that Late Prehistoric groups in the San Dieguito study area were organized into several different rancherías/villages in the three regions: coast, inland, and mountains. These concentrations of Late Prehistoric sites are generally located in Lusardi Creek/La Jolla Valley, Rancho Bernardo, the foothills north of Poway, San Bernardo Valley, San Pasqual Valley, Santa Maria Valley, and Ballena Valley. These concentrations of Late Prehistoric sites correspond to the ethnographic villages of Hapai (Lusardi Creek/La Jolla Valley), Piedras Pintadas (Rancho Bernardo), Sinyau-Pichkara (north of Green Valley), Ahmukatkatl (San Pasqual Valley), Pa'mu (Santa Maria Valley), and Epegam (Ballena Valley). Interestingly, only one camp was identified in the vicinity of the San Dieguito village during the study, which may suggest that activities at this village were limited. Furthermore, the concentrations of Late Prehistoric sites in Green Valley and San Bernardo Valley do not have ethnographic names, which may indicate that these areas were abandoned by

the time of Euro-American contact. The large concentrations of Late Prehistoric sites indicate that logistical groups were sent from these villages to procure resources, resulting in numerous task sites and small camps that radiated out from the main camp area.

The San Dieguito Watershed Study documented that prior to 5,500 years YBP, subsistence became focused upon coastal resources, followed by inland resources, and camps were located near lithic sources rock on mesas and in valleys. By approximately 5,500 YBP, there is a significant change in the settlement and subsistence regime of prehistoric groups inhabiting the San Dieguito River watershed. After 5,500 YBP and until 1,300 YBP, the exploitation of terrestrial resources intensified to the near exclusion of coastal resources. Late Archaic sites were located on a greater variety of landforms and the use of higher elevations became evident. The accessibility of seasonal fresh water sources, such as springs and the confluence of streams, became more important for site placement. The Late Prehistoric Period, from approximately 1,300 to 200 YBP, witnessed yet another change in the settlement system as other variables increased in significance, including multiple fresh water sources and vegetation/plants, although this was unable to be measured in the San Dieguito Watershed Study (Smith et al. 2011) given the expansion of sites into the eastern inland and mountain regions. All elevations in the drainage were being utilized by the Late Prehistoric Period, and it is likely that access to food sources became an important variable for site placement. Late Prehistoric sites were positioned on a number of different landform types, showing an increase in small task sites. These findings are generally consistent with those observed by Smith (1986) and Gallegos (1992). While the settlement study data shows that water was an important variable for camp placement throughout the Holocene, there does appear to be an increase in the use of springs and confluences, and especially permanent Rank 4 streams, during the Late Prehistoric Period. The increase in the use of water sources, which were likely seasonal in nature (*e.g.*, springs), through time may offer evidence that by approximately 5,500 YBP, the settlement strategy was logistical, with small groups being sent to procure seasonal abundant resources to be brought back to the residential base.

These findings are consistent with a general pattern of resource intensification that occurred during the late Holocene and that has been noted by other researchers (Basgall 1987; Byrd and Raab 2002; Byrd and Reddy 1999; Raab 1996; Wohlgemuth 1996). By 5,500 YBP, the increase not only in site type, but also in the quantity and variety of regions, elevations, landform types, and water types that were utilized by prehistoric groups suggests an intensification of resource use; this intensification accelerated by 1,300 YBP. Interrelated factors that may have resulted in resource intensification include decreased territory, population increase, and/or a restricted subsistence base that may have been caused by migrating populations (Altschul and Grenda 2002; Moratto 1984) and drought (Jones et al. 2004; Raab and Larson 1997). Clearly, the current settlement study of a large portion of the San Dieguito River watershed has offered valuable insight into settlement patterns of prehistoric people of San Diego County and has demonstrated that the native people were resilient and resourceful in an

ever-changing environment.

7.4.2 Cumulative Impact Analysis

Within a one-mile radius of the proposed Safari Highlands Ranch Project, development impacts have been minimal, focusing mainly in the area of the San Diego Zoo Safari Park and the Monte Vista development west of the Safari Highlands Ranch Project. Otherwise, over 90 percent of the area to the north, east, and south of the project is either undeveloped or is in agricultural use. Several rural residential properties exist to the west of the Safari Highlands Ranch Project, representing land use that typically does not include mass grading, and thus, does not commonly result in the removal of cultural resources. Generally speaking, the trend of recent development on the east side of the city of Escondido reflects the eastward expansion of planned residential communities and the concomitant need for improved and additional infrastructure on the eastern edge of the city.

There have been 77 archaeological sites recorded within a one-mile radius of the Safari Highlands Ranch Project, including 34 within the Safari Highlands Ranch Project. The primary prehistoric sites identified in, or near, the project area, include surface lithic scatters, temporary camps/artifact scatters, quarries, bedrock milling, and habitation sites. The other sites (quarries, temporary camps/artifact scatters, and habitation locales) are located along the canyon and drainages that feed into the San Dieguito watershed. Of the total 77 recorded sites, 62 are listed as Late Prehistoric resource processing sites (mainly milling sites) and 15 are listed as historic sites.

For the one-mile radius around the Safari Highlands Ranch Project, approximately 35 to 40 percent of the land has been previously surveyed by archaeologists, based upon the records search data. The current status of most (N=30; approximately 70 percent) of the 43 archaeological sites outside of the Safari Highlands Ranch property is relatively certain based upon aerial imagery. Sites have been impacted by grading for roads, agriculture, and development. Eight sites, including artifact scatters/temporary camps, surficial artifact scatters, and isolates, have likely been impacted by development in a one-mile radius surrounding the Safari Highlands Ranch property.

Based upon the analysis of the area surrounding Safari Highlands Ranch, it is clear that only a limited number of sites have been destroyed by development. Given the small quantity of prehistoric resources impacted by development in the general vicinity of Safari Highlands Ranch, the cumulative impacts of development are minimal. The development of the proposed Safari Highlands Ranch Project will impact only two significant cultural resources, representing a small cumulative impact to important prehistoric cultural resources that contribute to the diversity and temporal range of prehistoric sites in the San Pasqual Valley region. Furthermore, these sites are positioned in the upper drainages of the San Dieguito River watershed, and as such, are ideally suited for answering important questions regarding subsistence and settlement, chronology, technology, and trade.

Mitigation can be implemented to reduce the cumulative impact of the proposed development by ensuring the scientific recovery, study, documentation, and curation of these significant sites to be impacted. Important information about prehistory will not be lost through well planned and executed mitigation that documents and gathers all data from these irreplaceable and nonrenewable resources. Consequently, since the actions of the proposed development can be mitigated through data recovery, curation, and reporting, the cumulative impact of the proposed project will be reduced to a level below significant.

8.0 GENERAL MITIGATION MEASURES

The proposed development of the Safari Highlands Ranch Project will impact cultural resources. As noted in the impact analysis section, it is assumed that the sites within the limits of grading and brushing will be subjected to impacts as a result of project approval. For the purpose of determining appropriate impact mitigation measures, the impacts to cultural resources were considered on a project-wide basis, as discussed in Section 7.0. Any phasing of the project will not affect the net result of the eventual direct and indirect impacts to the cultural resources. Where significant archaeological sites will be impacted, measures shall be required to mitigate the potential impacts to a level below significant. In general, the mitigation of impacts to important archaeological sites may be achieved through avoidance (preservation) or data recovery. Because cultural resources are finite, avoidance and preservation are preferred mitigation measures. Avoidance would require that cultural resources be set aside and preserved in open space easements. The sizes of the easements would be based upon the boundaries of the sites, unless the preserved areas are large spaces intended to be within biological open space areas.

Where development will impact significant sites and avoidance is not feasible, mitigation of potential impacts may be achieved through data recovery. With few exceptions, the significance of the important sites was rooted in the information potential represented by the subsurface deposits of cultural materials. Therefore, the research potential of the sites may be realized through the accumulation of data through excavations and the analysis of artifacts and provenience information.

The necessary treatment of cultural resources within the Safari Highlands Ranch Project is discussed in general terms below and in greater detail in Section 9.0, which lists the mitigation measures for the significant cultural resources to be impacted. In addition to site-specific mitigation measures, the approval of the project must include a Mitigation Monitoring and Reporting Program (MMRP) to ensure that resources that were not previously recorded, but could be identified during the grading of the property, will be properly recorded and evaluated, and if found to be significant, will be subjected to additional mitigation measures.

8.1 Recommendations

In accordance with Section 15064.5 of CEQA, the sites that will be adversely affected and are evaluated as eligible for the CRHR, and which are identified as Historical Resources, will require mitigation measures in the form of avoidance (preservation) and/or data recovery programs to reduce the significance of the impacts. Preservation is the preferred method to reduce adverse impacts to significant resources. In order to reduce impacts to a level below significant, those areas of the project that represent direct impacts could be redesigned to avoid the significant sites; data recovery programs will be necessary at those sites that are important

and will be impacted, but cannot be preserved. Where preservation is not feasible and data recovery is selected, the data recovery programs must include adequate subsurface samples of the significant deposits to meet the requirements for data recovery. The general mitigation protocol is provided in Section 8.2, while the project's mitigation procedures are provided in Section 8.3, and site-specific mitigation measures are provided in Section 9.0.

Proposed mitigation measures for the Safari Highlands Ranch Project include recommendations for preservation and data recovery, as discussed below:

1. All sites, regardless of significance status, that are located outside of the development area will be placed in protective open space. The sites may be included in general project-wide open space preserves, in which case, site-specific easements would not be necessary. For most of the sites that will be preserved outside of the development envelope, easements will be incorporated within large biological or open space areas. The open space designation must include language that will prohibit any type of surface modification to the sites or intrusions into the site by grading, trenching, or other development-related improvements. For any sites located within open space, a park area, or the preserve, specific requirements for individual sites may be necessary to ensure that the sites are not impacted by maintenance or landscaping. During grading or brushing, temporary fences may be required by the monitoring archaeologist to provide a physical barrier between the grading machinery and adjacent significant cultural resources that are designated for preservation or eventual data recovery. Measures to protect resources may be needed to avoid impacts.
2. Under CEQA guidelines, the mitigation of adverse impacts may be achieved through the implementation of a Data Recovery Plan. Sites for which this type of mitigation program would be appropriate are those deemed to be significant for their research potential. Sites SDI-14,770 and SDI-15,072 which have been identified as significant Historical Resources and eligible for listing on the CRHR will be impacted by the project and were not able to be preserved; these sites are included in the Data Recovery Program outlined in Section 9.0.
3. Because of the large number of cultural resources within the project and the fact that past uses or dense ground cover may have masked additional sites, all brushing and grading within the Safari Highlands Ranch Project shall be monitored. The monitoring of the brushing and grading shall be conducted by one or more archaeologist(s), as dictated by the size of the grading operation. All utility excavations, road grading, or brush removal must be coordinated with the archaeological monitor. Any known resources that are graded must be intensively monitored during grading to ensure that any important features, isolates, or deposits are either recorded and collected, or excavated. Should any resources be encountered

during the monitoring of the brushing and grading that were not previously recorded, the action will be temporarily halted or redirected to another area while the nature of the discovery is evaluated. Any resources that may be encountered will require testing to determine their significance. If the testing demonstrates that a resource is significant, then a data recovery program will be necessary.

