ATTACHMENT D.5

CULTURAL RESOURCES SURVEY

Cultural Resources Survey for the Santa Fe Flores Townhomes Project San Marcos, California

Project Nos. GPA25-0001, R25-0001, MFSDP25-0001, and TSM25-0001

Prepared for
Santa Fe Flores, LP
P.O. Box 903
Rancho Santa Fe, CA 92067
Contact: Paul Mayer

Prepared by
RECON Environmental, Inc.
3111 Camino del Rio North, Suite 600
San Diego, CA 92108
P 619.308.9333

RECON Number 10587
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Nathanial Yerka, Project Archaeologist/Author

Carmen Zepeda-Herman, M.A., RPA, Principal Investigator

NATIONAL ARCHAEOLOGICAL DATA BASE INFORMATION

Author:	Nathanial Yerka, Project Archaeologist Carmen Zepeda-Herman, M.A., RPA, Principal Investigator
Consulting Firm:	RECON Environmental, Inc. 3111 Camino del Rio North, Suite 600 San Diego, CA 92108
Report Date:	January 29, 2026
Report Title:	Cultural Resources Survey for the Santa Fe Flores Townhomes Project, San Marcos, California (GPA25-0001, R25-0001, MFSDP25-0001, and TSM25-0001)
Submitted to:	Mr. Paul Mayer
Prepared for:	Santa Fe Flores, LP P.O. Box 903 Rancho Santa Fe, CA 92067
Project Number:	RECON Number 10587
USGS Quadrangle Map:	7.5-minute, San Marcos
Acres:	2.72 (net)
Keywords:	Negative archaeological survey; San Marcos quadrangle

RECON Environmental, Inc. (RECON) conducted a cultural resources inventory for the proposed Santa Fe Flores Townhomes Project. The survey covered 2.72 acres, which includes the 2.6-acre (net) project area located at 2966, 2972, and 2982 South Santa Fe Avenue (Assessor's Parcel Numbers 217-161-18, 217-161-19, and the northern portion of 217-161-17) and 0.12 acres of off-site improvements.

The cultural resources surveys took place on March 10, 2022, and November 12, 2024, using a survey interval of approximately seven meters across the property. The RECON archaeologist was accompanied by a Luiseño representative from Saving Sacred Sites during both surveys.

No significant prehistoric or historic cultural resources were observed during the survey of the project area. No prehistoric or historic cultural resources were mapped on or immediately adjacent to the property in the record search files. Therefore, the proposed project will have no impact on known prehistoric or historic cultural resources. However, the possibility exists for buried prehistoric archaeological deposits on-site. Because of this factor, RECON recommends that all ground-disturbing activities for the project be monitored by a qualified archaeological monitor and Native American monitors representing the Luiseño community.

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1: Native American Heritage Commission and Tribal Response

CONFIDENTIAL ATTACHMENT (Under Separate Cover)

1: Records Search: Historical Resources with Primary and Trinomial Designations; Reports; Historic Addresses

Acronyms and Abbreviations

APN	Assessor's Parcel Number
C.E.	Common Era
CEQA	California Environmental Quality Act
CRHR	California Register of Historical Resources
GPA	General Plan Amendment
MFSDP	Multi-Family Site Development Plan
MND	Mitigated Negative Declaration
NAHC	Native American Heritage Commission
project	Santa Fe Flores Townhomes Project
RECON	RECON Environmental, Inc.

Summary

RECON Environmental conducted a cultural resources inventory, in accordance with the California Environmental Quality Act (CEQA) and the California Register of Historical Resources for the proposed Santa Fe Flores Townhomes Project (project). The survey covered the 2.6-acre (net) project area and 0.12 acres of off-site improvements for a total of 2.72 acres surveyed. The project area occurs on Assessor's Parcel Numbers (APNs) 217-161-18, 217-161-19 (2972 and 2982 South Santa Fe Avenue) and 0.37 acres of the northern portion of APN 217-161-17 (2966 South Santa Fe Avenue).

On February 28, 2023, the City Council adopted a Mitigated Negative Declaration (MND; ND22-008; State Clearinghouse Number 2022090486), approved a General Plan Amendment (GPA; GPA21-0008), approved a Multi-Family Site Development Plan (MFSDP21-0002), and on March 14, 2023 approved a Rezone (R21-0004) for the Santa Fe Flores, LP Project (approved project). The approved project evaluated the impacts associated with a GPA to change the land use from Commercial (C) and Light Industrial (L-I) to Medium Density Residential 2 (MDR2) and a zone change from Commercial (C) and Light Industrial (L-I) to Multi-Family Residential (R-3-10) to allow for the construction of 50 multi-family residential townhome units, in conjunction with a Density Bonus, on a 2.23-acre site consisting of two parcels: APNs 217-161-18 and 217-161-19.

Subsequent to MND approval, the applicant modified the site plan and added 0.37 acres of APN 217-161-17. The project would require a GPA from Medium Density Residential 2 (MDR2) to Medium High Density Residential (MHDR) for APNs 217-161-18 and 217-161-19, and a GPA from Commercial (C) to Medium High Density Residential (MHDR) for 0.37 acres of the northern portion of APN 217-161-17. Additionally, the project would rezone APNs 217-161-18 and 217-161-19 from Multi-Family Residential 3 (R-3-10) to Multi-Family Residential (R-3-6) and 0.37 acres of the northern portion of APN 217-161-17 from Commercial (C) to Multi-Family Residential (R-3-6). The project would develop 46 multi-family residential townhome units in seven buildings that would be three stories and 35 feet 4 inches in height. Vehicle parking would include 92 spaces within attached garages and 15 guest spaces. The liquor store would not be part of the project and would remain. Project grading would include 23,300 cubic yards of cut and 3,200 cubic yards of fill, resulting in a net export of 20,100 cubic yards.

RECON requested a records search at the South Coastal Information Center, San Diego State University. The search radius was one mile. No prehistoric or historic cultural resources are recorded on or adjacent to the project area. A total of 31 cultural resources has been documented within one mile of the project boundary, including 9 prehistoric period resources and 22 historic period resources. In addition, there are 19 historic addresses listed within the one-mile search radius.

The cultural resources surveys took place on March 10, 2022, and November 12, 2024, using a survey interval of approximately seven meters across the property. The RECON archaeologist was accompanied by a Luiseño representative from Saving Sacred Sites during both surveys. No significant prehistoric or historic archaeological resources were observed during the survey of the project area. The project will have no impact on known prehistoric or historic cultural resources. However, the possibility exists for the buried prehistoric archaeological deposits to exist on-site. Because of this factor, RECON recommends that all ground-disturbing activities for the project be monitored by a qualified archaeological monitor and Native American monitors representing the Luiseño community.

