

PHASE I CULTURAL RESOURCE SURVEY FOR THE EMERALD HILLS PROJECT

CITY OF SAN DIEGO

**PRJ-1107880
APN 543-340-02**

Submitted to:

**City of San Diego
Development Services Department
1222 First Avenue, MS 501
San Diego, California 92101**

Prepared for:

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November 6, 2023; Revised January 31, 2024



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Archaeological Database Information

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USGS Quadrangle: *National City, California (7.5 minute)*

Study Area: 31.18 acres (gross) (APN 543-340-02)

Key Words: Phase I survey; negative; City of San Diego; monitoring not recommended.

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I. PROJECT DESCRIPTION AND LOCATION

As requested by the City of San Diego, BFS A Environmental Services, a Perennial Company (BFS A), conducted a Phase I archaeological records search review and pedestrian survey of the 31.18-acre (gross) Emerald Hills Project located northwest of the intersection of Old Memory Lane and 60th Street in the Emerald Hills neighborhood of the city of San Diego, California (Assessor's Parcel Number [APN] 543-340-02). Specifically, the property is situated within the unsectioned Rancho Mission Land Grant at Township 17 South, Range 2 West (projected), as shown on the U.S. Geological Survey (USGS) *National City, California* (7.5-minute) topographic quadrangle (Figures 1 through 3). The project proposes to develop the 31.18-acre parcel for a total of 123 single-family residences (Figure 4), and the cultural resources assessment focused upon the potential of the property to contain significant historical and archaeological resources that could represent a constraint to the development of the property.

The records search was compiled from information gathered at the South Coastal Information Center (SCIC) at San Diego State University (SDSU) and the BFS A archives to determine if any recorded cultural resources are present within the project. The SCIC records search identified the presence of three cultural resources and three historic addresses recorded within a one-half-mile radius of the project. No recorded cultural resources were identified within the current Area of Potential Effect (APE). However, based on reports on file with the SCIC, the property does include the historic transmitter building and two transmission towers of the KFSD/KOGO radio station (U.S. Department of Homeland Security 2011). The towers and transmitter building were previously evaluated as eligible for listing on the National Register of Historic Places (NRHP) due to their historic significance under Criteria A and B; however, this evaluation was deemed incomplete by the United States Department of Homeland Security (U.S. Department of Homeland Security 2011).

The field survey took place on October 27, 2022. No prehistoric resources were identified within the project; however, the property does still contain the historic transmitter building and two transmission towers of the KFSD/KOGO radio station. As such, additional evaluation of the structures is required prior to their planned removal.

II. SETTING

The project setting includes both physical and biological contexts of the proposed project, as well as the cultural setting of prehistoric and historic human activities in the general area.

Natural Setting

The project APE is situated in the western portion of the Peninsular Ranges geomorphic province of southern California. Vegetation within the project is limited to introduced grasses with pockets of sage brush and a few eucalyptus trees, as much of the area has been previously developed.