8.2 Project-Specific Mitigation Measures

The general categories of measures to mitigate potential impacts to cultural resources within the Safari Highlands Ranch Project are provided below:

A. Mitigation of Direct Impacts to Sites Determined as CEQA-Significant and CRHR Historical Resources: Within the project, sites SDI-14,770 and SDI-15,072 have been tested and evaluated as eligible for the CRHR under Criterion D as Historical Resources. Both of these sites are located within the proposed construction zone and direct impacts cannot be avoided. For SDI-14,770, portions of the site may not be graded and those portions should be preserved in a dedicated open space easement. The mitigation measures recommended for the two significant sites are discussed in Section 9.0.

Table 8.2-1

Recommended Mitigation for CEQA-Significant and CRHR-Eligible Sites Directly Impacted by the Safari Highlands Ranch Project

Site	Recommended Mitigation
SDI-14,770	Data Recovery/Partial Preservation
SDI-15,072	Data Recovery

B. Mitigation of Direct Impacts to Sites Identified as Not CEQA-Significant: The following sites have been evaluated as not CEQA-significant. No mitigation measures are recommended for these sites.

Table 8.2-2

Recommended Mitigation for Sites Determined as Not CEQA-Significant and Directly Impacted by the Safari Highlands Ranch Project

Sites	Recommended Mitigation
SDI-14,769 SDI-15,091	None

Sites		Recommended Mitigation
SDI-14,771	SDI-16,090	
SDI-14,772	SDI-15,089	
SDI-14,773	SDI-21,573	
SDI-14,774	SDI-21,574	
SDI-14,775	SDI-21,595	
SDI-14,776	SDI-21,597	
SDI-14,779	SDI-21,598	
SDI-14,780	SDI-21,600	
SDI-14,943	SDI-21,601	
SDI-15,074	SDI-21,603	
SDI-15,075	SDI-21,604	
SDI-15,078	SDI-21,605	
SDI-15,080	SDI-21,607	
SDI-15,081	P-37-017031	
SDI-15,085	P-37-017044	
SDI-15,088	P-37-017051	

C. Measures Needed for Sites Determined as CEQA-Significant and CRHR-Eligible That Will Not Be Impacted: Two Historical Resources within Safari Highlands Ranch will not be directly impacted by the development. For these sites, preservation will be facilitated by the enforcement of open space easements for the sites that preclude any disturbance in the future.

Table 8.2-3

Recommended Mitigation for CEQA-Significant Sites (CRHR-Eligible Historical Resources) Not Impacted by the Safari Highlands Ranch Project

Site	Recommended Mitigation
SDI-21,575	Preservation – Open Space Easement
SDI-21,596	Preservation – Open Space Easement

D. Measures Needed for Sites Determined Not CEQA-Significant That Will Not Be Impacted: Mitigation measures will not be required at the 11 sites determined as not CEQA-significant that are located outside of the area of development and which will not be affected by direct or indirect impacts. These sites will fall within general biological open space easements, and will therefore be protected from any future impacts.

Table 8.2-4
 Recommended Mitigation for Sites Determined As Not
 CEQA-Significant and Not Impacted by the Safari Highlands Ranch Project

Site	Recommended Mitigation
SDI-14,768	Open Space Easement
SDI-15,082	Indirect Mitigation Required
SDI-15,201	Open Space Easement
SDI-21,576	Open Space Easement
SDI-21,577	Open Space Easement
SDI-21,599	Open Space Easement
SDI-21,602	Open Space Easement
SDI-21,606	Open Space Easement
P-37-017047	Open Space Easement
P-37-017032	Open Space Easement
Temp-P	Avoidance

8.3 Mitigation Monitoring and Reporting Program

Safari Highlands Ranch contains 49 recorded cultural resources. Of this total, 36 sites (two CEQA-significant and 34 not significant) will be directly impacted and 13 sites (two CEQA-significant and 11 not significant) sites will not be directly impacted. The following **mitigation measures** are recommended to reduce significant impacts to recorded archaeological resources, unrecorded subsurface archaeological resources, and unrecorded human remains within the project.

- MM CUL-1 Prior to issuance of land development permits, including clearing or grubbing, and grading permits, the applicant shall provide written confirmation and incorporate into grading plans, to the satisfaction of the environmental review coordinator, that a principal investigator (PI) meeting the criteria listed in the Secretary of the Interior guidelines (36 CFR 61) has been retained in an oversight capacity of previously undisturbed soil. If these cutting activities occur in more than one location, multiple monitors shall be provided to monitor these areas, as determined necessary by the PI.

- MM CUL-2 During the initial grading of previously undisturbed soils within the project, unrecorded prehistoric and historic resources may be encountered. In the event that the archaeological monitor discovers a previously unrecorded site, the

monitor shall secure the discovery site from further impacts by delineating the site with staking and flagging, and by diverting grading equipment away from the archaeological site. Following notification to the City, the archaeological monitor shall conduct investigations as necessary to determine if the discovery is significant under the criteria listed in CEQA and the environmental guidelines of the City. Any resources discovered during grading that are determined to be significant shall be subjected to additional mitigation measures, including data recovery excavations, in order to achieve mitigation of impacts. If the discovery is determined to be not significant, grading operations may resume and the archaeological monitor shall summarize the findings in a letter report submitted to the City following the completion of mass grading activities. The letter report shall describe the results of the on-site archaeological monitoring, each archaeological site observed, the scope of testing conducted, results of the laboratory analysis (if applicable), and conclusions. The letter report shall be completed to the satisfaction of the City of Escondido's environmental review coordinator prior to the release of grading bonds. Any artifacts recovered during the evaluation of resources shall be curated at a facility approved by the City.

MM CUL-3 For the cultural prehistoric/historic resources that are determined to be significant, alternate means of achieving mitigation shall be pursued. In general, these forms of mitigation include:

- A. Site avoidance by preservation of archaeological sites in a natural state in open space, or in specific open space easements;
- B. Site avoidance by preservation through capping the site and placing landscaping on top of the fill;
- C. Data recovery through implementation of an excavation and analysis program; or
- D. A combination of one or more of the above measures.

MM CUL-4 For those sites that are found to contain significant resources and for which avoidance and preservation is not feasible or appropriate, the applicant shall prepare a Data Recovery Plan. The plan will, at a minimum, include the following:

- A. A statement of why data recovery is appropriate as a mitigation measure;
- B. A research plan that explicitly provides the research questions that can reasonably be expected to be addressed by excavation and analysis of the

- site;
- C. A statement of the types and kinds of data that can reasonably be expected to exist at the site and how these data will be used to answer important research questions;
- D. A step-by-step discussion of field and laboratory methods to be employed; and
- E. Provisions for curation and storage of the artifacts, notes, and photographs.

Grading operations within the affected area may resume once the site has been fully evaluated and mitigated to the satisfaction of the environmental review coordinator. All significant artifacts collected during the implementation of the Data Recovery Plan shall be curated at a facility approved by the City.

- MM CUL-5 All artifacts collected during the implementation of the Data Recovery Plan, as well as any collected during the cultural resources testing program, shall be permanently curated at a facility approved by the City, such as the San Diego Archaeological Center (SDAC).

The potential to encounter cultural sites during grading is considered high given the density of archaeological sites within the development area. Significant impacts could occur to cultural resources uncovered by clearing and grading, and a monitoring program is necessary to mitigate the potentially adverse impacts associated with the grading of the project. The following section outlines the recommended monitoring program that would dictate the protocol for the monitoring program.

8.4 Cultural Resources MMRP for the Safari Highlands Ranch Project

I. Prior to Permit Issuance

- A. Entitlements Plan Check
 - 1. Prior to issuance of any construction permits, including, but not limited to, the first grading permit, demolition plans/permits and building plans/permits, or a notice to proceed for subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the City of Escondido shall verify that the requirements for archaeological monitoring have been noted on the applicable construction documents.
- B. Letter of Qualification Submitted to the City of Escondido
 - 1. The applicant shall submit a letter of verification to the City of Escondido identifying the PI for the project and the names of all persons involved in the

archaeological monitoring program.

2. The City of Escondido will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project.

II. Prior to the Start of Construction

A. The PI Shall Attend Preconstruction Meetings

1. The qualified archaeologist (PI) shall attend any grading/excavation-related preconstruction meetings to make comments and/or suggestions concerning the archaeological monitoring program with the construction manager and/or grading contractor.
2. Identify Areas to Be Monitored
 - a. Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) to the City of Escondido identifying the areas to be monitored, including the delineation of grading/excavation limits.
 - b. The AME shall be based upon the BFSA cultural resources report for Safari Highlands Ranch (2016).
3. Schedule for Monitoring
 - a. Prior to the start of any work, the PI shall also submit a construction schedule to the City of Escondido indicating when and where monitoring will occur.
 - b. The PI may submit a detailed letter to the City of Escondido prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based upon relevant information such as a review of final construction documents that indicate site conditions such as depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.

III. During Grading

A. Monitor(s) Shall Be Present During Grading/Excavation/Trenching/Brushing

1. The archaeological monitor shall be present full-time during all brushing and soil disturbing activities, including all grading, excavation, and trenching work that could result in impacts to archaeological resources as identified on the AME.
2. The PI may submit a detailed letter to the City of Escondido during construction requesting a modification to the monitoring program when a field condition, such as a modern disturbance or native soils, are encountered that

may reduce the potential for resources to be present.

3. The archaeological monitor shall document field activity in a monitoring log.

B. Discovery Notification Process

1. In the event of a discovery, the archaeological monitor shall direct the contractor to temporarily divert all soil-disturbing activities, including, but not limited to, digging, trenching, excavating, or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources, and immediately notify the City of Escondido, as appropriate.
2. The monitor shall immediately notify the PI (unless the monitor is the PI) of the discovery.
3. The discovery shall not be further disturbed until a determination can be made regarding the significance of the resource.