1.0 Introduction

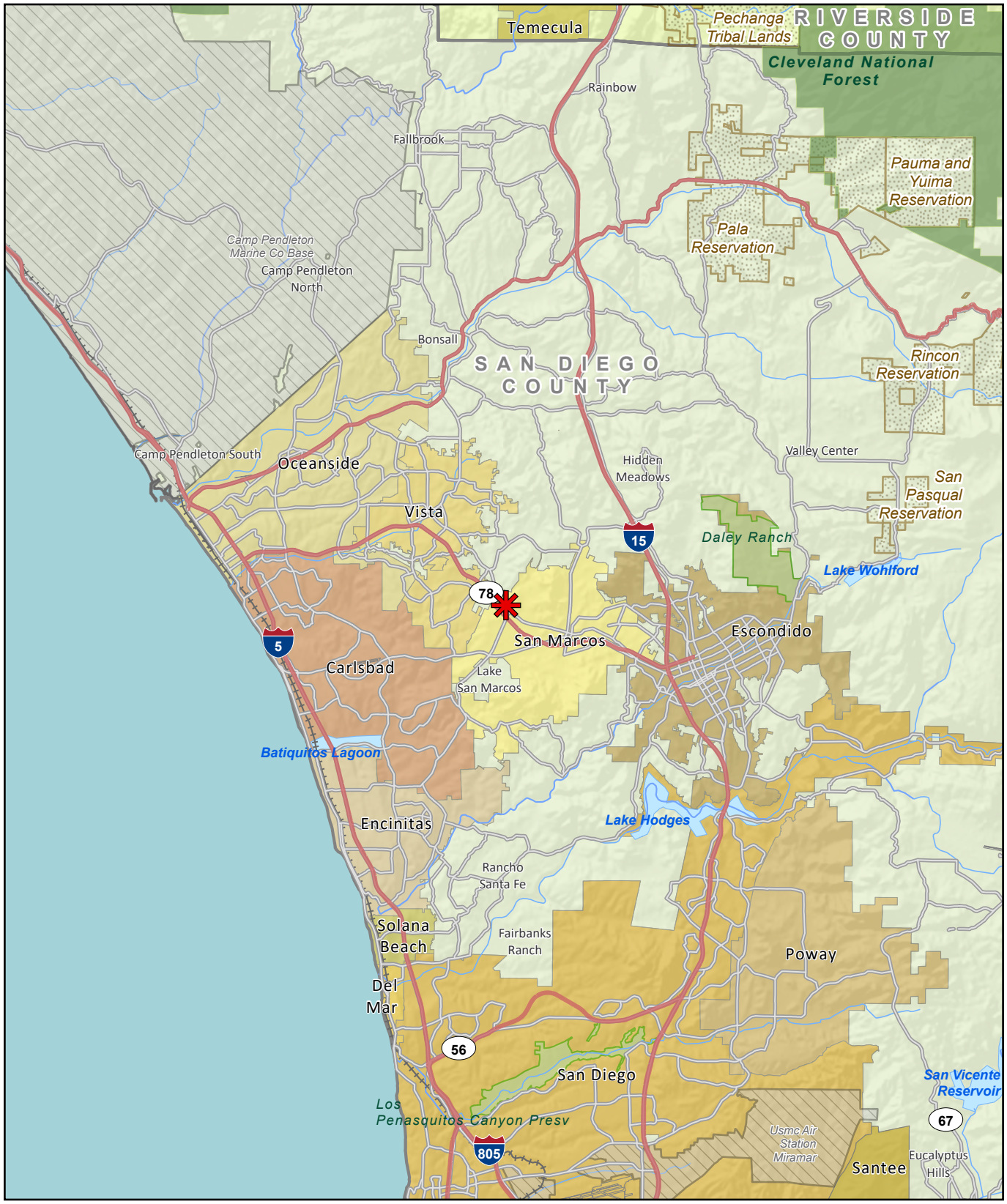
The Santa Fe Flores Townhomes Project (project) is located in the city of San Marcos at 2966, 2972, and 2982 South Santa Fe Avenue adjacent to Las Flores Drive on Assessor Parcel Numbers (APNs) 217-161-18, 217-161-19, and the northern portion (0.37 acres) of 217-161-17 (Figure 1). The 2.6-acre (net) project area would require a General Plan Amendment (GPA) from Medium Density Residential 2 (MDR2) to Medium High Density Residential (MHDR) for APNs 217-161-18 and 217-161-19, and a GPA from Commercial (C) to Medium High Density Residential (MHDR) for the northern portion of APN 217-161-17. Additionally, the project would rezone APNs 217-161-18 and 217-161-19 from Multi-Family Residential 3 (R-3-10) to Multi-Family Residential (R-3-6) and rezone the northern portion of APN 217-161-17 from Commercial (C) to Multi-Family Residential (R-3-6). The project would develop 46 multi-family residential townhome units in seven buildings that would be three stories in height. Vehicle parking would include 92 spaces within attached garages and 15 guest spaces. The liquor store, Gourmet Liquor, located on the southern portion of APN 217-161-17 is not part of the project and would remain. Off-site improvements total 0.12 acres. The project would require 23,300 cubic yards of cut and 3,200 cubic yards of fill, for a net export of 20,100 cubic yards.

The project area is in an unsectioned portion of the Los Vallecitos de San Marcos land grant, of the U.S. Geological Survey 7.5-minute topographic map, San Marcos quadrangle (Figure 2; U.S. Geological Survey 1996). The project area is mostly vacant and undeveloped land with an adjacent liquor store and associated improved parking area to the southwest. It is surrounded on the west and north by industrial development, to the east by multi-family residential development, and to the south by single-family residential development (Figure 3). The area of potential effect includes the 2.6-acre (net) project area and the 0.12 acres of off-site improvements for a total of 2.72 acres.

2.0 Natural Setting

The project area dominated by disturbed habitat which includes areas that have been disturbed through frequent off-roading activity. The project area is comprised of non-native herbaceous cover mixed with non-native grasses. A smaller portion of the project area consists of urban/developed land which features landscaping that receives routine maintenance and irrigation; this area occurs along the eastern boundary of the project area and consists of ornamental vegetation. The elevation of the project area ranges between approximately 495 feet above mean sea level in the south and 550 above mean sea level to the north.

Soils within the project area consist of Diablo clay on the northern portion and Huerhuero loam on the southern portion (U.S. Department of Agriculture 1973). The Diablo clay series with 9 to 15 percent slopes occurs on strong slopes and ranges from 26 to 37 inches in depth over rock. The Huerhuero loam soil series is loam soils developed in sandy marine sediments and have slopes ranging from 2 to 9 percent. In a representative profile the surface layer is brown and pale brown, strongly acid to medium acid loam. The upper subsoil is brown moderately alkaline clay. Below this is brown mildly alkaline clay loam and sandy loam (U.S. Department of Agriculture 1973).