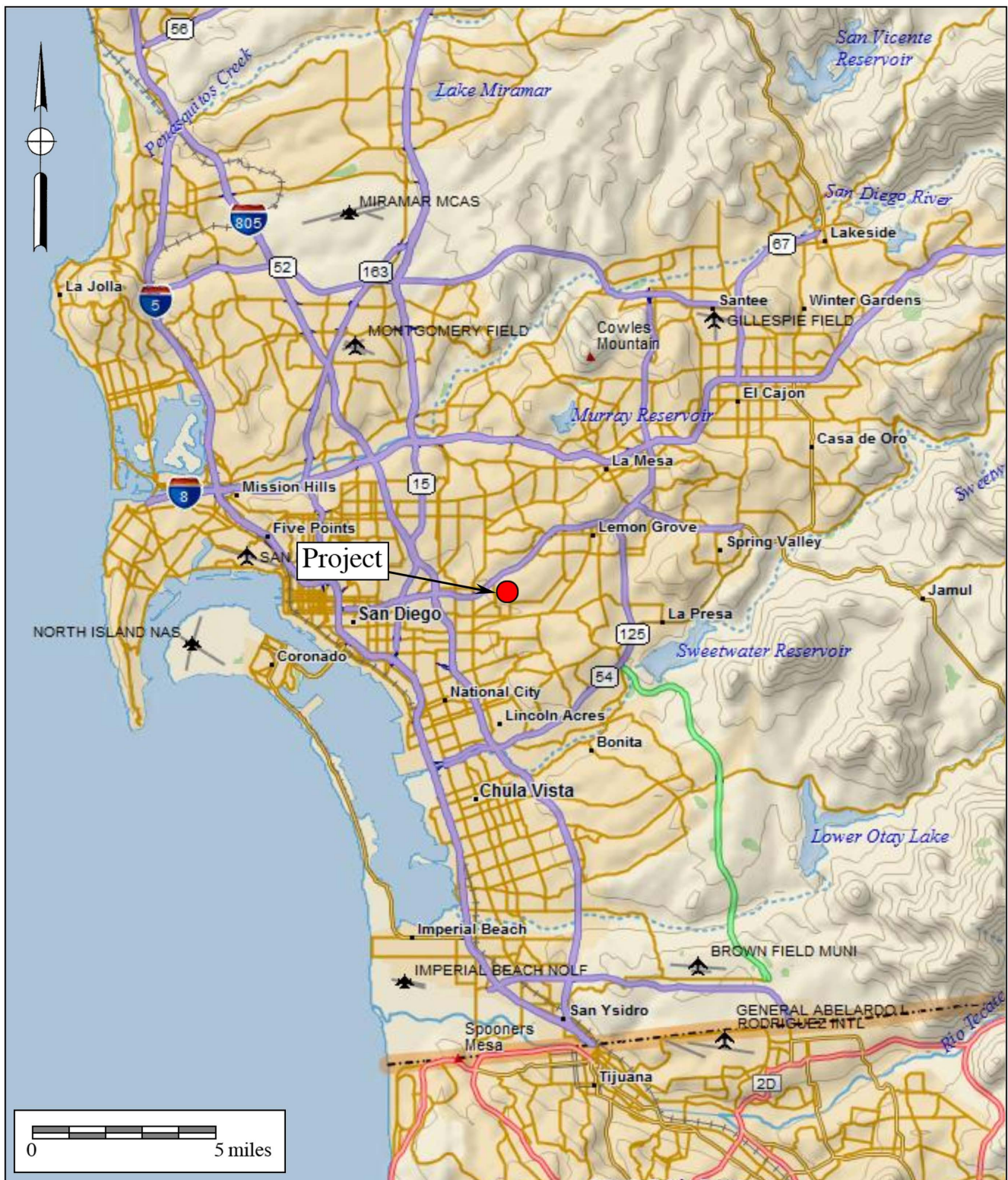


Figure 1
General Location Map
 The Emerald Hills Project
 DeLorme (1:250,000 series)