C. Determination of Significance

1. The PI shall evaluate the significance of the resource. If human remains are involved, follow protocol in Section IV below.
 - a. The PI shall immediately notify the City of Escondido to discuss significance determination before submitting a letter to them indicating whether or not additional mitigation is required.
 - b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) for review and approval by the City of Escondido. The ADRP would outline measures to mitigate further impacts to the significant discovery. Impacts to significant resources must be mitigated before ground-disturbing activities in the area of discovery will be allowed to resume.
 - c. If the resource is not significant, the PI shall submit a letter to the City of Escondido indicating that artifacts will be collected, curated, and documented in the final monitoring report. The letter shall also indicate that no further work is required.

IV. Discovery of Human Remains

If human remains are discovered, work shall halt in that area and no soil shall be exported from that location until a determination can be made regarding the provenance of the human remains. Next, the following procedures as set forth in CEQA Section 15064.5(e), the California Public Resources Code (Sec. 5097.98), and the State Health and Safety Code (Sec. 7050.5) shall be undertaken:

A. Notification

1. The archaeological monitor shall notify the City of Escondido and the PI, if the monitor is not qualified as a PI.

2. The PI shall notify the medical examiner after consultation with the City of Escondido, either in person or via telephone.

B. Isolate Discovery Site

1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the medical examiner in consultation with the PI concerning the provenance of the remains.
2. The medical examiner, in consultation with the PI, will determine the need for a field examination to determine the provenance.
3. If a field examination is not warranted, the medical examiner, with input from the PI, shall determine if the remains are or are most likely to be of Native American origin.

C. If Human Remains **ARE** Determined to Be Native American

1. The medical examiner will notify the NAHC within 24 hours. By law, **ONLY** the medical examiner can make this call.
2. The NAHC will immediately identify the person or persons determined to be the MLD and will provide contact information.
3. The MLD will contact the PI within 24 hours, or sooner if possible, after the medical examiner has completed coordination, to begin the consultation process in accordance with CEQA, Section 15064.5(e), the California Public Resources Code, and the State Health and Safety Code.
4. The MLD will have 48 hours to make recommendations to the property owner or representative for the treatment or disposition with proper dignity of the human remains and associated grave goods.
5. Disposition of Native American human remains will be determined between the MLD and the PI.

D. If Human Remains Are **NOT** Native American

1. The PI shall contact the medical examiner and notify them of the historic era context of the burial.
2. The medical examiner will determine the appropriate course of action with the PI and city staff (PRC 5097.98).
3. If the remains are of historic origin, they shall be appropriately removed. The decision for internment of the human remains shall be made in consultation with the City of Escondido, the applicant/landowner, any known descendant group.

V. **Post Construction**

A. Preparation and Submittal of Monitoring Reports

1. The PI shall submit a monitoring report (even if negative) that describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program to the City of Escondido for review.
 - a. For significant archaeological resources encountered during monitoring, the ADRP shall be included in the draft monitoring report.
 - b. The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms, DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program.
- B. Handling of Artifacts
 1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and catalogued.
 2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area, that faunal material is identified as to species, and that specialty studies are completed, as appropriate.
 3. The cost for curation is the responsibility of the property owner.
- C. Curation of Artifacts: Accession Agreement and Acceptance Verification
 1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing, and/or data recovery for this project are permanently curated with an appropriate institution.
 2. The PI shall include the Acceptance Verification from the curation institution in the final monitoring report.

9.0 DETAILED MITIGATION PLAN AND DATA RECOVERY PROGRAM FOR SAFARI HIGHLANDS RANCH

The proposed development of the Safari Highlands Ranch Project will directly impact all or part of 36 archaeological sites (see Tables 8.2–1 and 8.2–2), two of which have been evaluated as CEQA-significant cultural resources and CRHR-eligible sites (Historical Resources). Both of the significant sites, SDI-14,770 and SDI-15,072, are prehistoric sites. In order to comply with CEQA regulations for the treatment of potentially impacted significant cultural resources, the following mitigation plan was developed. The first preference is always for the protection and preservation of significant sites. The goal of this plan is the preservation of valuable, nonrenewable cultural resources wherever possible and the successful mitigation of direct impacts where preservation is not feasible through data recovery and scientific investigation. The two significant Historical Resources will be impacted by the primary access road into the project. This alignment is extremely constrained by steep slopes, biological habitat, and engineering standards. The sites cannot be avoided by the construction of the road.

Of the 49 sites that were tested and evaluated for significance within the Safari Highlands Ranch Project, four were evaluated as significant based upon CEQA guidelines. The remaining 45 evaluated sites have been determined to lack any further research potential and were evaluated as not CEQA-significant. The sites identified as significant prehistoric resources based upon CEQA criteria represent important prehistoric sites. The responsibility for the proper treatment of these cultural resources is an important element of the environmental planning for the project.

The mitigation program for the Safari Highlands Ranch Project will include the preservation of two significant sites, SDI-21,575 and SDI-21,596, located outside the development zone, and the implementation of a data recovery program at significant sites SDI-14,770 and SDI-15,072, located in the development area. The Data Recovery Program proposed for SDI-14,770 and SDI-15,072 will reduce the impacts to these resources to a level less than significant. For the two CEQA-significant sites that will be directly impacted, mitigation can be achieved through data recovery because the principal aspect of the significance of each of these specific sites is directly related to the research potential and information value represented in the cultural deposits. Successful mitigation of impacts is contingent upon the development and execution of a comprehensive data recovery program. This program will be based upon the following premise:

The significant sites that will be impacted have been identified as significant according to CEQA, which stipulates that their importance lies in the information potential represented in the individual cultural deposits.

If the importance of a site is directly associated with the information potential it retains,

then identifying the range and types of data available at the sites and the regional archaeological objectives that can be furthered with the addition of data from the site will provide the foundation for achieving mitigation through data recovery. As will be demonstrated in subsequent sections, data recovery will suffice to mitigate direct impacts to the specific cultural resources identified as CEQA-significant and CRHR-Eligible, but that were not able to be preserved.

9.1 Data Recovery Program

Following the approval of the development project and prior to the initiation of the Data Recovery Program, the consulting archaeologist shall prepare a detailed research design to guide the scientific investigation of the two significant prehistoric sites. The preparation of the research design should follow the California OHP publication *Guidelines for Archaeological Research Design, Preservation Planning Bulletin No. 5* (1991). The research design for the Data Recovery Program shall focus upon the consideration of the types of data that are potentially available and apply that information to current regional research questions pertaining to the cultures represented at the sites. The research questions posed, therefore, include those that can be more appropriately addressed during data recovery of significant sites to further these research issues. The research design shall incorporate research questions based upon the current state of knowledge in anthropological theory and area-specific research concerns. For the purposes of the research design preparation, the study area includes the southwestern San Diego County region. As a prelude to archaeological data recovery, theoretical research hypotheses must be applied to the proposed Data Recovery Program to ensure that the information recovered will address these important research concerns. The hypotheses should be designed so that they may be tested against the archaeological data recovered from the sites.

The City of Escondido has not adopted a policy that identifies the exact specific level of excavation required to achieve mitigation of impacts by data recovery. In most cases, the level of sampling is dictated by the information potential of the site. Data recovery is commonly discussed in terms of sampling percentages, referring to the percent of the area of the significant subsurface deposit that will be excavated. The general approach for achieving the mitigation of impacts through data recovery will begin with an indexing of the sites. Each site index will include a sufficient sample of the subsurface deposit, ranging from 2.5 to 4.0 percent of each deposit, to effectively stratify the deposits into areas of differing artifact content, densities, and activity areas.

The indexing process will utilize a static grid to cover each site with a sample unit placed in each grid cell. Utilizing a grid will produce a very structured, non-random, and uniform index of the content of each cultural deposit. Within the portion(s) of each site that retains the greatest research potential, an additional two percent of that area will be excavated. For the two sites in the Data Recovery Program for this project, the data recovery volume to be excavated will not exceed a five percent sample of the significant subsurface deposit (area of greater research

potential). This volume of recovery will be sufficient to successfully pursue the research objectives of the research design, as well as to provide other researchers with a large information resource. At the sites considered to retain the greatest research potential, a third level of stratified sampling may be implemented to focus block excavations on areas that demonstrate intense artifact recovery, features, or multicultural depositional patterns.

The excavation of the subsurface deposits will be accomplished with standard one-square-meter test units excavated by hand in 10-centimeter levels. All units will be screened, mapped, measured, and photographed through standard stratigraphic control measures.

For the phases of work at each site, the first phase will be the site indexing and the second phase will be the focused investigation. A third phase, if warranted, would be extremely focused upon high potential elements of any significant site. Each phase has specific goals: the site index is a non-random representative sample of the entire site, while the second and third phases will be a focused, biased, and intuitive study of the area within the deposit that demonstrates the greatest potential through the site index (Phase I) recovery pattern. The use of this type of data recovery has been successfully completed for many projects in southern California, notably in San Diego County at the Rancho San Diego development (Byrd and Serr 1993) and at the 4S Ranch Project, where 26 regionally important sites were subjected to data recovery as mitigation for development-related impacts (Smith et al. 2011).

For consistency, both of the sites will be treated similarly, with an index phase followed by a focused, intuitive phase in the area of greatest importance. Portions of both sites will fall within areas of disturbance, as well as areas to be preserved. Data recovery investigations will be limited to the areas within the development envelope, in addition to a buffer area of 100 feet to allow for construction work to potentially expand beyond the currently delineated work area. The phases of the sampling procedure to be used at the sites included in the Data Recovery Program are:

Phase I: The first phase of excavation at any particular site will typically involve a 2.5 percent sample used to index the site content and document intra-site variation. Test units will be uniformly distributed within each site using a grid system. The presence of multiple rock outcroppings will constitute voids in the sample grid. These areas will be deleted from the calculations of site deposits when the Data Recovery Program is initiated; however, the areas represented by the outcrops cannot be calculated at this time.

Phase II: The second phase of excavation will consist of a 2.0 to 4.0 percent sample of each site area identified as representing the greatest research potential, if any areas of substantially higher research potential are identified by the Phase I sample. The stratification of the site following the Phase I work will typically identify an area of approximately 10 percent of the sample area distinguished as retaining additional research potential. For this sampling phase, the test units would not be randomly placed,

but would be intuitively located at the discretion of the archaeologist.

Phase III: The last phase of excavation will be conducted at any sites that are found to contain particularly important deposits worthy of extended excavation. The sample size of any such area is dependent upon the nature of the deposit and its research potential.