0 Miles 5

Project Location

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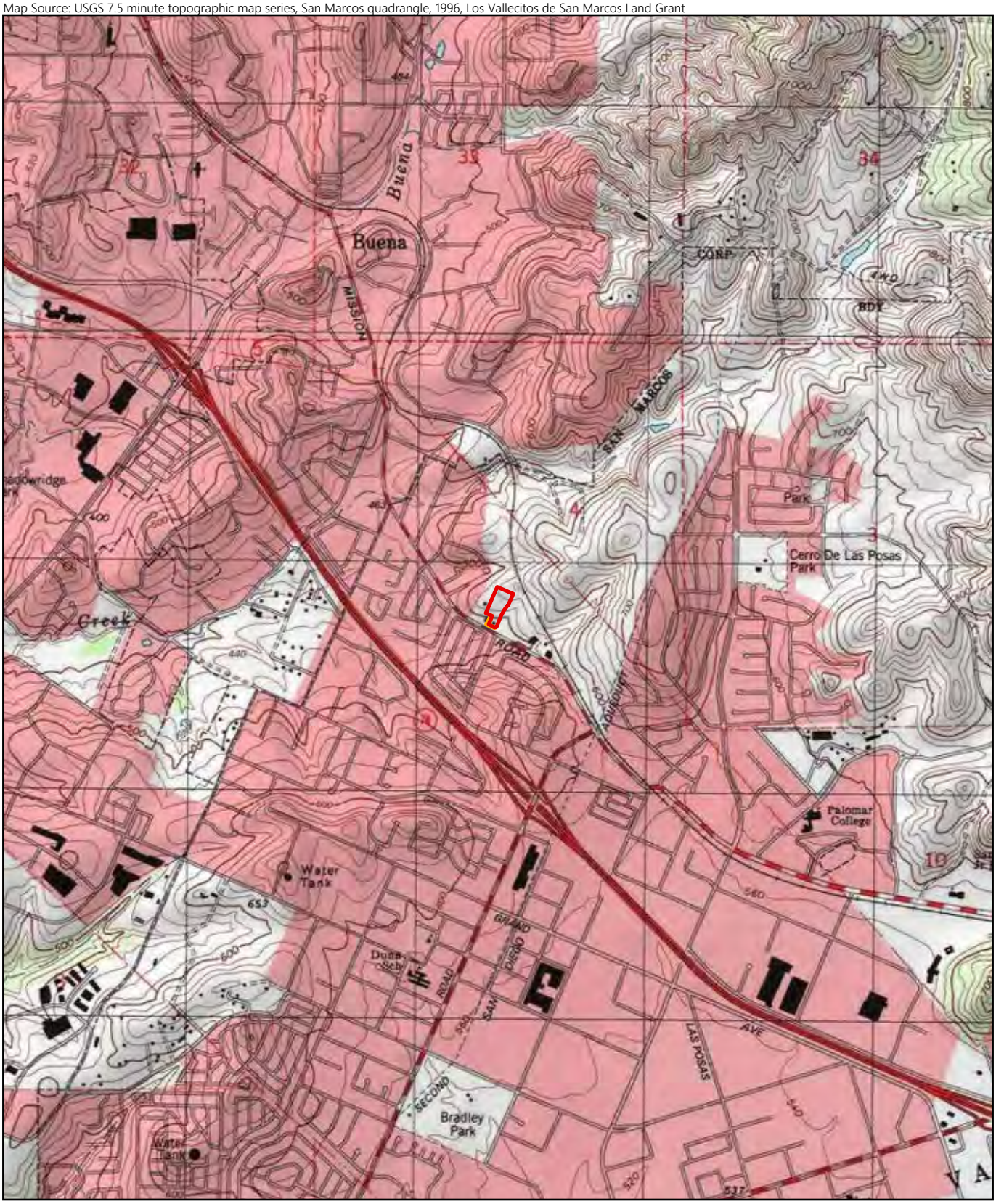
FIGURE 1
Regional Location

Map Source: USGS 7.5 minute topographic map series, San Marcos quadrangle, 1996, Los Vallecitos de San Marcos Land Grant



0 Feet 2,000

Project Boundary

Off-site Improvements

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FIGURE 2
Project Location on USGS Map

Image Source: Nearmap (flown May 2025)

Project Boundary

Off-site Improvements

2024 Survey Area

2022 Survey Area

0 Feet 200

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FIGURE 3

Project Location on Aerial Photograph

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3.0 Cultural Setting

3.1 Paleoindian Period

The Paleoindian Period in northern San Diego County is most closely associated with the San Dieguito Complex, as identified by Malcolm Rogers (1938, 1939, 1945) and Claude N. Warren (1961, 1964, 1966, 1967). The San Dieguito Complex includes the Lake Mohave sites, Death Valley I sites, and Playa I and II sites according to Warren (1967) and represents a generalized hunting tradition (Moratto 2004). The San Dieguito Complex can be found in all of San Diego County, parts of Riverside County, north through the Mohave Desert, east through western Arizona, and south into northern Baja California and northern Sonora (Rogers 1966). The San Dieguito Complex assemblage is dominated by finely made scraping and chopping tools, such as well-made scraper planes, choppers, scraping tools, crescentics, elongated bifacial knives, and leaf-shaped projectile points. These tools were often made of fine-grained, slate-green felsite, or fine-grained basalt. Projectile points consist of Lake Mojave and Silver Lake types along with non-diagnostic leaf-shaped points. Evidence of seed grinding technology (manos and metates) is scarce. San Dieguito sites in the desert are typically found around dry Pleistocene playas (Moratto 2004). Site locations and assemblages suggest a subsistence emphasis on lacustrine resources and big game hunting.

3.2 Archaic Period

The Archaic Period in northern San Diego County is represented by the Pauma Complex, a local manifestation of the widespread Millingstone Horizon (Wallace 1955). The Millingstone Horizon has been identified throughout coastal southern and central California and includes La Jolla Complex of the San Diego region and the Pauma Complex in the foothills of San Diego and Riverside counties. These have very similar assemblages and are thought to be different environmental adaptations of the same culture (True 1958). A similar assemblage has been identified in the Cajon Pass area of Riverside County and is referred to as the Sayles Complex (Kowta 1969). This is thought to be transitional between the Pinto Complex of the Mojave Desert and the Millingstone Horizon of the coast (Kowta 1969:1).

The Pauma Complex assemblage suggests a generalized subsistence focus with an emphasis on hard seeds. This emphasis is indicated by the appearance of numerous slab and basin metates and the adoption of a mixed cobble/core-based tool assemblage composed primarily of crudely made choppers, scrapers, and cobble hammerstones.

Pauma Complex sites are typically found on terraces or ridges above a water source such as a stream. They often do not have discernible midden development, but they may have subsurface deposits. While they typically have numerous portable metates and manos, they lack bedrock milling, and mortars and pestles (True and Waugh 1981:101-102).