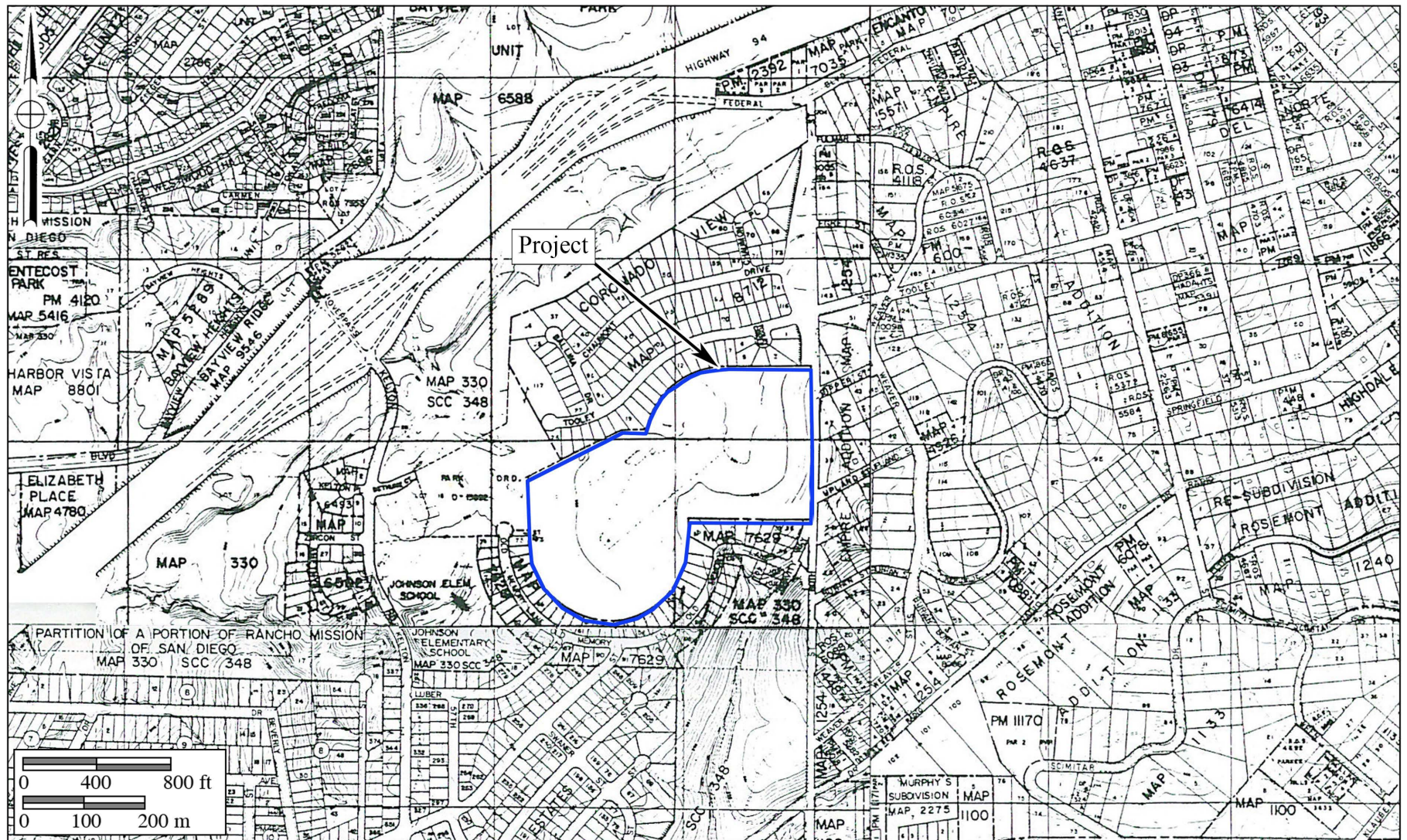


Figure 3
Project Location Map
The Emerald Hills Project

Shown on The City of San Diego 1" to 800' Scale Engineering Map

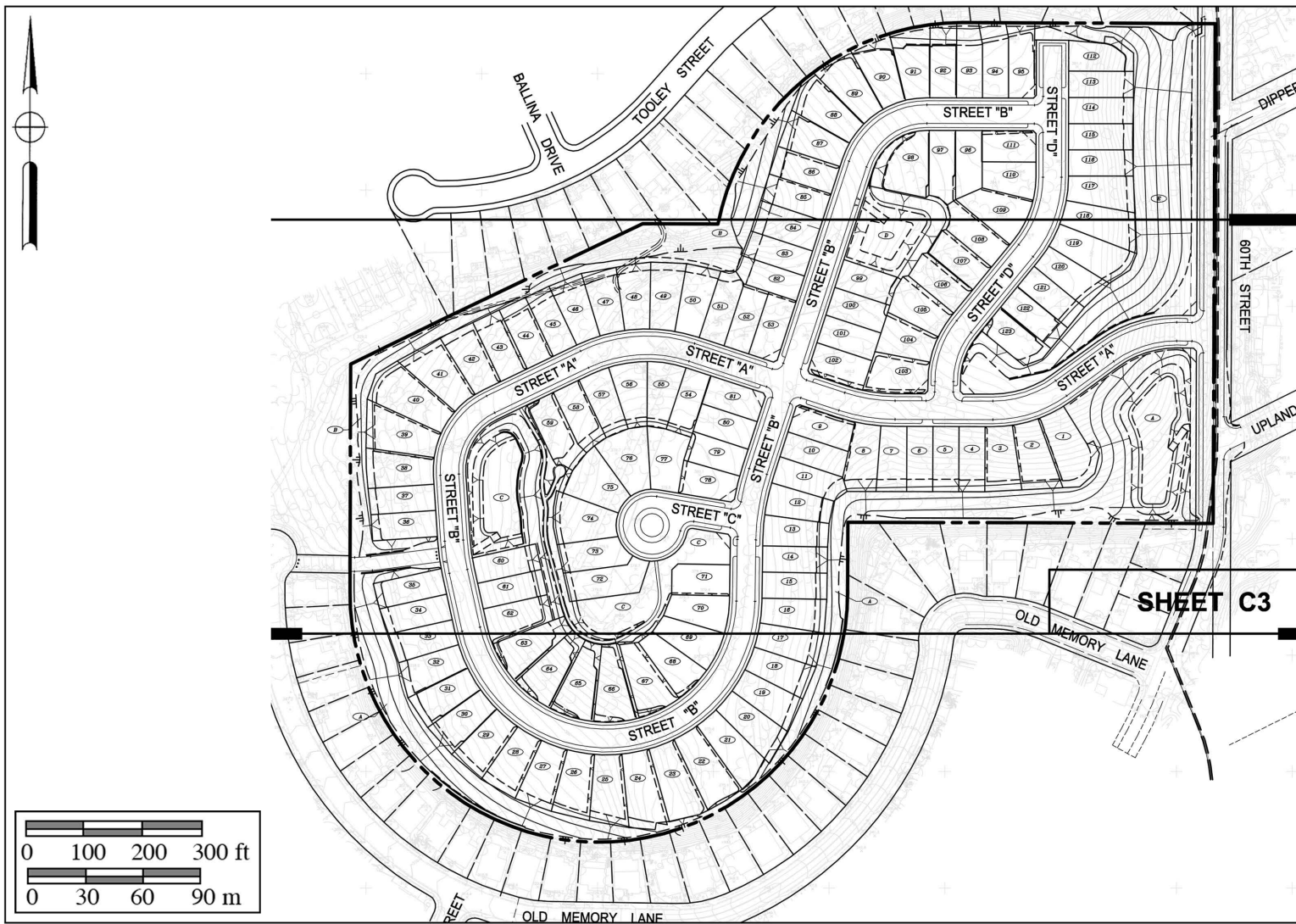


Figure 4
Project Development Map
 The Emerald Hills Project



BFS Environmental Services
 A Perennial Company

The majority of the APE is currently vacant, except for the radio transmission towers and associated transmitter building. Elevations within the project range from approximately 315 feet above mean sea level (AMSL) to approximately 375 feet AMSL. Geologically, the project lies just east of a mapped strand of the La Nación fault, and is underlain by formational sediments of the middle Eocene (42.8-million-year-old) Mission Valley Formation and upper Pleistocene to Holocene (less than 50,000 years old to present) undifferentiated alluvium and slopewash (Kennedy and Tan 1977). The majority of the area surrounding the project APE has been developed for single-family residences (Plate 1).



Plate 1: View from the southeast corner of the property, showing nearby development and vegetation conditions, facing east.

Cultural Setting

The cultures that have been identified in the general vicinity of the project consist of a possible Paleo Indian manifestation of the San Dieguito Complex, the Archaic and Early Milling Stone horizons represented by the La Jolla Complex, and the Late Prehistoric Kumeyaay culture. The area was used for ranching and farming following the Hispanic intrusion into the region and continuing through the historic period. A brief discussion of the cultural elements in the project is provided in the following sections.

Paleoenvironment

Because of the close relationship between prehistoric settlement and subsistence patterns and the environment, it is necessary to understand the setting in which these systems operated. At

the end of the final period of glaciation, approximately 11,000 to 10,000 years before the present (YBP), the sea level was considerably lower than it is now; the coastline at that time would have been between two and two and a half miles west of its present location (Smith and Moriarty 1985). At approximately 7,000 YBP, the sea level rose rapidly, filling in many coastal canyons that had been dry during the glacial period. The period between 7,000 and 4,000 YBP was characterized by conditions that were drier and warmer than they were previously, followed by a cooler, moister environment (Robbins-Wade 1990). Changes in sea level and coastal topography are often manifested in archaeological sites through the types of shellfish that were utilized by prehistoric groups. Different species of shellfish prefer certain types of environments, and dated sites that contain shellfish remains reflect the setting that was exploited by the prehistoric occupants.

