



SAN PASQUAL BAND OF MISSION INDIANS

SAN PASQUAL RESERVATION

April 12, 2017

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Michael D. Ott, Executive Director
San Diego LAFCO
9335 Hazard Way, Suite 200
San Diego, CA 92123

Subject: Safari Highlands Project

Dear Mr. Ott:

Our tribe was contacted by letter from Tracy A. Stropes, Senior Project Archaeologist with Brian F. Smith and Associates, Inc. (BFSA) in June 2015 notifying us of plans to build the Safari Highlands Ranch (SHR) project in Escondido, CA. Per our response letter to BFSA, dated July 17, 2015, we noted the San Pasqual Band's ancestral ties to the land in question and our concern, given the location and size of the project, that culturally significant items would likely exist in the proposed project area. In that letter, we asked to be notified if cultural sites were located. We received no further correspondence. We are dismayed to recently learn that despite our request to be notified, cultural sites have, in fact, been identified on the project site. Specifically, BFSA drafted and submitted *An Archaeological/Historical Study for the Safari Highlands Ranch Project* dated July 6, 2015 detailing the most recent archeological study of the area. We have several concerns about its findings.

The 2015 BFSA report noted that there have been at least two prior archeological studies of the area conducted as part of earlier, failed development attempts. In the current report, 49 cultural sites were identified on the proposed site of Safari Highlands Ranch. Of the 49 cultural sites identified, four sites were considered CEQA-significant. Of those, two sites are within the proposed construction zone and "direct impact cannot be avoided" (pg. 8.0-3).

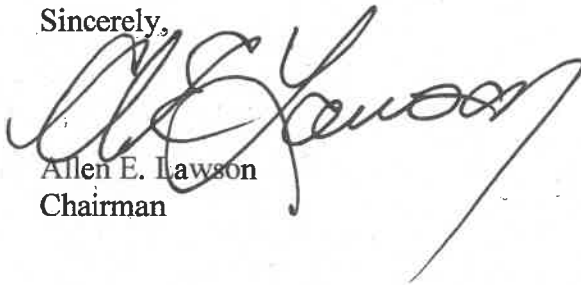
It is notable that the BFSA report also indicated that some sites identified in previous studies were unable to be located as part of the current study. The report stated that because of the "large number of cultural resources within the project and the fact that past uses or dense ground cover may have masked additional sites, all brushing and grading within the Safari Highlands Ranch Project area shall be monitored." (pg. 8.0-2)

In addition to the historical and cultural importance of the project area to our tribe, we also have serious concerns about the biological impact of development in that area.

The Biological Technical Report submitted by Althouse and Meade, Inc. in June 2015 noted a variety of habitats and sensitive species in the project area, stating the project would “permanently impact habitats and vegetation over about one-third of the project area...” (pg. 31).

With our rich ancestral ties to the land, the numerous documented cultural resource sites, and our concern for the impact on important biological resources, we object to any large-scale development in this area and are therefore strongly opposed the Safari Highlands Ranch project.

Sincerely,

A handwritten signature in black ink, appearing to read "Allen E. Lawson". The signature is fluid and cursive, with a long, sweeping tail that extends downwards and to the right.

Allen E. Lawson
Chairman