Major technological change within the Archaic Period in San Diego County appears to have been limited mainly to the introduction of large side-notched and Elko series projectile points. There seems to have been some reorientation in settlement from coastal to inland settings during the latter

portion of this period in northern San Diego County. This settlement shift appears to have occurred around 4,000 years ago and is thought to relate to the final phases of Holocene sea level rise and the resulting siltation of coastal lagoons. Prior to this time, the lagoons had been highly productive sources of shellfish for La Jollan people (Gallegos 1987; Warren et al. 1993).

3.3 Late Prehistoric Period

Near the coast and in the Peninsular Mountains beginning approximately 1,500 years ago, patterns began to emerge that suggest the ethnohistoric Kumeyaay. The Late Prehistoric Period is characterized by higher population densities and elaborations in social, political, and technological systems. Economic systems diversified and intensified during this period, with the continued elaboration of trade networks, the use of shell-bead currency, and the appearance of more labor-intensive but effective technological innovations. The late prehistoric archaeology of the San Diego coast and foothills is characterized by the Cuyamaca Complex. The Cuyamaca Complex is described by the presence of steatite arrow shaft straighteners, steatite pendants, steatite comales (heating stones), Tizon Brownware pottery, ceramic figurines reminiscent of Hohokam styles, ceramic "Yuman bow pipes," ceramic rattles, miniature pottery, various cobble-based tools (e.g., scrapers, choppers, hammerstones), bone awls, manos and metates, mortars and pestles, and Desert Side-notched (more common) and Cottonwood Series projectile points (True 1970).

Other parts of northern San Diego County are also represented by the San Luis Rey Complex (Meighan 1954; True et al. 1974). First described by Meighan (1954) and based on excavations at Pala some 16 miles north-northeast of the study area, San Luis Rey I sites are associated with bedrock milling features and often have recognizable midden soils. The artifact assemblage includes manos and metates, Cottonwood Triangular, and less frequently Desert Side-notched type projectile points, drills, bifacially flaked knives, bone awls, occasional steatite arrow shaft straighteners, and bone and shell ornaments (True and Waugh 1981:87). The Cottonwood Triangular and Desert Side-notched points are both smaller than earlier types, suggesting the introduction of bow-and-arrow technology into the region.

San Luis Rey II consists of the same assemblage with the addition of Tizon Brownware ceramics, red and black pictographs, cremation remains in urns, and historic materials such as glass beads and metal objects. True (1966) demonstrated that the San Luis Rey Complex almost certainly represents the ancestors of the Luiseño.

Meighan argued that ceramics, probably introduced into north San Diego County from the south, appeared around 1750 Common Era (C.E.) and were a product of indigenous diffusion that appeared at about the same time or slightly earlier than the Spanish arrival. In contrast, True et al. (1974) suggested that pottery may have appeared as early as 1200 to 1600 C.E. Later, Griset (1996) obtained 22 accelerator mass spectrometry dates from residue on pottery sherds, and she reviewed and recalibrated a number of others. Griset found four dates earlier than 800 C.E. The earliest pottery date in San Diego County according to Griset's study was from Ystagua at 549 C.E. (1996:251-253). However, Griset's data suggest that pottery was not common in San Diego County until about 1400 C.E. (1996:262). The earliest date for Tizon Brownware in the San Diego region is not long after the advent of Lower Colorado Buff Ware, which was dated as early as 430 C.E. in the vicinity of Blythe (Hildebrand 2003:258-259).

3.4 Ethnohistory

The study area falls along the border of the Luiseño and Kumeyaay tribal territories (ASM Affiliates, Inc. 2014), which can be described as a line following Agua Hedionda Creek, extending northeasterly inland towards Lake Henshaw, north into Riverside County, and west through San Juan Capistrano to the coast (Bean and Shipek 1978). The Kumeyaay historically occupied the area south of Agua Hedionda into what is now Baja California, Mexico, and east into the Imperial Valley. Spanish explorers and missionaries noted that this geopolitical boundary was not static but rather fluid and dynamic (Luomala 1978:593). Because of this fluidity, the San Marcos area could have been inhabited by either the Luiseño or the Kumeyaay during the late Prehistoric and Ethnohistoric periods (ASM Affiliates, Inc. 2014). Work by Gallegos (Gallegos et al. 2002) and Comeau (Comeau et al. 2012) has attributed nearby archaeological resources to the Luiseño. This evidence supports Sparkman's (1908) attribution of the area to the Luiseños.

The Luiseño are the most southwesterly of the Shoshonean or Uto-Aztecan speakers. Historically, the Luiseño social structure was the clan triblet. The triblet was composed of patrilineally related people who were politically and economically autonomous from neighboring triblets. Unlike other Takic-speaking tribes that surrounded them, the Luiseño do not appear to have been organized into exogamous moieties but may have been loosely divided into mountain-oriented groups and ocean-oriented groups (Bean and Shipek 1978). One or more clans would have resided together in a village (Oxendine 1980). A hereditary village chief held a position that controlled economic, religious, and warfare powers (Bean and Shipek 1978). The chief had an assistant and an advisory council of shamans and ritual specialists. These positions were also hereditary, with successors being selected from the advisor's lineage.

Luiseño settlement systems have been carefully reconstructed on the basis of extensive ethnographic and ethnohistoric research (Bean and Shipek 1978; Kroeber 1925; Sparkman 1908; Strong 1929; White 1963). A Luiseño clan controlled one, or possibly more, specified territories, called rancherias. White (1963) suggests that the average inland rancheria had a territory of approximately 30 square miles. He suggested that the Luiseño settlement system consisted of a series of villages or rancherias located on terraces above a valley bottom watercourse (e.g., the San Luis Rey River). Villages were usually located in defensible locations in sheltered canyons or coves, or on the sides of slopes in warm thermal zones, near reliable water sources. The rancheria owned territory in a contiguous strip leading from the valley bottom to upland areas. This vertical pattern of rancheria territory facilitated gathering plant foods throughout the year. In early spring, tubers and berries first ripened along the watercourse below the rancheria. As spring turned to summer, chaparral plants near the rancheria became ripe. Later, those at a higher elevation above the rancheria ripened. In fall, people moved temporarily to higher elevations (e.g., Palomar Mountain) for the acorn harvest (White 1963).

A wide variety of plants growing in the various biotic communities between the coast and mountains were utilized by the Luiseño, including acorns, annual grasses, seeds, yucca, sage, chia, lemonade berry, manzanita, and other wild greens and fruits (Kroeber 1925) These resources become available at different times of the year, prompting moves to different campsites. In addition to plant-associated moves, trips to coastal camps to exploit marine resources such as shellfish, fish, and marine mammals would take place.

According to most ethnographic accounts, acorns were considered the most important food source (Bean and Shipek 1978). Since acorns mature at differing rates between groves, and even within individual groves, movement from place to place would have been necessary to be able to effectively harvest the annual acorn crop. Acorns could be harvested in one of two ways, either gathered from the ground after they had fallen or knocked off the tree with long sticks. After harvesting, acorns could either be processed into meal or stored for winter. Acorns had to be dry to be stored to prevent spoilage. Acorns to be processed were first shelled, then worked lightly with a pestle, and winnowed to remove the thin seed covering. Next, acorns were pounded to a fine flower and leached to remove the tannins. After this, acorn flour was ready to be cooked.