Unfortunately, pollen studies have not been conducted for this section of San Diego; however, studies in other areas of southern California, such as Santa Barbara, indicate that the coastal plains supported a pine forest between approximately 12,000 and 8,000 YBP (Robbins-Wade 1990). After 8,000 YBP, this environment was replaced by more open habitats, which supported oak and non-arboreal communities. The coastal sage scrub and chaparral environments of today appear to have become dominant after 2,200 YBP (Robbins-Wade 1990).

Prehistory

In general, the prehistoric record of San Diego County has been documented in many reports and studies, several of which represent the earliest scientific works concerning the recognition and interpretation of the archaeological manifestations present in this region. Geographer Malcolm Rogers initiated the recordation of sites in the area during the 1920s and 1930s, using his field notes to construct the first cultural sequences based upon artifact assemblages and stratigraphy (Rogers 1966). Subsequent scholars expanded the information gathered by Rogers and offered more academic interpretations of the prehistoric record. Moriarty (1966, 1967, 1969), Warren (1964, 1966), and True (1958, 1966) all produced seminal works that critically defined the various prehistoric cultural phenomena present in this region (Moratto 1984). Additional studies have sought to refine these earlier works to a greater extent (Cardenas 1986; Moratto 1984; Moriarty 1966, 1967; True 1970, 1980, 1986; True and Beemer 1982; True and Pankey 1985; Waugh 1986). In sharp contrast, the current trend in San Diego prehistory has also resulted in a revisionist group that rejects the established cultural historical sequence for San Diego. This revisionist group (Warren et al. 1998) has replaced the concepts of La Jolla, San Dieguito, and all of their other manifestations with an extensive, all-encompassing, chronologically undifferentiated cultural unit that ranges from the initial occupation of southern California to around A.D. 1000 (Bull 1983, 1987; Ezell 1983, 1987; Gallegos 1987; Kyle et al. 1990; Stropes 2007). For the present study, the prehistory of the region is divided into four major periods: Early Man, Paleo Indian, Early Archaic, and Late Prehistoric.

Early Man Period (Prior to 8500 B.C.)

At the present time, there has been no concrete archaeological evidence to support the

occupation of San Diego County prior to 10,500 YBP. Some archaeologists, such as Carter (1957, 1980) and Minshall (1976), have been proponents of Native American occupation of the region as early as 100,000 YBP. However, their evidence for such claims is sparse at best and has lost much support over the years as more precise dating techniques have become available for skeletal remains thought to represent early man in San Diego. In addition, many of the “artifacts” initially identified as products of early man in the region have since been rejected as natural products of geologic activity. Some of the local proposed Early Man Period sites include Texas Street, Mission Valley (San Diego River Valley), Del Mar, La Jolla, Buchanan Canyon, and Brown (Bada et al. 1974; Carter 1957, 1980; Minshall 1976, 1989; Moriarty and Minshall 1972; Reeves 1985; Reeves et al. 1986).

Paleo Indian Period (8500 to 6000 B.C.)

For the region, it is generally accepted that the earliest identifiable culture in the archaeological record is represented by the material remains of the Paleo Indian Period San Dieguito Complex. The San Dieguito Complex was thought to represent the remains of a group of people who occupied sites in this region between 10,500 and 8,000 YBP, and who were related to or contemporaneous with groups in the Great Basin. As of yet, no absolute dates have been forthcoming to support the great age attributed to this cultural phenomenon. The artifacts recovered from San Dieguito Complex sites duplicate the typology attributed to the Western Pluvial Lakes Tradition (Moratto 1984; Davis et al. 1969). These artifacts generally include scrapers, choppers, large bifaces, large projectile points, and few milling tools. Tools recovered from San Dieguito Complex sites, along with the general pattern of their site locations, led early researchers to believe that the people of the San Dieguito Complex were a wandering, hunting, and gathering society (Moriarty 1969; Rogers 1966).

The San Dieguito Complex is the least understood of the cultures that have inhabited the San Diego County region. This is due to an overall lack of stratigraphic information and/or datable materials recovered from sites identified as the San Dieguito Complex. Currently, controversy exists among researchers regarding the relationship of the San Dieguito Complex and the subsequent cultural manifestation in the area, the La Jolla Complex. Although, firm evidence has not been recovered to indicate whether the San Dieguito Complex “evolved” into the La Jolla Complex, the people of the La Jolla Complex moved into the area and assimilated with the people of the San Dieguito Complex, or the people of the San Dieguito Complex retreated from the area due to environmental or cultural pressures.

Early Archaic Period (6000 B.C. to A.D. 0)

Based upon evidence suggesting climatic shifts and archaeologically observable changes in subsistence strategies, a new cultural pattern is believed to have emerged in the San Diego region around 6000 B.C. This Archaic Period pattern is believed by archaeologists to have evolved from or replaced the San Dieguito Complex culture, resulting in a pattern referred to as the Encinitas Tradition. In San Diego, the Encinitas Tradition is thought to be represented by the coastal La

Jolla Complex and its inland manifestation, the Pauma Complex. The La Jolla Complex is best recognized for its pattern of shell middens, grinding tools closely associated with marine resources, and flexed burials (Shumway et al. 1961; Smith and Moriarty 1985). Increasing numbers of inland sites have been identified as dating to the Archaic Period, focusing upon terrestrial subsistence (Cardenas 1986; Smith 1996; Raven-Jennings and Smith 1999a, 1999b).