The procedures noted above will be applied to sites SDI-14,770 and SDI-15,072. The actual number of square meters to be excavated in any particular site will depend upon the site size, importance, and research potential. The size of the sample for each of the sites will ultimately be determined by the assessment of the recovery from the sample.

9.2 General Mitigation Procedures for Data Recovery

The sampling levels projected for SDI-14,770 and SDI-15,072 have been provided in Table 9.2–1, based upon the calculated size of the subsurface deposits. The general approach for achieving the mitigation of impacts through data recovery will begin with an indexing of the site. The site index will include a sufficient sample of the subsurface deposit, ranging from 2.5 to 4.0 percent of the deposit in order to effectively stratify it into areas of differing artifact content, densities, and activity areas. The consulting archaeologist shall have the responsibility of determining the final sampling percentage based upon the quality of artifacts and features encountered during data recovery.

Table 9.2–1
Summary of Data Recovery Levels for Significant Sites
SDI-14,770 and SDI-15,072 at the Safari Highlands Ranch Project

Site Designation	Applicable Significance Criteria	Size of Significant Subsurface Deposit (m ²) Impacted	Proposed Test Units Per Phase (m ²)			Total Square Meters Sampled	Proposed Percent of Significant Subsurface Deposit to Be Excavated
			Phase I	Phase II	Phase III		
SDI-14,770	CEQA	5,520	138	40	20	198	3.5
SDI-15,072	CEQA	806	20	10	5	35	4.3

9.2.1 Methodology for the Data Recovery Program

Field Investigations

The Data Recovery Program at SDI-14,770 and SDI-15,072 will focus upon the excavation of one-square-meter test units. If cultural materials are present beyond this depth, the excavation shall continue until one sterile level is exposed. The units will be excavated in controlled, 10-centimeter levels. All soils from test units will be hydro-screened. Hydro-

screening employs flowing water to wash dirt away from cultural artifacts. Various methods for hydro-screening exist, but most employ a temporary raised platform from which archaeologically excavated soil is placed in screens and pressurized water is passed through the screens to wash away dirt, leaving artifacts behind. This method is considered a superior method to dry screening, since it allows for a maximized recovery from the soil matrix. All artifacts recovered during the screening process shall be properly labeled with provenience information in the field, and subsequently subjected to standard laboratory procedures, including cataloging. The excavation of the units will be documented with field notes, illustrations, and photographs.

Any features that are discovered during the archaeological excavations shall be exposed through careful hand excavation. Additional test units may be needed to fully expose the features, which will then be recorded through sketching and photography. Any datable materials found in association with discovered features shall be collected for radiocarbon dating. If obvious datable samples cannot be found at the sites during the data recovery program, then several bulk soil samples may be collected and processed in an attempt to date the deposits.

Laboratory Analysis

All of the cultural materials recovered from the field excavations as part of the Data Recovery Program will be subjected to standard archaeological laboratory analyses. Artifacts may be washed, if necessary, to permit proper identification. The artifacts will be sorted and cataloged, including totals, materials, condition, weight, provenience, and unique artifact identification numbers.

The lithic artifacts recovered from the project will be subjected to an in-house analysis, which will include the recordation of lithic material, critical measurements and weight, and inspection for evidence of use-wear, retouch, patination, or stains. The recovered flakes will be subjected to an analysis of attributes such as size, condition, type, termination, and material.

Non-lithic materials, such as ecofacts (shell, bone, or wood), will be subjected to specialized analyses. The laboratory analysis of the column samples will include flotation procedures to remove seeds and other microfaunal remains from the soil, followed by the screening of the remainder through a one-sixteenth-inch mesh sieve. Flotation may be conducted by PaleoResearch Institute in Golden, Colorado. The recovered materials, such as animal bone, fish bone, seeds, and charred plant remains, will be sorted and subjected to further analysis by the appropriate personnel. Other specialized studies, which will be conducted if the appropriate materials are encountered, include marine shell species identification, faunal analysis, otolith analysis (for seasonality), radiocarbon dating, obsidian sourcing and hydration, and blood residue and phytolith studies. These specialized studies are briefly described below:

- Shell Analysis
 - Marine shell has been documented at sites in the area, including SDI-14,770. Prehistoric people in this area used marine shell as both a food source and for

making shell beads. Marine shell recovered from the sites will be identified by species and weight.

- Faunal Analyses
 - Any faunal material recovered from the excavations will be washed, dried, and identified to the lowest taxonomic category, element, and symmetry. Data recorded will include sex, age, degree of epiphyseal fusion in long bones, and modification to the bones, such as carnivore and rodent gnawing, chopping and cutting marks resulting from butchery practices, burning, and fragment size for each element. Bones will be weighed to the nearest 0.1 gram. Degree of fusion of the long bone epiphyses will allow for the distinction between juvenile and adult individuals. All data will be entered into a database, which will facilitate quantitative and statistical analyses. From the raw data, measures of species composition will be generated using zooarchaeological quantification methods. Due to the small quantity of bone recovered during the testing phase, it is probable that all bone from the site will be analyzed.
- Radiocarbon Dating
 - The radiocarbon dating of features and deposits within both sites will be useful in conjunction with the stratigraphic recovery of cultural materials to establish the chronology of the sites. Therefore, the collection of samples for dating should be based upon the presence of diagnostic artifacts, features, or geological strata delineations. The desired material for radiocarbon dating is that of charcoal, of which small amounts were observed during the testing phase. Should the possibility arise that insufficient charcoal is recovered, bulk soil samples will be collected from features and column samples for dating. Shell samples will be submitted for dating if a sufficient quantity is recovered from the excavations.
- Blood Residue, Pollen, and Phytolith Studies
 - Organic residue on lithic artifacts may be useful in the determination of the animal and plant species represented by the residue. However, the use of such studies is necessarily dependent upon the identification of residues on artifacts; the potential presence of a testable residue must be made prior to wet screening, or the residue samples will be lost. Therefore, lithic precision and ground stone tools found in situ during the excavation shall be bagged separately and returned to the laboratory for possible blood residue, pollen, and phytolith analysis.
- Obsidian Hydration and Sourcing
 - Obsidian was recovered during the testing phase of SDI-14,770 and the potential for additional recovery exists. Several other Late Prehistoric sites in

the near vicinity have produced obsidian. Any recovered obsidian artifacts will be submitted to a specialist to determine the source of the lithic material. Source analysis will be conducted by Dr. Richard E. Hughes, Director of the Geotechnical Research Laboratory in Portola Valley, California. The obsidian shall also be analyzed to produce hydration readings, which may then be used to provide relative dates for the use of the artifacts. Obsidian hydration analysis will be performed by Dr. Thomas Origer, Director of the Obsidian Hydration Laboratory at Sonoma State University in Rohnert Park, California.

- Ceramic Analysis

- The recovery of any prehistoric ceramics will result in the initiation of an analysis of the ceramic artifacts. Typically, ceramics are indicative of the Late Prehistoric Period and were manufactured by nearly all tribes in California after 1,200 YBP. In San Diego County, various groups producing pottery utilized the clays that were immediately available at that location. Analysis of pottery shards can often indicate the origin of the pottery to very specific regions within the county.

- Flotation Sampling

- As part of the special studies element of the program, column samples will be taken to permit microanalysis of midden contents. The columns will measure 10-square centimeters, and will conform to the walls of selected completed test units to the bottom of the deposit. All of the soil from the column will be collected, and not screened in the field. The samples will be returned to the laboratory for analysis. In addition, during hand excavation, special attention will be given to the identification of lithic tools found in situ and their potential for residue analysis. When possible, such tools will be bagged separately, thereby excluding them from the wet-screening process. A sample of the surrounding soil will be collected to serve as a control sample, should the artifact be chosen for blood residue, pollen, and phytolith analyses.

Curation

The prehistoric cultural materials recovered from the Safari Highlands Ranch Project shall be permanently curated at a facility approved by the City of Escondido. The applicant shall provide funding for this action as part of the mitigation program. The requirement for curation of cultural materials shall include all collections that resulted from the survey and testing programs previously completed for this project.

Significance After Mitigation

The successful implementation of a mitigation plan that incorporates preservation or data recovery to reduce the significance of direct and indirect impacts to cultural resources will

achieve the essence of the mitigation program as stipulated by CEQA. For the CRHR-eligible Historical Resources SDI-14,770 and SDI-15,072, the implementation of the mitigation program will reduce impacts to less than significant.

10.0 PERSONNEL

The archaeological survey and evaluation program was directed by Principal Investigator Brian F. Smith. The survey was conducted by Consulting Archaeologist Brian F. Smith with assistance from Field Director Clarence Hoff and field technicians Jason Collins, Kyle Coulter, Stephanie Nelson, Richard Savitch, James Shrieve, Adam Andrus, Mary Lenich, and Michael Tyberg. A Native American representative from Red Tail was present during the field investigations. Brian F. Smith prepared this report and Eric Rodriguez and Kris Reinicke prepared the report graphics. The report was edited and produced by Elena Buckley with assistance from Courtney Accardy.

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APPENDIX I

New Site Record Forms (2015)

(Deleted for Public Review; Bound Separately)

APPENDIX II

Archaeological Records Search Results (2015)

(Deleted for Public Review; Bound Separately)

APPENDIX III

NAHC Sacred Lands File Search Results



Brian F. Smith and Associates, Inc.

Archaeology / Biology / History / Paleontology / Air Quality / Traffic / Acoustics

For: Native American Heritage Commission
915 Capitol Mall, Room 364
Sacramento, California 95814

From: Tracy A Stropes, M.A., RPA
Brian F. Smith and Associates
14010 Poway Rd. Suite A
Poway, CA 92064

Re: Request for a Sacred Lands File records search for the Safari Highlands Project,
San Diego County, California.

I am writing to request a record search of the Sacred Lands File and a list of appropriate Native American contacts for the Safari Highlands Project. The location of this project is within the County of San Diego, California. The project area can be found northeast of the intersection of West Zoo Road and Old Battlefield Road. The project location is in Section 20, 21 and 16 of the USGS 7.5 minute *Escondido*, *San Pasqual*, and *Rodriguez Mountain* California topographic maps (respectively), Townships 12 south, Range 1 west. A copy of the project map, with the project area and one-mile search radius buffer depicted thereon, has been included for your records.

Sincerely,

Tracy A. Stropes, M.A., RPA
Senior Project Archaeologist
Phone: 858-484-0915
Email: tstropes@bfsa-ca.com

Attachments:

USGS 7.5 minute *Escondido*, *San Pasqual*, and *Rodriguez Mountain*, California topographic map with project area delineated.