Baskets, both coiled and twined, were used in gathering, preparation, and storage of food (Bean and Shipek 1978). Basket size and shape depended on its use. Pottery vessels were used for cooking and storage. Pottery was made using the paddle and anvil technique and was seldom decorated (Bean and Shipek 1978). Nets and pouches made of cordage and animal skins were used for carrying food and tools.

Animal resources used by the Luiseño included most of the mammals occurring in their territory, except for predator animals and tree squirrels (Bean and Shipek 1978). Reptiles were also avoided as a food source. Birds hunted included quail, ducks, and doves. Larger animals were hunted with bow and arrow, while smaller game was caught using nets, deadfalls, slings, and throwing sticks. Game drives were also used for hunting rabbits and deer. Coastal marine animals exploited included sea mammals, fish, crustaceans, and mollusks (Bean and Shipek 1978). Basketry fish traps, seines, dip nets, bone, and shell hooks were used. Dugout and light balsa canoes were used for near-shore ocean fishing (Bean and Shipek 1978).

3.5 Spanish Period

The Spanish Period in Alta California (1769–1821) represents a time of European exploration and settlement. Military and religious contingents established the San Diego Presidio and the San Diego Mission in 1769, San Carlos Borromeo (Carmel) in 1770, and San Gabriel Arcangel in 1771. The opening of the mission system created the need to link Alta California with Sonora, Mexico. Juan Bautista de Anza of Tubac was commissioned to open up a road across the Colorado Desert to San Gabriel and on to Monterey. Mission San Luis Rey de Francia, the closest mission to the project, was founded on June 13, 1798, by Padre Fermin Lasuén. Two sub-missions, San Antonio de Pala Asistencia and Las Flores Estancia, were established in the early 1800s to support Mission San Luis Rey. The project is on the western end of Los Vallecitos de San Marcos Rancho, which was run by Mission San Luis Rey for cattle grazing.

The Spanish mission system used forced Native American labor to produce goods and provide services needed for European settlement. The mission system also introduced horses, cattle, sheep, and agricultural goods and implements as well as new construction methods and architectural styles. Also, with the arrival of the Spanish came devastating epidemics and very high death rates. According to available mission records, the worst year was 1806 when a measles epidemic spread through southern California. An estimated 33.5 percent of the Indian population along the coast died (Cook 1976:424).

3.6 Mexican Period

The Mexican Period (1821–1848) retained many of the Spanish institutions and laws. While Spanish and Mexican settlement was focused on coastal Alta California, exploration of inland areas continued, often during the course of pursuing neophytes that had run away from the missions. In 1824, Santiago Arguello, an officer of the San Diego Presidio "discovered" San Felipe Valley, which opened the route through present day Warner Springs and Riverside and on to the San Gabriel Mission. This route, which became known as the Sonora Road, soon became the official Mexican mail route (Gudde and Bright 2004; Lawton 1976:58).

The missions were secularized in 1834, opening vast tracts of former mission lands for private use and settlement. Los Vallecitos de San Marcos Rancho was granted to Don José Maria Alvarado in 1834 (Pourade 1969). Cattle ranching dominated the southern California economy, and the hide and tallow trade with New England merchant ships increased during the early part of the Mexican Period. Native American communities continued to decline, particularly those close to the coast. However, some Native Americans found jobs as *vaqueros*, laborers, gardeners, and housekeepers (Rolle 1998:57).

3.7 American Period

The signing of the treaty of Guadalupe Hidalgo in 1848, which signaled the end of the Mexican–American War, gave Alta California, the northern three-quarters of Arizona, New Mexico, a greatly enlarged Texas, and southern parts of Colorado, Nevada, and Utah to the United States (Rolle 1998:91). The treaty guaranteed citizenship to former Mexican citizens if they chose to stay in the new lands of the United States and it promised to respect their property. Native Americans had been granted Mexican citizenship in 1821, but the Americans never recognized their legal claims to U.S. citizenship, to property rights, or to other civil rights. In 1850, California was admitted to the Union as a free state (Phillips 1996:60-61).

On January 24, 1848, gold was discovered by John W. Marshall at Sutter's Fort in the central Sierra Nevada foothills. Sutter and Marshall did their best to keep it a secret, but the news of the discovery was published on March 15 in the *San Francisco Californian* newspaper. The subsequent Gold Rush launched an immigrant tide, which engulfed many of the Spanish and Mexican cultural traditions and eliminated many remaining vestiges of Native American culture. Many Mexican *ranchos* were overrun by forty-niners or dissolved in land claim disputes (Rolle 1998). Native American *Rancherias* were supposedly recognized by the American government in the terms of the Treaty of Guadalupe Hidalgo but not in reality.

The homestead system and the railroad encouraged American settlement in California after the Civil War, but settlement was slow in southern California. Most communities and ranches in northern San Diego and southern Riverside counties were not established until the land booms of the 1880s following completion of the Santa Fe and Southern Pacific railroads linking San Diego, Riverside, and San Bernardino with the East.

3.8 City of San Marcos

By the late 1850s, part of Los Vallecitos de San Marcos had been sold to Cave Couts, who primarily used the parcels to raise livestock. The remainder of the grant, sold to Lorenzo Soto by Jose Alvarado's widow, Lugarda Osuna, was patented by the U.S. Land Commission in 1883 (Carrol 1975:40). Major Gustavus French Merriam soon after established the first permanent European settlement in the North Twin Oaks Valley. On the 160-acre homestead, Merriam began wine and honey production (City of San Marcos 2010).

Not long after Major Merriam's settlement, German and Dutch immigrants began moving into the area in the early 1880s. By 1883, John H. Barham founded the first town in the area, just a few miles south of the Merriam's settlement. Named "Barham Township," the new town site had a post office, a blacksmith, a feed store, and a weekly newspaper by 1884. The San Marcos Land Company purchased nearly all the San Marcos land formerly owned by the Couts family in 1887, dividing the land into planned community tracts, establishing the town of San Marcos (City of San Marcos 2010). The arrival of the Santa Fe Railroad brought more people to the San Marcos area, but its siting outside the town forced the community to move the town center to present-day Mission Road and Pico Avenue. By the mid-1900s, dairies and poultry production became critical to the area's economic development (City of San Marcos 2010).

San Marcos saw another period of rapid growth after 1956 when it established a water connection with the Colorado River water supply. With more water came more opportunities for small businesses. Through the 1960s, the city slowly gained new residents but by the 1970s, San Marcos became the third fastest-growing city in the state with a population of 17,479. During the 1980s, San Marcos almost doubled its population to 33,800. Growth has continued to boom in San Marcos, bringing the city's population to 96,620 based on a 2024 California demographics report (Cubit Planning 2024).