The tool typology of the La Jolla Complex displays a wide range of sophistication in the lithic manufacturing techniques used to create the tools found at their sites. Scrapers, the dominant flaked tool type, were created by either splitting cobbles or by finely flaking quarried material. Evidence suggests that after about 8,200 YBP, milling tools began to appear in La Jolla Complex sites. Inland sites of the Encinitas Tradition (Pauma Complex) exhibit a reduced quantity of marine-related food refuse and contain large quantities of milling tools and food bone. The lithic tool assemblage shifts slightly to encompass the procurement and processing of terrestrial resources, suggesting seasonal migration from the coast to the inland valleys (Smith 1996). At the present time, the transition from the Archaic Period to the Late Prehistoric Period is not well understood. Many questions remain concerning cultural transformation between periods, possibilities of ethnic replacement, and/or a possible hiatus from the western portion of the county.

Late Prehistoric Period (A.D. 0 to 1769)

The transition into the Late Prehistoric Period in the project area is primarily represented by a marked change in archaeological patterning known as the Yuman Tradition. This tradition is primarily represented by the Cuyamaca Complex, which is believed to be derived from the mountains of southern San Diego County. The people of the Cuyamaca Complex are considered as ancestral to the ethnohistoric Kumeyaay (Diegueño). Although several archaeologists consider the local Native American tribes to be latecomers, the traditional stories and histories that are orally passed down by the local Native American groups speak both presently and ethnographically to tribal presence in the region as being since the time of creation.

The Kumeyaay Native Americans were a seasonal hunting and gathering people with cultural elements that were very distinct from the people of the La Jolla Complex. Noted variations in material culture included cremation, the use of the bow and arrow, and adaptation to the use of the acorn as a main food staple (Moratto 1984). Along the coast, the Kumeyaay made use of marine resources by fishing and collecting shellfish for food. Game and seasonally available plant food resources (including acorns) were sources of nourishment for the Kumeyaay. By far, though, the most important food resource for these people was the acorn. The acorn represented a storable surplus, which in turn allowed for seasonal sedentism and its attendant expansion of social phenomena.

Firm evidence has not been recovered to indicate whether the people of the La Jolla Complex were present when the Kumeyaay Native Americans migrated into the coastal zone. However, stratigraphic information recovered from Site SDI-4609 in Sorrento Valley suggests a possible hiatus of 650 ± 100 years between the occupation of the coastal area by the La Jolla Complex ($1,730 \pm 75$ YBP is the youngest date for the La Jolla Complex inhabitants at SDI-4609)

and Late Prehistoric cultures (Smith and Moriarty 1983). More recently, a reevaluation of two prone burials at the Spindrift Site excavated by Moriarty (1965) and radiocarbon dates of a pre-ceramic phase of Yuman occupation near the San Diego suburb of Santee suggest a commingling of the latest La Jolla Complex inhabitants and the earliest Yuman inhabitants about 2,000 YBP (Kyle and Gallegos 1993).

History

Exploration Period (1530 to 1769)

The historic period around San Diego Bay began with the landing of Juan Rodríguez Cabrillo and his men in 1542 (Chapman 1925). Sixty years after the Cabrillo expeditions (1602 to 1603), Sebastián Vizcaíno made an extensive and thorough exploration of the Pacific coast. Although his voyage did not extend beyond the northern limits of the Cabrillo track, Vizcaíno had the most lasting effect on the nomenclature of the coast. Many of the names Vizcaíno gave to various locations throughout the region have survived to the present time, whereas nearly every one of Cabrillo's has faded from use. For example, Cabrillo gave the name "San Miguel" to the first port he stopped at in what is now the United States; 60 years later, Vizcaíno changed the port name to "San Diego" (Rolle 1969).

Spanish Colonial Period (1769 to 1821)

The Spanish occupation of the claimed territory of Alta California took place during the reign of King Carlos III of Spain (Engelhardt 1920). Jose de Gálvez, a powerful representative of the king in Mexico, conceived the plan to colonize Alta California and thereby secure the area for the Spanish Crown (Rolle 1969). The effort involved both a military and religious contingent, where the overall intent of establishing forts and missions was to gain control of the land and the native inhabitants through conversion. Actual colonization of the San Diego area began on July 16, 1769, when the first Spanish exploring party, commanded by Gaspar de Portolá (with Father Junípero Serra in charge of religious conversion of the native populations), arrived by the overland route to San Diego to secure California for the Spanish Crown (Palou 1926). The natural attraction of the harbor at San Diego and the establishment of a military presence in the area solidified the importance of San Diego to the Spanish colonization of the region and the growth of the civilian population. Missions were constructed from San Diego to as far north as San Francisco. The mission locations were based upon important territorial, military, and religious considerations. Grants of land were made to persons who applied, but many tracts reverted back to the government for lack of use. As an extension of territorial control by the Spanish Empire, each mission was placed so as to command as much territory and as large a population as possible. While primary access to California during the Spanish Period was by sea, the route of El Camino Real served as the land route for transportation, commercial, and military activities within the colony. This route was considered to be the most direct path between the missions (Rolle 1969; Caughey 1970). As increasing numbers of Spanish and Mexican peoples, as well as the later Americans during the Gold Rush, settled in the area, the Native American populations diminished as they were displaced

or decimated by disease (Carrico and Taylor 1983).

