

Comment Letter O7



To: Kristin Blackson
 Planning Consultant
 City of Escondido

August 18, 2017

Re: San Pasqual Economic Development Agency's Comment on the Villages - Escondido Country Club Project

First, we would like to thank the Planning Department of the City of Escondido for extending the comment period on this Draft Environmental Report.

Having stated that we are asking that the City of Escondido take into consideration that there will always be a conflict regarding site significance thus being eligible for listing on the National Register of Historic Places and/or California Register of Historic Places. The integrity and the evaluation of mitigated effects on sites to confirm their status as Sacred Sites or Culturally Significant Sites, therefore eligibility will always have a different meaning to Lead Agencies, Cultural Resource Companies (CRM's) and Developers than they do to the San Pasqual Band of Mission Indians, (the Band). While not unmanageable, the conflict will always be present. That is why we are asking Lead agencies, Developers and CRM Co.'s to approach consultation with the understanding that any site, including isolates found in our territory has Cultural Significance to the Band therefore a different meaning. We are asking them to understand that the Bands first choice for the treatment of our cultural heritage and ancestral remains is always going to be avoidance. We also understand that avoidance will not always be the result. We do believe that the consultation process can be beneficial to both parties when department leads to mutual respect. It is our belief that all the sites represent our Cultural Heritage and we do not acknowledge or understand the time span disconnects between the sites in our territory. We hold that all the sites in our territory are part of our Cultural Heritage and therefore significant. As stated above we have a different concept of significance than those as outlined in California Environmental Quality Act (CEQA), thus, our dilemma (a solution requiring a choice between equally undesirable alternatives). We hope this helps you understand the predicament that the consultation process places us in.

Regarding the Villages- Escondido Country Club Project our first choice is for total avoidance of SDI-12,998 and SDI-12,999 beyond that we are open to a discussion regarding the mitigation process and any suggestions that the City of Escondido Planning Department and or Developer would like to make. If the project is approved we will be asking for a Treatment Agreement with the developer that includes monitors to be present during all ground disturbing activities including offsite work. Will request that we have control over the treatment of our Cultural Artifacts, and the treatment of human remains (if uncovered). If we cannot reach an agreement on the avoidance SD-21,998 and SDI-21,999 the treatment agreement will include a mutual understanding of how the 2 sites will be treated.

Sincerely,

 Hellyaachwehay Quisquis
 President
 San Pasqual Economic Development Agency

P.O. Box 10 - 28000 Via Vista Road
 Valley Center - California - 92082

O7-1

O7-2

O7-3

Response to Comment Letter O7

San Pasqual Economic Development Agency (SPEDA)
 Hellyaachwehay Quisquis
 August 18, 2017

O7-1 The commenter describes the San Pasqual Band of Mission Indians' position on cultural significance and strong position for avoidance of such significant cultural heritage and ancestral remains. The comment also outlines their definition and concept of significance as opposed to the California Environmental Quality Act. The City of Escondido (City) acknowledges the comment, and notes that it does not raise an issue related to the adequacy of a specific section or analysis of the Environmental Impact Report (EIR). The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.

O7-2 The comment expresses the commenter's preference for total avoidance of sites SDI-12,998 and SDI-12,999. As described in EIR Section 2.3, Cultural Resources, the sites were tested and found to be lacking significant subsurface deposits or further research potential and were determined to be less than significant. The City will continue to work with the San Pasqual Band of Mission Indians during the consultation process to ensure monitoring further protects any additional

	<p>inadvertent resources on the site. The City acknowledges the preference to avoid those sites. The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.</p> <p>O7-3 The comment requests that, if the Project is approved, a treatment agreement with the developer that includes monitors present during all ground-disturbing activities, including off-site work, be considered. The comment requests that the San Pasqual Band of Mission Indians has control over the treatment of cultural artifacts and the treatment of human remains (if uncovered). The City acknowledges the comment, and notes that it does not raise an issue related to the adequacy of a specific section or analysis of the EIR. The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final decision on the Project.</p>
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