4.0 Background Research

4.1 Records Search

RECON requested a records search at the South Coastal Information Center, San Diego State University, which is a member of the California Historical Resources Information System. The search radius was one mile. No prehistoric or historic cultural resources are recorded on or adjacent to the project area. A total of 31 cultural resources has been documented within one mile of the project boundaries (Confidential Attachment 1; Table 1), including 9 prehistoric period resources and 22 historic period resources. In addition, there are 19 historic addresses listed within the one-mile search radius. A summary of the available site data appears in Table 1.

Table 1 Cultural Resources within One Mile of the Project				
Primary #	Trinomial	Age	Site Type	Recording Events
P-37-005584	CA-SDI-005584	Prehistoric	Lithic scatter; Bedrock milling feature	1977 (Randy Franklin)
P-37-005633	CA-SDI-005633	Prehistoric	Lithic scatter; Ceramic scatter; Bedrock milling feature; Burials; Habitation debris; Other-shell	1977 (Randy Franklin); 2002, 2007 (Delman James, Rich Bark, Brian Glenn, Jerry Sabio, Ted Cooley, Ogden Environmental Services, Inc.)
P-37-008813	CA-SDI-008813	Prehistoric	Lithic scatter; Bedrock milling feature	1981 (Linda Roth)
P-37-008814	CA-SDI-008814	Historic	Trash scatter; Other-burned residence	1981 (Linda Roth)
P-37-008815	CA-SDI-008815	Prehistoric	Lithic scatter	1981 (Linda Roth)
P-37-011663	CA-SDI-011663	Prehistoric	Lithic scatter	1990 (Scott Crull, Ken Smith, Palomar College)
P-37-013009	CA-SDI-013009	Prehistoric	Lithic scatter; Bedrock milling feature	1993 (B. Glenn, C. Schultze, K. Collins, Ogden Environmental Services, Inc.)
P-37-018186		Historic	Single-family property	1999 (P.S. Preservation Services)
P-37-018187		Historic	One-to-three-story commercial building	1999 (P.S. Preservation Services)
P-37-018188		Historic	One-to-three-story commercial building	1999 (P.S. Preservation Services)
P-37-018189		Historic	Industrial building	1999 (P.S. Preservation Services)
P-37-018190		Historic	Industrial building	1999 (P.S. Preservation Services)
P-37-018191		Historic	Industrial building	1999 (P.S. Preservation Services)
P-37-018192		Historic	One-to-three-story commercial building; Single-family property	1999 (P.S. Preservation Services)
P-37-018193		Historic	Single-family property	1999 (P.S. Preservation Services)
P-37-018194		Historic	Single-family property	1999 (P.S. Preservation Services)
P-37-018195		Historic	Single-family property	1999 (P.S. Preservation Services)
P-37-018196		Historic	Single-family property	1999 (P.S. Preservation Services)
P-37-018197		Historic	Single-family property	1999 (P.S. Preservation Services)
P-37-018198		Historic	One-to-three-story commercial building	1999 (P.S. Preservation Services)
P-37-018199		Historic	Industrial building	1999 (P.S. Preservation Services)
P-37-018200		Historic	Single-family property	1999 (P.S. Preservation Services)
P-37-018201		Historic	Single-family property	1999 (P.S. Preservation Services)
P-37-018202		Historic	Single-family property	1999 (P.S. Preservation Services)
P-37-025309	CA-SDI-016787	Prehistoric	Lithic scatter	2003 (Gallegos & Associates)
P-37-030664	CA-SDI-019476	Prehistoric	Lithic scatter	1994 (R. Carrico, D. James, and A. Pigniolo, Ogden Environmental Services, Inc.); 2009 (CalTrans District 11)
P-37-033557		Historic	Roads; Highway	2013 (Larry Tift, ASM Affiliates, Inc.); 2015 (Kent Manchen, Matt DeCarlo, ASM Affiliates, Inc.); 2017 (Haley Chateene, PanGIS); 2017 (A. Foglia, K. Keckeisen, PanGIS, Inc.); 2018 (Sarah Stringer-Bowsher, ASM Affiliates, Inc.)
P-37-036868		Historic	Dam	2016 (Lucas Piek, ASM Affiliates)
P-37-036869		Historic	Dam	2016 (Lucas Piek, ASM Affiliates)

Table 1 Cultural Resources within One Mile of the Project				
Primary #	Trinomial	Age	Site Type	Recording Events
P-37-036870		Prehistoric	Isolate-flake	2016 (Lucas Piek, ASM Affiliates)
P-37-038298		Historic	Single-family property	2019 (Terri Jacquemain, CRM Tech)

Fifty-eight cultural resources studies have been conducted within one mile of the project. One cultural resource investigation appears to have included the project area: Archaeological Survey for the Proposed Widening of South Santa Fe Avenue, Vista, California, conducted in 1974.

4.2 Native American Heritage Commission and Tribal Response

A letter was sent to the Native American Heritage Commission (NAHC) in Sacramento on February 11, 2022, requesting a search of their Sacred Lands File. A response letter from the NAHC was received on March 29, 2022, indicating that their Sacred Lands File search results were positive. The NAHC also provided a list of Native American tribes who may have knowledge of cultural resources within the project APE and vicinity. During tribal consultation with the City, the Rincon Band of Luiseño Indians responded on June 28, 2022, agreeing with RECON's proposed measures found in Section 7.0. The NAHC correspondence and tribal response are in Attachment 1.

Tribal consultation was conducted again, subsequent to MND approval, for the modified project discussed herein. Because the project requires a GPA, the City conducted consultation in accordance with Senate Bill 18 (Government Code §65352.3), which mandates consultation with California Native American tribes for projects requiring a GPA. The City sent opportunity to consult letters on March 18, 2025. In response, the San Luis Rey Band of Mission Indians requested consultation on April 15, 2025; the Rincon Band of Luiseño Indians requested consultation on March 28, 2025; the Pechanga Band of Mission Indians requested consultation on April 23, 2025; and the Pala Band of Mission Indians requested consultation on March 24, 2025. The City sent this Cultural Resources Survey Report on November 14, 2025 to the tribes that requested consultation. As a result of consultation, the City has received a request to ensure that the City's current mitigation measures are incorporated into the environmental document. Detailed mitigation measures can be found in Addendum No. 1 to the Final Initial Study/Environmental Mitigated Negative Declaration for the Santa Fe Flores, LP Project, on file with the City. No additional consultation comments have been received.