Mexican Period (1821 to 1846)

On September 16, 1810, the priest Father Miguel Hidalgo y Costilla started a revolt against Spanish rule. He and his untrained Native American followers fought against the Spanish, but his revolt was unsuccessful, and Father Hidalgo was executed. After this setback, Father José Morales led the revolutionaries, but he too failed and was executed. These two men are still symbols of Mexican liberty and patriotism. After the Mexican-born Spanish and the Catholic Church joined the Revolution, Spain was finally defeated in 1821. Mexican Independence Day is celebrated on September 16 of each year, signifying the anniversary of the start of Father Hidalgo's revolt. The revolution had repercussions in the northern territories, and by 1834, all of the mission lands had been removed from the control of the Franciscan Order under the Acts of Secularization. Without proper maintenance, the missions quickly began to disintegrate, and after 1836, missionaries ceased to make regular visits inland to minister to the needs of the Native Americans (Engelhardt 1920). Large tracts of land continued to be granted to persons who applied for them or who had gained favor with the Mexican government. Grants of land were also made to settle government debts and the Mexican government was called upon to reaffirm some older Spanish land grants shortly before the Mexican-American War of 1846 (Moyer 1969).

Anglo-American Period (1846 to Present)

California was invaded by United States troops during the Mexican-American War from 1846 to 1848. The acquisition of strategic Pacific ports and California land was one of the principal objectives of the war (Price 1967). At the time, the inhabitants of California were practically defenseless, and they quickly surrendered to the United States Navy in July of 1847 (Bancroft 1886).

The cattle ranchers of the "counties" of southern California prospered during the cattle boom of the early 1850s. They were able to "reap windfall profit ... pay taxes and lawyer's bills ... and generally live according to custom" (Pitt 1966). However, cattle ranching soon declined, contributing to the expansion of agriculture. With the passage of the "No Fence Act," San Diego's economy shifted from raising cattle to farming (Robinson 1948). The act allowed for the expansion of unfenced farms, which was crucial in an area where fencing material was practically unavailable. Five years after its passage, most of the arable lands in San Diego County had been patented as either ranchos or homesteads, and growing grain crops replaced raising cattle in many of the county's inland valleys (Blick 1976; Elliot 1883 [1965]).

By 1870, farmers had learned to dry farm and were coping with some of the peculiarities of San Diego County's climate (*San Diego Union* 1868; Van Dyke 1886). Between 1869 and 1871, the amount of cultivated acreage in the county rose from less than 5,000, to more than 20,000 acres (*San Diego Union* 1872). Of course, droughts continued to hinder the development of agriculture (Crouch 1915; *San Diego Union* 1870; Shipek 1977). Large-scale farming in San Diego County was limited by a lack of water and the small size of arable valleys. The small urban

population and poor roads also restricted commercial crop growing. Meanwhile, cattle continued to be grazed in parts of inland San Diego County. In the Otay Mesa area, for example, the “No Fence Act” had little effect on cattle farmers because ranches were spaced far apart and natural ridges kept the cattle out of nearby growing crops (Gordinier 1966).

During the first two decades of the twentieth century, the population of San Diego County continued to grow. The population of the inland county declined during the 1890s, but between 1900 and 1910, it rose by about 70 percent. The pioneering efforts were over, the railroads had broken the relative isolation of southern California, and life in San Diego County had become similar to other communities throughout the west. After World War I, the history of San Diego County was primarily determined by the growth of San Diego Bay. In 1919, the United States Navy decided to make the bay the home base for the Pacific Fleet (Pourade 1967) and, in the 1920s, the bay became the home to the aircraft industry (Heiges 1976). The establishment of these industries led to the growth of the county as a whole; however, most of the civilian population growth occurred in the north county coastal areas, where the population almost tripled between 1920 and 1930. During this time period, the history of inland San Diego County was subsidiary to that of the city of San Diego, which had become a Navy center and an industrial city (Heiges 1976). In inland San Diego County, agriculture became specialized and recreational areas were established in the mountain and desert areas. Just before World War II, urbanization began to spread to the inland parts of the county.

The first commercially licensed radio station in San Diego started broadcasting in 1925 out of the U.S. Grant Hotel downtown, initially given the call letters KFVW before changing its name to KFSD (standing for “First in San Diego”). By 1928, the station had gone bankrupt and was sold to local businessman Thomas E. Sharp who, in 1948, would move the station out of the U.S. Grant Hotel and into a newly constructed hilltop facility. This facility still exists and is now operated by local radio station KOGO. Sharp’s most lasting impact on the region would come with his donation of \$500,000 to the San Diego Hospital Association in 1950 for a new hospital named for his son, who was shot down and killed in action near Bonn, Germany, six years prior. The Donald N. Sharp Memorial Hospital, better known simply as Sharp Memorial Hospital, still operates today as one of seven hospitals in the regional not-for-profit Sharp HealthCare group (Sharp.com 2023). The area around the KFSD buildings has since been developed into the Emerald Hills neighborhood.

III. AREA OF POTENTIAL EFFECT

This archaeological review encompassed the entire Emerald Hills Project (APN 543-340-02) located northwest of the intersection of Old Memory Lane and 60th Street. The majority of the APE is currently vacant; however, much of the property has previously been developed for use in radio broadcasting (Plate 2). The vegetation primarily consists of what can be characterized as introduced grasses and trees. The 31.18-acre (gross) APE is proposed for re-zoning to be used for single-family residential properties.