Sacred Lands File & Native American Contacts List Request
NATIVE AMERICAN HERITAGE COMMISSION
915 Capitol Mall, RM 364 Sacramento, CA 95814 (916) 653-4082
(916) 657-5390 – Fax
nahc@pacbell.net

Information Below is Required for a Sacred Lands File Search

Project: The Safari Highlands Project

County: San Diego

USGS Quadrangle Name: *Escondido, San Pasqual, and Rodriguez Mountain*

Township: 12S Range: 1W Sections 20, 21, and 6

Company/Firm/Agency: Brian F. Smith & Associates

Contact Person: Tracy A. Stropes, RPA

Street Address: 14010 Poway Road, Suite A

City: Poway Zip: 92064

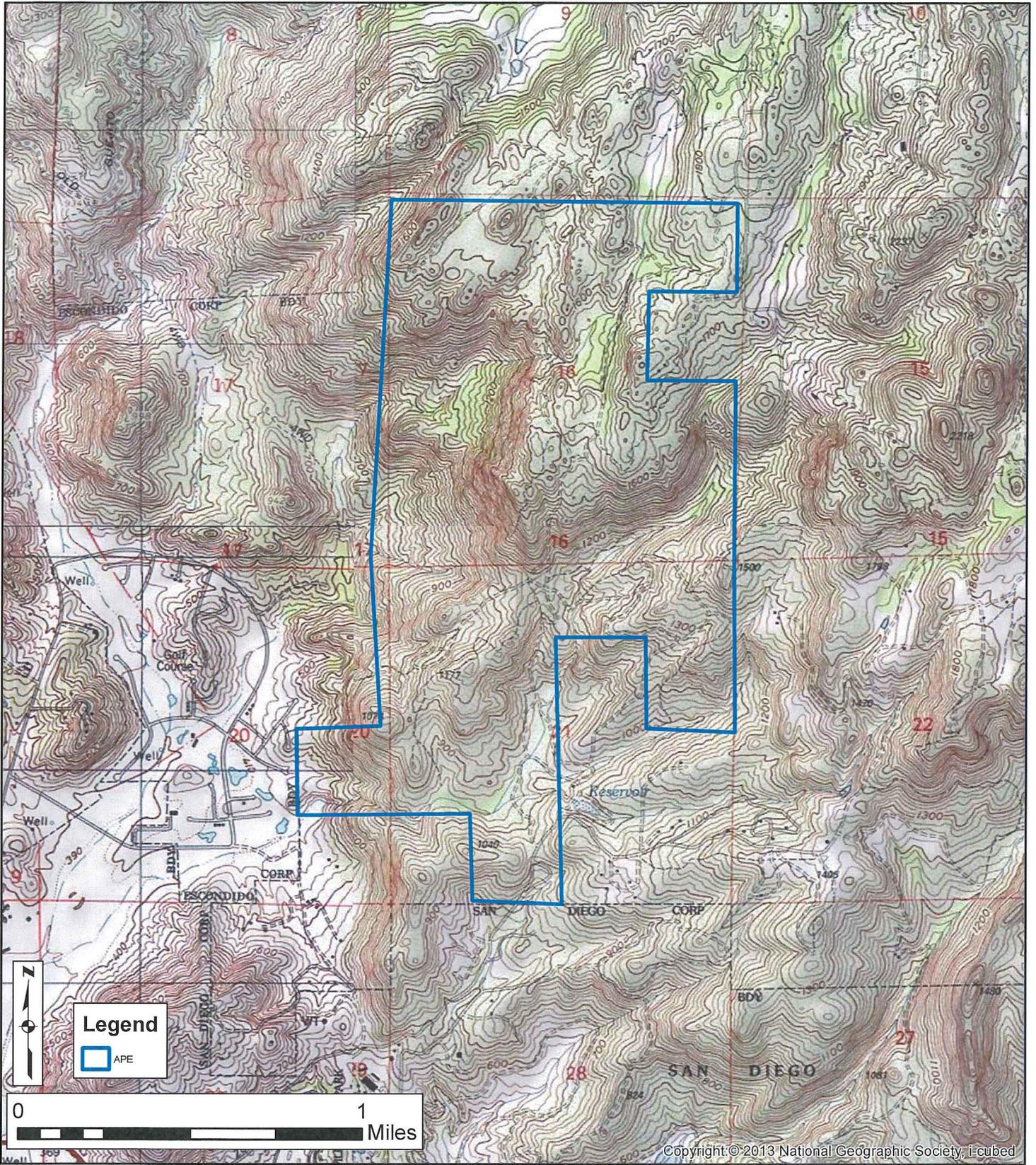
Phone: 858-484-0915

Fax: 858-679-9896

Email: tstropes@bfsa-ca.com

Project Description:

The project is a Phase I cultural resource study for a proposed development in San Diego County, CA. The project area can be found northeast of the intersection of West Zoo Road and Old Battlefield Road. The project location is in Section 20, 21 and 16 of the USGS 7.5 minute *Escondido, San Pasqual, and Rodriguez Mountain* California topographic maps (respectively), Townships 12 south, Range 1 west. A copy of the project map, with the project area and one-mile search radius buffer depicted thereon, has been included for your records.



Sacred Lands File Search Map
The Safari Highlands Project
USGS Escondido, San Pasqual, and Rodriguez Mountain 7.5-minute Quadrangles

STATE OF CALIFORNIA

Edmund G. Brown, Jr., Governor

NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Blvd., ROOM 100
West SACRAMENTO, CA 95691
(916) 373-3710
Fax (916) 373-5471



June 22, 2015

Tracy A. Stropes
Brian F. Smith and Associates, Inc.
14010 Poway Road, Suite A
Poway, CA 92064

Sent by Fax: (858) 679-9896
Number of Pages: 5

Re: Safari Highlands Project, San Diego County.

Dear Mr. Stropes,

A record search of the sacred land file has failed to indicate the presence of Native American cultural resources in the immediate project area. The absence of specific site information in the sacred lands file 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.

Enclosed is a list of Native Americans individuals/organizations who may have knowledge of cultural resources in the project area. The Commission makes no recommendation or preference of a single individual, or group over another. 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 or group. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from any of these individuals or groups, please notify me. With your assistance we are able to assure that our lists contain current information. If you have any questions or need additional information, please contact me at (916) 373-3712.

Sincerely,

A handwritten signature in cursive script that reads "Katy Sanchez".

Katy Sanchez
Associate Government Program Analyst

**Native American Contact List
San Diego County
June 19, 2015**

San Pasqual Band of Mission Indians
Allen E. Lawson, Chairperson
P.O. Box 365 Diegueno
Valley Center, CA 92082
allenl@sanpasqualtribe.org
(760) 749-3200

(760) 749-3876 Fax

Viejas Band of Kumeyaay Indians
Anthony R. Pico, Chairperson
P.O. Box 908 Diegueno/Kumeyaay
Alpine, CA 91903
jhagen@viejas-nsn.gov
(619) 445-3810

(619) 445-5337 Fax

Kumeyaay Cultural Historic Committee
Ron Christman
56 Viejas Grade Road Diegueno/Kumeyaay
Alpine, CA 91901
(619) 445-0385

Mesa Grande Band of Mission Indians
Mark Romero, Chairperson
P.O. Box 270 Diegueno
Santa Ysabel, CA 92070
mesagrandeband@msn.com
(760) 782-3818

(760) 782-9092 Fax

Pala Band of Mission Indians
Shasta Gaughen, PhD, THPO
PMB 50, 35008 Pala-Temecula Luiseno
Pala, CA 92059 Cupeno
sgaughen@palatribe.com
(760) 891-3515

(760) 742-3189 Fax

Pauma & Yuima Reservation
Randall Majel, Chairperson
P.O. Box 369 Luiseno
Pauma Valley CA 92061
(760) 742-1289 ext 317

(760) 742-3422 Fax

Pechanga Band of Mission Indians
Paul Macarro, Cultural Resources Manager
P.O. Box 1477 Luiseno
Temecula, CA 92593
pmacarro@pechanga-nsn.gov
(951) 770-8100

(951) 506-9491 Fax

Rincon Band of Mission Indians
Jim McPherson, Tribal Historic Pres. Officer
1 West Tribal Road Luiseno
Valley Center, CA 92082
vwhipple@rincontribe.org
(760) 297-2635

(760) 297-2639 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting locative Americans with regard to cultural resources for the proposed Safari Highlands Project, San Diego County.

**Native American Contact List
San Diego County
June 19, 2015**

Soboba Band of Mission Indians
Rosemary Morillo, Chairperson; Attn: Carrie Garcia
P.O. Box 487 Luiseno
San Jacinto , CA 92581
carrieg@soboba-nsn.gov
(951) 654-2765

(951) 654-4198 Fax

Inaja Band of Mission Indians
Rebecca Osuna, Chairman
2005 S. Escondido Blvd. Diegueno
Escondido , CA 92025
(760) 737-7628

(760) 747-8568 Fax

Kumeyaay Cultural Repatriation Committee
Steve Banegas, Spokesperson
1095 Barona Road Diegueno/Kumeyaay
Lakeside , CA 92040
sbanegas50@gmail.com
(619) 742-5587

(619) 443-0681 Fax

Pauma Valley Band of Luiseño Indians
Bennae Calac
P.O. Box 369 Luiseno
Pauma Valley CA 92061
bennaecalac@aol.com
(760) 617-2872

(760) 742-3422 Fax

Pauma & Yuima
ATTN: EPA
P.O. Box 369 Luiseno
Pauma Valley CA 92061
kymberli_peters@yahoo.com
(760) 742-1289

(760) 742-3422 Fax

Barona Group of the Capitan Grande
ATTN: Sheilla Alvarez
1095 Barona Road Diegueno
Lakeside , CA 92040
salvarez@barona-nsn.gov
(619) 443-6612

Viejas Band of Kumeyaay Indians
ATTN: Julie Hagen, Cultural Resources
P.O. Box 908 Diegueno/Kumeyaay
Alpine , CA 91903
jhagen@viejas-nsn.gov
(619) 445-3810
(619) 445-5337

Rincon Band of Mission Indians
Bo Mazzetti, Chairperson
1 West Tribal Road Luiseno
Valley Center, CA 92082
bomazzetti@aol.com
(760) 749-1051

(760) 749-8901 Fax

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**Native American Contact List
San Diego County
June 19, 2015**