Historic aerial photographs and topographic maps by Nationwide Environmental Title Research, LLC available online (at http://www.historicaerials.com) were inspected to identify any previous uses of the property. Aerial photographs from 1938, 1947, and 1953 show the project in agriculture. The 1938 and 1953 aerial photographs exhibit the parcels in fallow agriculture where the 1947 aerial photograph shows the central portion planted possibly with trees. All three aerials support that the agriculture originates from the adjacent property to the west which is supported by the 1949 topographic map. A 1964 aerial photograph shows building development in both parcels with ancillary structures supporting the northern parcel. Both parcels now have independent entrances to their properties off of what would be present-day South Santa Fe Avenue in the south and North Las Flores Drive to the north. The buildings and supporting structures on the parcel to the north were removed between 1989 and 1990. The building on the southern parcel was removed between 2005

and 2009. Also during this time, the present-day alignment for North Las Flores Drive was installed along with the generally west-facing bank of ornamental vegetation which dominates the eastern project boundary. A west-northwest by east-southeast alignment of K-Rails were added to the southern edge of the upper/northern terrace of the northern parcel between 2016 and 2018. Also installed in the upper/northern terrace during this time is an assumed drainage depression with stormwater manhole, culvert, and corrugated vertically placed metal pipe (Nationwide Environmental Title Research, LLC 2024).

5.0 Methods

A total of 2.21 acres of the project area was surveyed by RECON archaeologist Nathanial Yerka on March 10, 2022, accompanied by Native American monitor Vi'i Sialo'i of Saving Sacred Sites. Mr. Yerka surveyed an additional 0.37 acres of the northern portion of APN 217-161-17 in the southwest corner of the project area on November 12, 2024, accompanied by Native American monitor John Chavez of Saving Sacred Sites. Mr. Yerka served as project archaeologist and author and Carmen Zepeda-Herman served as principal investigator. Ms. Zepeda-Herman is a member of the Register of Professional Archaeologists and meets the Secretary of the Interior's Standards for Archaeology and Historic Preservation. The primary goal of this survey was to determine (1) if there are previously unrecorded cultural resources present, and if so, document the resources' locations and what they consist of, and (2) to update conditions of previously recorded cultural resources. The project area was inspected for evidence of archaeological materials such as debris, flaked and ground stone tools, ceramics, milling features, and human remains. Photographs were taken to document the environmental setting and general conditions.

6.0 Report of Findings

The survey did not identify any prehistoric artifacts or features, or any potentially significant historic artifacts or features.

The 2022 field inspection was conducted on foot, in conditions of high clouds, strong daylight, and cool temperatures. Survey transect intervals were approximately seven meters, spaced across the property. The project area is terraced into three generally flat steps with steep south-southwest-facing slopes. The entire surface of both parcels is disturbed. The southern parcel has a high amount of import gravel that links the area as a possible supporting parking area to the business adjacent to the west, with entry/exit to both the business improved parking area, as well as North Las Flores Drive (Photograph 1). Imported topping mulch is placed along a shallow berm that abuts the sidewalk of South Santa Fe Avenue and swings northeast to a manufactured slope with irrigated ornamental vegetation that supports Las Flores Drive. Near the top of the first/lower terrace are two granite imported boulders (Photograph 2). Near the eastern manufactured bank is an installed concrete stormwater culvert. At the southern edge of the second/upper terrace is a west-northwest by east-southeast alignment of K-Rails (Photograph 3). Also on this terrace is a central manufactured depression that is assumed to aid for drainage with stormwater manhole, culvert, and corrugated vertically placed metal pipe (Photograph 4). A significant amount of rodent disturbance occurs along the western boundary; back dirt was checked for cultural material. There is current project area ground surface disturbance in the form of off-highway vehicle and bicycle

PHOTOGRAPH 1
Overview of Project Area from the Southeast Corner, Looking North

PHOTOGRAPH 2
Two Granite Boulders Checked for Cultural Manipulation,
Looking North-Northeast

PHOTOGRAPH 3
Overview of Project Area from Northern Terrace on Eastern Boundary,
Looking Southwest

PHOTOGRAPH 4
Overview of Manufactured Drainage Area on Northern Terrace,
Looking South

activity (Photograph 5; see also Photographs 1 and 3). The project area also exhibits a fair amount of modern rubbish, mostly in the form of broken consumer bottle glass, as well as episodic dumping of furniture (Photograph 6) and dimensional lumber.

The 2024 field inspection was conducted on foot, in conditions of partly cloudy skies, strong daylight, and cool temperatures. The survey focused on the southwestern parcel, which comprises a portion of the lower two of three fully disturbed terraces and exhibits a singular commercial development with associated improved parking area adjacent to the southern boundary. The area to the east surrounding the commercial development exhibits a barrier made up of numerous placed imported boulders (Photograph 7). Several boulders were moved along the alignment of a recent cut-graded road accessing a geotechnical testing location on the middle terrace (Photographs 8 and 9). Other surface disturbances include modern rubbish, rubber tires, a high-visibility traffic barrel, and a five-gallon bucket.

7.0 Management Considerations

The key consideration for the management of cultural resources within the CEQA framework is their eligibility for inclusion on the California Register of Historical Resources (CRHR). A resource must satisfy one or more of the qualifying criteria in order to be considered eligible for listing. In order to be eligible for listing in the CRHR, a resource must satisfy at least one of the following four criteria:

1) It is associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States.

2) It is associated with the lives of persons important to local, California, or national history.

3) It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values.

4) It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

Cultural and historical resources eligible for listing in the CRHR must meet one of the criteria of significance described above and retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. For the purposes of eligibility for CRHR, integrity is defined as "the authenticity of an historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance" (California Office of Historic Preservation 2005:67).

No significant prehistoric or historic archaeological resources were observed during the survey of the project area. No prehistoric or historic cultural resources were mapped on or immediately adjacent to the property in the record search files. Therefore, the project will have no impact on known prehistoric or historic cultural resources. However, it appears probable that soil has been dumped on a significant portion of the parcel, obscuring the original ground. Also, the project is in an area of alluvial deposition adjacent to San Marcos Creek. Because of these factors, the possibility exists for buried prehistoric archaeological deposits on-site. RECON recommends that all

PHOTOGRAPH 5
Overview of Southern Terrace Showing a Portion of Off-Highway Vehicle Disturbance, Looking South

PHOTOGRAPH 6
Episodic Rubbish Dumping on Northern Terrace, Looking West-Northwest

PHOTOGRAPH 7
Boulder Barrier East of Commercial Development, Looking North-Northeast

PHOTOGRAPH 8
Overview of Recent Cut-Graded Road, Looking Northwest

PHOTOGRAPH 9
Overview of Recent Geotechnical Testing Location

ground-disturbing activities for the project be monitored by a qualified archaeological monitor and a Native American monitor representing the Luiseño community. If archaeological materials are identified during construction activities, work in the immediate area shall cease and an archaeologist meeting the City's Qualifications Standards for Archaeology must evaluate the find. If the discovery proves to be significant under CEQA, a data recovery program shall be implemented. If human remains are found, construction shall halt in the immediate area and procedures set forth in California Public Resources Code Section 5097.98 and State health and Safety Code Section 7050.5 shall be followed. After completion of monitoring, a final report with the monitoring methods and results shall be prepared and submitted to the City.