Plate 2: View of the radio station transmission building and surrounding infrastructure, facing northeast.

IV. STUDY METHODS

An archaeological records search for a one-half-mile radius around the project was conducted by the SCIC at SDSU, the results of which were reviewed by BFSa (Appendix B). The SCIC did not identify any previously recorded archaeological sites within the project boundaries. However, three cultural resources and three historic addresses are located within one-half mile of the project. The cultural resources include a Craftsman-style bungalow, a historic water tank, and a prehistoric habitation site. Two of the historic addresses were recorded as cultural resources (Sites P-37-023927 and P-37-033124), while the third historic address (1725 Republic Street) is not recorded as a cultural resource. The prehistoric habitation site (SDI-11,165 [SDM-W-1616]) is located along the edge of Chollas Creek, adjacent to Highway 94 and directly east of Kelton Street. This site includes a midden component near Kelton Street measuring approximately 15 meters by 35 meters, as well as a widespread scatter of materials towards Federal Boulevard (Smith 1989). This scatter of materials lacks provenience due to disturbance. The cultural resource location map attached to the archaeological site record shows the existence of another prehistoric site (SDM-W-1504) immediately north of the Emerald Hills Project APE; however, the records search did not locate any documentation associated with this prehistoric site. BFSa reviewed in-house records for additional information about SDM-W-1504. This site was addressed in the 1989 archaeological survey and site evaluation study for the South Chollas Valley Truck Sewer Project

prepared by Brian F. Smith. This report describes Site SDM-W-1504 as “a large, dispersed lithic and midden scatter; probably a camp of the La Jolla Complex” (Smith 1989). The report indicates that the site was disturbed at the time of the study, and a review of current aerial imagery indicates that the site has likely been destroyed by residential development.

In total, 21 cultural resource studies have been conducted within a one-quarter-mile radius of the project, three of which overlap the subject property (Bowden-Renna et al. 2015; Dyett & Bhatia 2015; U.S. Department of Homeland Security 2011). The Bowden-Renna et al. (2015) and Dyett & Bhatia (2015) studies are large overviews related to the Southeastern San Diego and Encanto Community Plan Updates and, as a result, do not directly address the subject property. In contrast, the U.S. Department of Homeland Security (2011) study is a review of proposed improvements to the existing KOGO radio station building and towers within the project area. These improvements included the construction of three prefabricated metal structures on concrete pads and the construction of a chain-link fence around them. The report indicated that the Federal Emergency Management Agency (FEMA) evaluated the existing 1948 to 1949 radio transmitter building as “eligible for listing on the [NRHP] under Criteria A and B.” However, the report states that “the two paragraphs of context and evaluation [from the FEMA report] are insufficient to support a conclusive determination of eligibility” (U.S. Department of Homeland Security 2011). Regardless, it was concluded that the proposed improvements would have no adverse effect to the transmitter building. In addition, the report states that undiscovered archaeological resources are unlikely to be present adjacent to the radio facility (U.S. Department of Homeland Security 2011).

BFSa also consulted historic maps and aerial photographs of the subject property. The maps and photographs indicate that the property was vacant prior to the establishment of the radio infrastructure between 1948 and 1949. Since its development, the property has always been used for radio broadcasting. Development of the general area appears to have begun prior to the early 1950s. In 1953, the area southwest and northeast of the property included some low-density residential development, while the remainder of the surrounding area was vacant except for a single church structure to the northwest. By 1964, the residential development to the southwest and northeast of the property continued, and these areas were transformed from low-density to high-density residential areas. Additionally, by 1964, the road located north of the property was converted into Highway 94, separating the subject property from the residential development on the northwest, and Johnson Elementary School was established west of the property. Between 1971 and 1978, the residences immediately south of the property, along Old Memory Lane, were constructed. Prior to the construction of the residences on the southwestern perimeter, the property had direct visual and physical access to Radio Canyon. The construction of the residences on the southwest perimeter separated the property from the Radio Canyon open space; however, the property still retained the same viewshed due to its higher elevation. Aerial photographs from 1978 also show that the area immediately north of the property had been graded. By 1981, new residences were constructed on this graded area. It appears that the development of the surrounding area was completed by 1981, at which time the property was generally surrounded by residential development.

The SCIC reviewed the following historic sources:

- The NRHP Index
- The Office of Historic Preservation, Archaeological Determinations of Eligibility
- The Office of Historic Preservation, Directory of Properties in the Historic Property Data File
- San Diego County (1872)
- Historic Roads of San Diego County (1769-1855)
- The USGS *National City* (15-minute) topographic map (1953)

These sources did not indicate the presence of cultural resources within or immediately adjacent to the project. The proposed Emerald Hills Project does not appear to directly impact any known archaeological or Native American resources. However, due to the large prehistoric site recorded immediately north of the property, there is a potential that masked and buried archaeological deposits are present within the project boundaries. BFSa also requested a records search of the Sacred Lands File of the Native American Heritage Commission (NAHC). The NAHC search was returned with negative results (Appendix C).

V. RESULTS OF THE STUDY

Background Research

The areas of the Emerald Hills neighborhood have yielded cultural remains that document the prehistoric and early historic occupation of the region. For example, a few miles to the northwest, sites such as SDI-11,165 represent early habitation sites (Early Archaic La Jolla Complex and Late Prehistoric Kumeyaay) beginning approximately 5,000 YBP.