San Pasqual Band of Indians
Kristie Orosco, Environmental Coordinator
P.O. Box 365 Diegueno
Valley Center, CA 92082
council@sanpasqualtribe.org
(760) 749-3200

(760) 749-3876 Fax

Ewiiapaayp Tribal Office
Will Micklin, Executive Director
4054 Willows Road Diegueno/Kumeyaay
Alpine, CA 91901
wmicklin@leaningrock.net
(619) 445-6315

(619) 445-9126 Fax

San Luis Rey Band of Mission Indians
Tribal Council
1889 Sunset Drive Luiseno
Vista, CA 92081
cjmojado@slrmissionindians.org
(760) 724-8505

(760) 724-2172 Fax

San Luis Rey Band of Mission Indians
Cultural Department
1889 Sunset Drive Luiseno
Vista, CA 92081 Cupeno
cjmojado@slrmissionindians.org
(760) 724-8505

(760) 724-2172 Fax

Pechanga Band of Mission Indians
Mark Macarro, Chairperson
P.O. Box 1477 Luiseno
Temecula, CA 92593
mgoodhart@pechanga-nsn.
(951) 770-6100

(951) 695-1778 Fax

La Jolla Band of Mission Indians
Lavonne Peck, Chairwoman
22000 Highway 76 Luiseno
Pauma Valley CA 92061
Rob.roy@lajolla-nsn.gov
(760) 742-3771

(760) 742-1704 Fax

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

lipay Nation of Santa Ysabel
Rodney Kephart, Environmental Coordinator
PO Box 130 Diegueno
Santa Ysabel, CA 92070
syirod@aol.com
(760) 765-0845

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7060.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting locative Americans with regard to cultural resources for the proposed Safari Highlands Project, San Diego County.

**Native American Contact List
San Diego County
June 19, 2015**

Pauma & Yuima Reservation
Charles Devers, Cultural Committee
P.O. Box 369 Luiseno
Pauma Valley CA 92061
(760) 742-1289

(760) 742-3422 Fax

Inter-Tribal Cultural Resource Protection Council
Frank Brown, Coordinator
240 Brown Road Diegueno/Kumeyaay
Alpine , CA 91901
frbrown@viejas-nsn.gov
(619) 884-6437

Tipay Nation of Santa Ysabel
Virgil Perez, Chairperson
P.O. Box 130 Diegueno/Kumeyaay
Santa Ysabel, CA 92070
(760) 765-0845

(760) 765-0320 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting locative Americans with regard to cultural resources for the proposed Safari Highlands Project, San Diego County.



June 23, 2015

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

Subject: Information regarding Native American cultural resources on or near the Safari Highlands Project, San Diego County, California

Dear Mr. Lawson:

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Safari Highlands Project. The information you provide will be used to assess areas of potential adverse impact within the proposed project's Area of Potential Effect (APE). Any information you might provide will be kept confidential and will not be divulged to the public.

The project is in San Diego County, California. The project as proposed includes the development of 550 luxury estate residential homes in five neighborhoods, which will be clustered to preserve the integrity of the existing topographical aesthetics across 1,098 acres. Up to 70 percent of the site is conserved open space in perpetuity. For additional information, see safarihighlandsranch.net. The project area can be found northeast of the intersection of West Zoo Road and Old Battlefield Road. Specifically, this project is located in Sections 20, 21, and 6 of the USGS 7.5-minute *Escondido, San Pasqual, and Rodriguez Mountain, California* topographic quadrangles (Township 12 South, Range 1 West). Please find enclosed sections of the USGS *Escondido, San Pasqual, and Rodriguez Mountain* topographic quadrangle maps on which the project is delineated.

Although a records search of the Sacred Lands File has failed to indicate the presence of Native American cultural resources in the immediate Safari Highlands Project area, the Native American Heritage Commission requested that we consult with you directly regarding the potential for the presence of Native American cultural resources that may be impacted by this project. If you do have information to provide regarding any resources on or near the project, please contact Brian Smith or myself at (858) 484-0915, or contact the City of Escondido directly. We would like to extend our thanks for your response regarding this issue.

Sincerely,

Tracy A. Stropes, M.A., RPA
Senior Project Archaeologist
tstropes@bfsa-ca.com

Attachment:

USGS 7.5-minute *Escondido, San Pasqual, and Rodriguez Mountain, California* topographic maps with project area delineated



June 23, 2015

Anthony R. Pico
Chairperson
Viejas Band of Kumeyaay Indians
P.O. Box 908
Alpine, California 91903

Subject: Information regarding Native American cultural resources on or near the Safari Highlands Project, San Diego County, California

Dear Mr. Pico:

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Safari Highlands Project. The information you provide will be used to assess areas of potential adverse impact within the proposed project's Area of Potential Effect (APE). Any information you might provide will be kept confidential and will not be divulged to the public.

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Sincerely,

Tracy A. Stropes, M.A., RPA
Senior Project Archaeologist
tstropes@bfsa-ca.com

Attachment:

USGS 7.5-minute *Escondido, San Pasqual, and Rodriguez Mountain, California* topographic maps with project area delineated



June 23, 2015

Bennae Calac
Pauma Valley Band of Luiseño Indians
P.O. Box 369
Pauma Valley, California 92061

Subject: Information regarding Native American cultural resources on or near the Safari Highlands Project, San Diego County, California

Dear Ms. Calac:

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Safari Highlands Project. The information you provide will be used to assess areas of potential adverse impact within the proposed project's Area of Potential Effect (APE). Any information you might provide will be kept confidential and will not be divulged to the public.

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Sincerely,

Tracy A. Stropes, M.A., RPA
Senior Project Archaeologist
tstropes@bfsa-ca.com

Attachment:

USGS 7.5-minute *Escondido, San Pasqual, and Rodriguez Mountain, California* topographic maps with project area delineated



June 23, 2015

Bo Mazzetti
Chairperson
Rincon Band of Mission Indians
1 West Tribal Road
Valley Center, California 92082

Subject: Information regarding Native American cultural resources on or near the Safari Highlands Project, San Diego County, California

Dear Mr. Mazzetti:

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Safari Highlands Project. The information you provide will be used to assess areas of potential adverse impact within the proposed project's Area of Potential Effect (APE). Any information you might provide will be kept confidential and will not be divulged to the public.

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Sincerely,

Tracy A. Stropes, M.A., RPA
Senior Project Archaeologist
tstropes@bfsa-ca.com

Attachment:

USGS 7.5-minute *Escondido*, *San Pasqual*, and *Rodriguez Mountain*, California topographic maps with project area delineated



June 23, 2015

Charles Devers
Cultural Committee
Pauma and Yuima Reservation
P.O. Box 369
Pauma Valley, California 92061

Subject: Information regarding Native American cultural resources on or near the Safari Highlands Project, San Diego County, California

Dear Mr. Devers,

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Safari Highlands Project. The information you provide will be used to assess areas of potential adverse impact within the proposed project's Area of Potential Effect (APE). Any information you might provide will be kept confidential and will not be divulged to the public.

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Sincerely,

Tracy A. Stropes, M.A., RPA
Senior Project Archaeologist
tstropes@bfsa-ca.com

Attachment:

USGS 7.5-minute *Escondido, San Pasqual, and Rodriguez Mountain, California* topographic maps with project area delineated



June 23, 2015

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

Subject: Information regarding Native American cultural resources on or near the Safari Highlands Project, San Diego County, California

Dear Mr. Linton,

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Safari Highlands Project. The information you provide will be used to assess areas of potential adverse impact within the proposed project's Area of Potential Effect (APE). Any information you might provide will be kept confidential and will not be divulged to the public.

The project is in San Diego County, California. The project as proposed includes the development of 550 luxury estate residential homes in five neighborhoods, which will be clustered to preserve the integrity of the existing topographical aesthetics across 1,098 acres. Up to 70 percent of the site is conserved open space in perpetuity. For additional information, see safarihighlandsranch.net. The project area can be found northeast of the intersection of West Zoo Road and Old Battlefield Road. Specifically, this project is located in Sections 20, 21, and 6 of the USGS 7.5-minute *Escondido, San Pasqual, and Rodriguez Mountain, California* topographic quadrangles (Township 12 South, Range 1 West). Please find enclosed sections of the USGS *Escondido, San Pasqual, and Rodriguez Mountain* topographic quadrangle maps on which the project is delineated.

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Sincerely,

Tracy A. Stropes, M.A., RPA
Senior Project Archaeologist
tstropes@bfsa-ca.com

Attachment:

USGS 7.5-minute *Escondido, San Pasqual, and Rodriguez Mountain, California* topographic maps with project area delineated



June 23, 2015

Frank Brown
Coordinator
Inter-Tribal Cultural Resource Protection Council
240 Brown Road
Alpine, California 91901

Subject: Information regarding Native American cultural resources on or near the Safari Highlands Project, San Diego County, California

Dear Mr. Brown,

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Safari Highlands Project. The information you provide will be used to assess areas of potential adverse impact within the proposed project's Area of Potential Effect (APE). Any information you might provide will be kept confidential and will not be divulged to the public.

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Tracy A. Stropes, M.A., RPA
Senior Project Archaeologist
tstropes@bfsa-ca.com

Attachment:

USGS 7.5-minute *Escondido, San Pasqual, and Rodriguez Mountain, California* topographic maps with project area delineated



June 23, 2015

Jim McPherson
Tribal Historic Preservation Officer
Rincon Band of Mission Indians
1 West Tribal Road
Valley Center, California 92082

Subject: Information regarding Native American cultural resources on or near the Safari Highlands Project, San Diego County, California

Dear Mr. McPherson:

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Safari Highlands Project. The information you provide will be used to assess areas of potential adverse impact within the proposed project's Area of Potential Effect (APE). Any information you might provide will be kept confidential and will not be divulged to the public.

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Tracy A. Stropes, M.A., RPA
Senior Project Archaeologist
tstropes@bfsa-ca.com

Attachment:

USGS 7.5-minute *Escondido, San Pasqual, and Rodriguez Mountain, California* topographic maps with project area delineated



June 23, 2015

Viejas Band of Kumeyaay Indians
Attn: Julie Hagen
Cultural Resources
P.O. Box 908
Alpine, California 91903

Subject: Information regarding Native American cultural resources on or near the Safari Highlands Project, San Diego County, California

Dear Ms. Hagen:

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Safari Highlands Project. The information you provide will be used to assess areas of potential adverse impact within the proposed project's Area of Potential Effect (APE). Any information you might provide will be kept confidential and will not be divulged to the public.