8.0 Certification and Project Staff

This report was prepared in compliance with the CEQA (Section 21083.2 of the Statutes and Appendix K of the Guidelines) and with policies and procedures of the City of San Marcos. To the best of my knowledge, the statements and information contained in this report are accurate.

Nathanial Yerka
Project Archaeologist/Author

Carmen Zepeda-Herman, M.A., RPA
Principal Investigator

The following individuals participated in the field tasks or preparation of this report.

Carmen Zepeda-Herman	Principal Investigator
Nathanial Yerka	Project Archaeologist/Author
Vi'i Sialo'i	Luiseño Native American Monitor
John Chavez	Luiseño Native American Monitor
Benjamin Arp	GIS Specialist
Jennifer Gutierrez	Production Specialist
Steven Gaughran	Production Specialist

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1964 *Cultural Change and Continuity on the San Diego Coast.* Unpublished Ph.D. dissertation, Department of Anthropology, University of California, Los Angeles.

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ATTACHMENT 1

Native American Heritage Commission and Tribal Response

NATIVE AMERICAN HERITAGE COMMISSION

CHAIRPERSON
Laura Miranda
Luiseño

VICE CHAIRPERSON
Reginald Pagaling
Chumash

PARLIAMENTARIAN
Russell Attebery
Karuk

SECRETARY
Sara Dutschke
Miwok

COMMISSIONER
William Mungary
Paiute/White Mountain Apache

COMMISSIONER
Isaac Bojorquez
Ohlone-Costanoan

COMMISSIONER
Buffy McQuillen
Yokayo Pomo, Yuki, Nomlaki

COMMISSIONER
Wayne Nelson
Luiseño

COMMISSIONER
Stanley Rodriguez
Kumeyaay

EXECUTIVE SECRETARY
Raymond C. Hitchcock
Miwok/Nisenan

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

March 29, 2022

Carmen Zepeda-Herman
RECON Environmental, Inc.

Via Email to: czepeda@reconenvironmental.com

Re: Santa Fe Flores Project, San Diego County

Dear Ms. Zepeda-Herman:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information submitted for the above referenced project. The results were positive. Please contact the Pechanga Band of Indians on the attached list for information. Please note that tribes do not always record their sacred sites in the SLF, nor are they required to do so. A SLF search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with a project's geographic area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites, such as the appropriate regional California Historical Research Information System (CHRIS) archaeological Information Center for the presence of recorded archaeological sites.

Attached is a list of Native American tribes who may also have knowledge of cultural resources in the project area. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. Please contact all of those listed; if they cannot supply information, they may recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call or email to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from tribes, please notify the NAHC. With your assistance, we can assure that our lists contain current information.

If you have any questions or need additional information, please contact me at my email address: Andrew.Green@nahc.ca.gov.

Sincerely,

Andrew Green

Andrew Green
Cultural Resources Analyst

Attachment

Native American Heritage Commission
Native American Contact List
San Diego County
3/29/2022

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

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

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

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

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

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

Inaja-Cosmit Band of Indians
Rebecca Osuna, Chairperson
2005 S. Escondido Blvd. — Diegueno
Escondido, CA, 92025
Phone: (760) 737 - 7628
Fax: (760) 747-8568

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

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

Kwaaymii Laguna Band of Mission Indians
Carmen Lucas,
P.O. Box 775 — Kwaaymii
Pine Valley, CA, 91962 — Diegueno
Phone: (619) 709 - 4207

La Jolla Band of Luiseno Indians
Norma Contreras, Chairperson
22000 Highway 76 — Luiseno
Pauma Valley, CA, 92061
Phone: (760) 742 - 3771

La Posta Band of Diegueno Mission Indians
Javaughn Miller, Tribal Administrator
8 Crestwood Road — Diegueno
Boulevard, CA, 91905
Phone: (619) 478 - 2113
Fax: (619) 478-2125
jmiller@LPtribe.net

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

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Santa Fe Flores Project, San Diego County.

La Posta Band of Diegueno Mission Indians
Gwendolyn Parada, Chairperson
8 Crestwood Road — Diegueno
Boulevard, CA, 91905
Phone: (619) 478 - 2113
Fax: (619) 478-2125
LP13boots@aol.com

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

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

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

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

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

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

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

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

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

San Luis Rey Band of Mission Indians
1889 Sunset Drive — Luiseno
Vista, CA, 92081
Phone: (760) 724 - 8505
Fax: (760) 724-2172
cjmojado@slrmissionindians.org

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This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Santa Fe Flores Project, San Diego County.

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

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

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

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

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

Sycuan Band of the Kumeyaay Nation
Kristie Orosco, Kumeyaay Resource Specialist
1 Kwaaypaay Court — Kumeyaay
El Cajon, CA, 92019
Phone: (619) 445 - 6917

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

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

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Rincon Band of Luiseño Indians
CULTURAL RESOURCES DEPARTMENT

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

June 28, 2022

Sent via email: JFarace@san-marcos.net
Mr. Joseph Farace
City of San Marcos
1 Civic Center Drive
San Marcos, CA 92069

Re: GPA21-0008 Santa Fe/Los Flores

Dear Mr. Farace,

This letter is written on behalf of the Rincon Band of Luiseño Indians ("Rincon Band" or "Tribe"), a federally recognized Indian tribe and sovereign government. Thank you for consulting with the Tribe on the above-mentioned project and providing us with project-related documents.

The Rincon Band of Luiseño Indians Tribal Historic Preservation Office (THPO) has reviewed the provided documents and is in agreement with the proposed measures in the RECON Cultural Resources Assessment, which include archaeological and tribal monitoring, a monitoring report, and protocols for discovery of cultural material and human remains. We understand that other Tribes potentially have knowledge particular to this project site and may request additional measures. Please note that the Rincon Band supports all efforts to completely avoid cultural resources as preferred mitigation. We have no further comments regarding this project and can conclude consultation at this time.

We do request that the Rincon Band be notified of any changes in project plans. In addition, we request a copy of the final monitoring report, when available and ask that Rincon be afforded the opportunity to monitor the ground disturbances associated with this project.

The Rincon Band reserves its right to continue to fully participate in the environmental review process and to review and submit additional information during the public review process. If you have additional questions or concerns, please do not hesitate to contact our office at your convenience at (760) 749 1092 ext. 323 or via electronic mail at cmadrigal@rincon-nsn.gov. Thank you for the opportunity to protect our cultural heritage.

Sincerely,

Cheryl Madrigal
Tribal Historic Preservation Officer
Cultural Resources Manager

Bo Mazzetti, Chairman | Tishmall Turner, Vice Chair | Laurie E. Gonzalez, Council Member | John Constantino, Council Member | Joseph Linton, Council Member

CONFIDENTIAL ATTACHMENT

Not for Public Review