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Senior Project Archaeologist
tstropes@bfsa-ca.com

Attachment:

USGS 7.5-minute *Escondido*, *San Pasqual*, and *Rodriguez Mountain, California* topographic maps with project area delineated



June 23, 2015

Kristie Orosco
Environmental Coordinator
San Pasqual Band of Indians
P.O. Box 365
Valley Center, California 92082

Subject: Information regarding Native American cultural resources on or near the Safari Highlands Project, San Diego County, California

Dear Ms. Orosco:

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Safari Highlands Project. The information you provide will be used to assess areas of potential adverse impact within the proposed project's Area of Potential Effect (APE). Any information you might provide will be kept confidential and will not be divulged to the public.

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Senior Project Archaeologist
tstropes@bfsa-ca.com

Attachment:

USGS 7.5-minute *Escondido, San Pasqual, and Rodriguez Mountain, California* topographic maps with project area delineated



June 23, 2015

Lavonne Peck
Chairwoman
La Jolla Band of Mission Indians
22000 Highway 76
Pauma Valley, California 92061

Subject: Information regarding Native American cultural resources on or near the Safari Highlands Project, San Diego County, California

Dear Ms. Peck,

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Safari Highlands Project. The information you provide will be used to assess areas of potential adverse impact within the proposed project's Area of Potential Effect (APE). Any information you might provide will be kept confidential and will not be divulged to the public.

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Tracy A. Stropes, M.A., RPA
Senior Project Archaeologist
tstropes@bfsa-ca.com

Attachment:

USGS 7.5-minute *Escondido, San Pasqual, and Rodriguez Mountain, California* topographic maps with project area delineated



June 23, 2015

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

Subject: Information regarding Native American cultural resources on or near the Safari Highlands Project, San Diego County, California

Dear Mr. Macarro,

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Safari Highlands Project. The information you provide will be used to assess areas of potential adverse impact within the proposed project's Area of Potential Effect (APE). Any information you might provide will be kept confidential and will not be divulged to the public.

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Senior Project Archaeologist
tstropes@bfsa-ca.com

Attachment:

USGS 7.5-minute *Escondido*, *San Pasqual*, and *Rodriguez Mountain*, California topographic maps with project area delineated



June 23, 2015

Mark Romero
Chairperson
Mesa Grande Band of Mission Indians
P.O. Box 270
Santa Ysabel, California 92070

Subject: Information regarding Native American cultural resources on or near the Safari Highlands Project, San Diego County, California

Dear Mr. Romero:

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Safari Highlands Project. The information you provide will be used to assess areas of potential adverse impact within the proposed project's Area of Potential Effect (APE). Any information you might provide will be kept confidential and will not be divulged to the public.

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Senior Project Archaeologist
tstropes@bfsa-ca.com

Attachment:

USGS 7.5-minute *Escondido*, *San Pasqual*, and *Rodriguez Mountain, California* topographic maps with project area delineated



June 23, 2015

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

Subject: Information regarding Native American cultural resources on or near the Safari Highlands Project, San Diego County, California

Dear Mr. Macarro:

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Tracy A. Stropes, M.A., RPA
Senior Project Archaeologist
tstropes@bfsa-ca.com

Attachment:

USGS 7.5-minute *Escondido, San Pasqual, and Rodriguez Mountain, California* topographic maps with project area delineated



June 23, 2015

Pauma and Yuima Reservation
Attn: EPA
P.O. Box 369
Pauma Valley, California 92061

Subject: Information regarding Native American cultural resources on or near the Safari Highlands Project, San Diego County, California

To Whom It May Concern:

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Safari Highlands Project. The information you provide will be used to assess areas of potential adverse impact within the proposed project's Area of Potential Effect (APE). Any information you might provide will be kept confidential and will not be divulged to the public.

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Senior Project Archaeologist
tstropes@bfsa-ca.com

Attachment:

USGS 7.5-minute *Escondido*, *San Pasqual*, and *Rodriguez Mountain*, California topographic maps with project area delineated



June 23, 2015

Randall Majel
Chairperson
Pauma and Yuima Reservation
P.O. Box 369
Pauma Valley, California 92061

Subject: Information regarding Native American cultural resources on or near the Safari Highlands Project, San Diego County, California

Dear Mr. Majel:

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Senior Project Archaeologist
tstropes@bfsa-ca.com

Attachment:

USGS 7.5-minute *Escondido, San Pasqual, and Rodriguez Mountain, California* topographic maps with project area delineated



June 23, 2015

Rebecca Osuna
Chairman
Inaja Band of Mission Indians
2005 Escondido Boulevard
Escondido, California 92025

Subject: Information regarding Native American cultural resources on or near the Safari Highlands Project, San Diego County, California

Dear Ms. Osuna:

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Safari Highlands Project. The information you provide will be used to assess areas of potential adverse impact within the proposed project's Area of Potential Effect (APE). Any information you might provide will be kept confidential and will not be divulged to the public.

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Senior Project Archaeologist
tstropes@bfsa-ca.com

Attachment:

USGS 7.5-minute *Escondido, San Pasqual, and Rodriguez Mountain, California* topographic maps with project area delineated



June 23, 2015

Rodney Kephart
Environmental Coordinator
Iipay Nation of Santa Ysabel
P.O. Box 130
Santa Ysabel, California 92070

Subject: Information regarding Native American cultural resources on or near the Safari Highlands Project, San Diego County, California

Dear Mr. Kephart,

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Safari Highlands Project. The information you provide will be used to assess areas of potential adverse impact within the proposed project's Area of Potential Effect (APE). Any information you might provide will be kept confidential and will not be divulged to the public.

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Senior Project Archaeologist
tstropes@bfsa-ca.com

Attachment:

USGS 7.5-minute *Escondido, San Pasqual, and Rodriguez Mountain, California* topographic maps with project area delineated



June 23, 2015

Ron Christman
Kumeyaay Cultural Historic Committee
56 Viejas Grade Road
Alpine, California 91901

Subject: Information regarding Native American cultural resources on or near the Safari Highlands Project, San Diego County, California

Dear Mr. Christman:

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Senior Project Archaeologist
tstropes@bfsa-ca.com

Attachment:

USGS 7.5-minute *Escondido, San Pasqual, and Rodriguez Mountain, California* topographic maps with project area delineated



June 23, 2015

Rosemary Morillo, Chairperson
Attn: Carrie Garcia
Soboba Band of Mission Indians
P.O. Box 487
San Jacinto, California 92581

Subject: Information regarding Native American cultural resources on or near the Safari Highlands Project, San Diego County, California

Dear Ms. Morillo:

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Safari Highlands Project. The information you provide will be used to assess areas of potential adverse impact within the proposed project's Area of Potential Effect (APE). Any information you might provide will be kept confidential and will not be divulged to the public.

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Senior Project Archaeologist
tstropes@bfsa-ca.com

Attachment:

USGS 7.5-minute *Escondido*, *San Pasqual*, and *Rodriguez Mountain, California* topographic maps with project area delineated



June 23, 2015

San Luis Rey Band of Mission Indians
Cultural Department
1889 Sunset Drive
Vista, California 92081

Subject: Information regarding Native American cultural resources on or near the Safari Highlands Project, San Diego County, California

To Whom It May Concern:

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The project is in San Diego County, California. The project as proposed includes the development of 550 luxury estate residential homes in five neighborhoods, which will be clustered to preserve the integrity of the existing topographical aesthetics across 1,098 acres. Up to 70 percent of the site is conserved open space in perpetuity. For additional information, see safarihighlandsranch.net. The project area can be found northeast of the intersection of West Zoo Road and Old Battlefield Road. Specifically, this project is located in Sections 20, 21, and 6 of the USGS 7.5-minute *Escondido*, *San Pasqual*, and *Rodriguez Mountain*, California topographic quadrangles (Township 12 South, Range 1 West). Please find enclosed sections of the USGS *Escondido*, *San Pasqual*, and *Rodriguez Mountain* topographic quadrangle maps on which the project is delineated.

Although a records search of the Sacred Lands File has failed to indicate the presence of Native American cultural resources in the immediate Safari Highlands Project area, the Native American Heritage Commission requested that we consult with you directly regarding the potential for the presence of Native American cultural resources that may be impacted by this project. If you do have information to provide regarding any resources on or near the project, please contact Brian Smith or myself at (858) 484-0915, or contact the City of Escondido directly. We would like to extend our thanks for your response regarding this issue.

Sincerely,

Tracy A. Stropes, M.A., RPA
Senior Project Archaeologist
tstropes@bfsa-ca.com

Attachment:

USGS 7.5-minute *Escondido*, *San Pasqual*, and *Rodriguez Mountain*, California topographic maps with project area delineated



June 23, 2015

San Luis Rey Band of Mission Indians
Tribal Council
1889 Sunset Drive
Vista, California 92081

Subject: Information regarding Native American cultural resources on or near the Safari Highlands Project, San Diego County, California

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Senior Project Archaeologist
tstropes@bfsa-ca.com

Attachment:

USGS 7.5-minute *Escondido*, *San Pasqual*, and *Rodriguez Mountain, California* topographic maps with project area delineated



June 23, 2015

Shasta Gaughen, Ph.D.
Tribal Historic Preservation Officer
Pala Band of Mission Indians
35008 Pala Temecula Road, PMB 50
Pala, California 92059

Subject: Information regarding Native American cultural resources on or near the Safari Highlands Project, San Diego County, California

Dear Ms. Gaughen:

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Safari Highlands Project. The information you provide will be used to assess areas of potential adverse impact within the proposed project's Area of Potential Effect (APE). Any information you might provide will be kept confidential and will not be divulged to the public.

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Senior Project Archaeologist
tstropes@bfsa-ca.com

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USGS 7.5-minute *Escondido*, *San Pasqual*, and *Rodriguez Mountain, California* topographic maps with project area delineated



June 23, 2015

Barona Group of the Capitan Grande
Attn: Sheilla Alvarez
1095 Barona Road
Lakeside, California 92040

Subject: Information regarding Native American cultural resources on or near the Safari Highlands Project, San Diego County, California

Dear Ms. Alvarez:

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Safari Highlands Project. The information you provide will be used to assess areas of potential adverse impact within the proposed project's Area of Potential Effect (APE). Any information you might provide will be kept confidential and will not be divulged to the public.

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Senior Project Archaeologist
tstropes@bfsa-ca.com

Attachment:

USGS 7.5-minute *Escondido, San Pasqual, and Rodriguez Mountain, California* topographic maps with project area delineated



June 23, 2015

Steve Banegas
Spokesperson
Kumeyaay Cultural Repatriation Committee
1095 Barona Road
Lakeside, California 92040

Subject: Information regarding Native American cultural resources on or near the Safari Highlands Project, San Diego County, California

Dear Mr. Banegas:

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Senior Project Archaeologist
tstropes@bfsa-ca.com

Attachment:

USGS 7.5-minute *Escondido*, *San Pasqual*, and *Rodriguez Mountain, California* topographic maps with project area delineated



June 23, 2015

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

Subject: Information regarding Native American cultural resources on or near the Safari Highlands Project, San Diego County, California

Dear Mr. Perez,

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Safari Highlands Project. The information you provide will be used to assess areas of potential adverse impact within the proposed project's Area of Potential Effect (APE). Any information you might provide will be kept confidential and will not be divulged to the public.

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Senior Project Archaeologist
tstropes@bfsa-ca.com

Attachment:

USGS 7.5-minute *Escondido*, *San Pasqual*, and *Rodriguez Mountain*, California topographic maps with project area delineated



June 23, 2015

Will Micklin
Executive Director
Ewiiapaayp Tribal Office
4054 Willows Road
Alpine, California 91901

Subject: Information regarding Native American cultural resources on or near the Safari Highlands Project, San Diego County, California

Dear Mr. Micklin:

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Safari Highlands Project. The information you provide will be used to assess areas of potential adverse impact within the proposed project's Area of Potential Effect (APE). Any information you might provide will be kept confidential and will not be divulged to the public.

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Senior Project Archaeologist
tstropes@bfsa-ca.com

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APPENDIX IV

**Table 6.1-3:
Bedrock Milling Feature Data, Site SDI-14,770**

Table 6.1-3
Bedrock Milling Feature Data
Site SDI-14,770

Feature	Surface	Type	Dimensions (cm)
A	1	Mortar	14x15x3
	2	Collar	75x54x0.5
	3	Slick	42x20x0.01
	4	Slick	44x26x0.01
	5	Rub	78x63x0.01
	6	Rub	47x58x0.01
	7	Rub	59x86x0.01
	8	Rub	72x85x0.01
	9	Slick	24x21x0.01
	10	Rub	23x33x0.01
	11	Slick	20x41x0.01
	12	Slick	24x20x0.01
	13	Slick	23x27x0.01
	14	Slick	24x34x0.01
	15	Rub	54x29x0.01
	16	Rub	11x19x0.01
	17	Slick	26x35x0.01
	18	Slick	29x27x0.01
	19	Rub	34x23x0.01
	20	Rub	27x16x0.01
	21	Collar	44x38x0.01
	22	Mortar	14x12x2.2
	23	Mortar	16x16x7
	24	Slick	35x19x0.01
	25	Rub	23x30x0.01
	26	Basin	26x24x2
	27	Collar	50x46x0.01
	28	Mortar	22x22x13
	29	Slick	20x17x0.01
B	1	Slick	13x10x0.01
	2	Slick	13x11x0.01
	3	Slick	19x12x0.01
	4	Slick	19x11x0.01
	5	Mortar	22x21x14
	6	Slick	16x12x0.01
	7	Slick	16x10x0.01

Feature	Surface	Type	Dimensions (cm)
	8	Slick	10x12x0.01
	9	Mortar	23x19x1.5
	10	Slick	28x17x0.01
	11	Slick	23x18x0.01
	12	Slick	16x26x0.01
	13	Slick	24x28x0.01
	14	Mortar	23x23x21
	15	Slick	13x10x0.01
	16	Slick	12x17x0.01
	17	Slick	14x12x0.01
	18	Mortar	22x18x17
19	Slick	23x38x0.01	
C	1	Slick	38x35x0.01
	2	Slick	35x24x0.01
	3	Slick	30x54x0.01
	4	Slick	28x30x0.01
	5	Slick	48x45x0.01
	6	Slick	19x24x0.01
	7	Slick	42x60x0.01
	8	Slick	23x17x0.01
D	1	Slick	36x41x0.01
	2	Basin	13x13x3
	3	Slick	39x23x0.01
	4	Slick	23x24x0.01
	5	Slick	15x19x0.01
	6	Slick	10x13x0.01
	7	Slick	21x15x0.01
	8	Mortar	24x23x15
	9	Slick	32x41x0.01
	10	Slick	40x25x0.01
	11	Mortar	26x25x16
E	1	Cupule	8x7x0.5
	2	Cupule	7x6x1.75
	3	Cupule	6x6x0.5
	4	Cupule	7x8x0.25
	5	Cupule	6x6x0.5
	6	Cupule	6x6x0.25
	7	Cupule	7x6x0.25
	8	Cupule	7x7x0.5
	9	Cupule	7x8x0.25

Feature	Surface	Type	Dimensions (cm)
	10	Cupule	9x4x2
	11	Cupule	10x10x2.25
	12	Cupule	8x8x0.25
	13	Cupule	10x4x2
	14	Cupule	7x6x0.25
	15	Cupule	6x6x0.25
	16	Cupule	7x6x0.25
	17	Cupule	8x7x0.25
F	1	Slick	18x15x1.5
	2	Slick	25x23x0
	3	Slick	21x20x0
	4	Slick	21x14x0
	5	Slick	15x14x0
G	1	Slick	15x15x0.01
	2	Slick	36x29x0.01
H	1	Mortar	22x16x10.5
	2	Slick	17x11x0.01
	3	Slick	14x13x1.5
	4	Slick	26x20x0.01
	5	Slick	28x24x0.01
	6	Slick	26x21x0.01
	7	Slick	25x19x0.01
I	1	Slick	26x17x0
	2	Slick	16x20x0
J	1	Slick	31x28x0.01
	2	Slick	23x24x0.01
	3	Slick	20x23x0.01
	4	Rub	31x26x0.01
	5	Slick	29x25x0.01
	6	Collar	40x50x0.01
	7	Mortar	16x17x6.5
	8	Slick	29x33x0.01
	9	Slick	18x20x0.01
	10	Mortar	15x16x3
	11	Basin	26x40x0.5
	12	Slick	23x26x0.01
	13	Slick	40x42x0.01
	14	Slick	22x28x0.01
	15	Rub	51x54x0.01
	16	Slick	37x45x0.01

Feature	Surface	Type	Dimensions (cm)
	17	Slick	52x44x0.01
	18	Slick	60x64x0.01
	19	Slick	46x38x0.01
	20	Slick	46x41x0.01
	21	Slick	43x35x0.01
	22	Rub	20x23x0.01
	23	Rub	21x45x0.25
	24	Collar	54x55x0.01
	25	Mortar	21x20x9.5
	26	Rub	26x18x0.01
	27	Rub	45x30x0.01
	28	Rub	64x63x0.01
	29	Mortar	20x18x7
	30	Rub	23x41x0.01
	31	Slick	46x49x0.01
	32	Rub	38x33x0.01
	33	Slick	35x20x0.01
	34	Mortar	15x17x6
	35	Slick	36x30x0.01
	36	Collar	42x34x0.01
	37	Mortar	15x15x5
	38	Rub	34x31x0.01
	39	Rub	24x31x0.01
	40	Collar	30x36x0.01
	41	Mortar	16x17x5
42	Mortar	21x23x14.5	
43	Slick	47x39x0.01	
44	Collar	37x38x0.01	
45	Mortar	16x17x7	
K	1	Basin/Slick	30x20x3
L	1	Slick	40x33x0.01
	2	Slick	18x17x0.01
	3	Slick	50x47x0.01
	4	Collar	39x38x0.01
	5	Mortar	22x20x4.5
	6	Slick	40x32x0.01
	7	Slick	39x27x1
	8	Slick	43x34x0.01
	9	Slick	29x23x0.01
	10	Collar	42x34x0.01

Feature	Surface	Type	Dimensions (cm)
	11	Mortar	13x13x2
	12	Collar	26x21x0.01
	13	Mortar	17x15x6
	14	Collar	52x46x0.01
	15	Mortar	25x25x11
	16	Slick	51x34x0.01
	17	Slick	35x21x0.01
	18	Slick	55x36x0.01
	19	Slick	36x33x0.01
	20	Slick	60x34x2.5
	21	Collar	53x43x0.01
	22	Mortar	27x26x14
	23	Slick	32x26x0.01
	24	Collar	44x34x0.01
	25	Mortar	13x12x2.5
	26	Slick	60x43x0.01
	27	Slick	52x31x0.01
	28	Mortar	13x10x3
	29	Slick	66x37x0.01
	30	Slick	25x16x0.01
	31	Collar	30x28x0.01
	32	Mortar	14x13x2
	33	Slick	30x16x0.01
	34	Slick	30x24x0.01
	35	Slick	53x40x0.01
	36	Slick	44x30x0.01
	37	Slick	43x18x0.01
	38	Slick	18x16x0.01
	39	Basin	33x22x3
	40	Slick	29x23x0.01
	41	Collar	30x28x0.01
	42	Mortar	14x14x3
	43	Slick	58x53x0.01
	44	Slick	43x30x0.01
	45	Collar	53x40x2.8
	46	Mortar	20x17x5.5
	47	Slick	56x23x0.01
	48	Slick	45x26x.01
	49	Slick	68x58x0.01
	50	Slick	31x30x0.01

Feature	Surface	Type	Dimensions (cm)
	51	Slick	22x18x.01
	52	Slick	31x24x0.01
	53	Slick	58x37x0.01
	54	Slick	50x25x0.01
	55	Slick	20x14x0.01
M	1	Slick	27x24x<0.01
N	1	Slick	33x38x0.01
	2	Slick	21x20x0.01
	3	Slick	23x19x0.01
	4	Slick	17x19x0.01
O	1	Slick	54x35x0.01
	2	Rub	75x74x0.01
	3	Slick	47x20x0.01
	4	Slick	50x49x0.01
	5	Slick	50x49x0.01
	6	Rub	44x39x0.01
	7	Slick	43x44x0.01
	8	Rub	33x21x0.01
	9	Slick	40x42x0.01
	10	Slick	41x31x0.01
	11	Basin	29x38x1
	12	Slick	24x23x0.01
	13	Rub	56x38x0.01
	14	Slick	60x49x0.01
	15	Rub	48x36x0.01
	16	Rub	34x36x0.01
	17	Rub	17x19x0.01
	18	Rub	15x15x0.01
P	1	Slick	13x11x0
	2	Basin	44x22x2
Q	1	Slick	38x25x0.01
R	1	Basin	18x15x2

APPENDIX V

Confidential Maps

(Deleted for Public Review; Bound Separately)