Field Reconnaissance

BFSa Archaeological Field Director Clarence Hoff conducted the pedestrian survey of the project on October 27, 2022, together with Kumeyaay tribal representative Cesar Welch of Red Tail Environmental. Approximately 40 percent of the property is developed, containing the transmitter building and two radio transmission towers dated to 1948 and 1949 (Plates 3 and 4), associated features and outbuildings, a concrete v-ditch, culverts, and paved access roads. Most neighboring properties are developed and consist of high-density single-family residences to the north, east, and south, and an elementary school and Emerald Hills Park to the west. A survey form, field notes, and photographs documented the survey work undertaken.

Vegetation on the remaining 60 percent of the property consists mostly of weeds and grasses, with some pockets of sage scrub located around the perimeter and a few eucalyptus trees along the northwest property boundary.



Plate 3: View of both transmission towers, facing south.



Plate 4: The front façade, entryway, patio, and driveway of the station transmission building, facing southwest.

Outside of the radio station facility, the survey involved the inspection of the undeveloped portions of the property for the presence of archaeological resources. Previous impacts to the property include a history of disking and grading. Aside from the historic structures located within the property, no cultural resources were observed during the investigation. As only three previously identified cultural resources are located within one-half mile of the project, no previously recorded cultural resources are located within the project aside from the historic building and transmission towers, and given the history of disking and grading, there is a low possibility for the presence of archaeological resources within the previously undeveloped areas of the project. Therefore, no additional mitigation measures, such as archaeological or Native American monitoring during earthmoving activities, are recommended as a condition of approval for this project.

Evaluation

The Phase I archaeological assessment for the Emerald Hills Project identified the presence of one historic radio transmission building built in 1948 and two associated transmission towers built in 1948 and 1949. These structures operated collectively as part of the KFSD radio station and have been evaluated separately. The assessment did not identify any archaeological resources within the property. Given the history of disturbance on the property and the lack of cultural resources identified as a result of the survey and records search, no archaeological or Native American monitoring is recommended as a condition of approval for the project.

VI. RECOMMENDATIONS

The City of San Diego typically requires two tasks for an archaeological study of this nature: an assessment of the potential for cultural resources on the property and a visual inspection for the presence of cultural resources. As noted previously, no prehistoric or historic archaeological resources were identified during the survey of the property. Three historic structures were identified, however. Because the future development of the property would require removal of the existing structures, a historic structure assessment will be required by the City of San Diego in order to determine the significance of the structures and whether their removal would result in an adverse impact to the built environment. The historic assessment should include a full architectural evaluation and additional archival research to determine the potential significance of the KFSD/KOGO radio station and its association with Thomas E. Sharp.

VII. SOURCES CONSULTED

DATE

National Register of Historic Places <input checked="" type="checkbox"/>	Month and Year: April 2023
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California Register of Historical Resources <input checked="" type="checkbox"/>	Month and Year: April 2023
City of San Diego Historical Resources Register <input checked="" type="checkbox"/>	Month and Year: April 2023
Archaeological/Historical Site Records: South Coastal Information Center <input checked="" type="checkbox"/>	Month and Year: April 2023
Other Sources Consulted: NAHC Sacred Lands File Search (Appendix C) References (see Section IX)	

VIII. CERTIFICATION

I hereby certify that the statements furnished above and in the attached exhibits present the data and information required for this archaeological report, and that the facts, statements, and information presented are true and correct to the best of my knowledge and belief and have been compiled in accordance with CEQA criteria as defined in Section 15064.5 and City of San Diego Historical Resources Guidelines.



Tracy A. Stropes, M.A., RPA
Senior Archaeologist

January 31, 2024

Date

IX. REFERENCES

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Altitude Business Center, Chino, San Bernardino County. Served as archaeological monitor under the supervision of Brian F. Smith. **2021-Present**

Cabot New Jersey, Redlands, San Bernardino County. Served as archaeological monitor under the supervision of Brian F. Smith. **2021-Present**

Indian & Ramona, Perris, Riverside County. Served as archaeological monitor under the supervision of Brian F. Smith. **2021-Present**

Los Olivos (TR 37294; BGR2000103), Riverside County. Served as archaeological monitor under the supervision of Brian F. Smith. **2021-Present**

Epoca, San Diego, San Diego County. Served as archaeological monitor under the supervision of Brian F. Smith. **2021-Present**

Perris Logistics Center, Perris, Riverside County. Served as archaeological monitor under the supervision of Brian F. Smith. **2021-Present**

Oak Creek, Escondido, San Diego County. Served as archaeological monitor under the supervision of Brian F. Smith. **2021-Present**

West Knapp, Vista, San Diego County. Served as archaeological monitor under the supervision of Brian F. Smith. **2021-Present**

Fontana 489, Fontana, San Bernardino County. Served as archaeological monitor under the supervision of Brian F. Smith. **2021-Present**

Cabrillo National Monument, San Diego, San Diego County. Served as archaeological monitor under the supervision of Brian F. Smith. **2021-Present**

Green Oak Villas, Vista, San Diego County. Served as archaeological monitor under the supervision of Brian F. Smith. **2021-Present**

Starling Pointe, San Jacinto, Riverside County. Served as archaeological monitor under the supervision of Brian F. Smith. **2021-Present**

Rider 2, Perris, Riverside County. Served as archaeological monitor under the supervision of Brian F. Smith. **2021-Present**

Radian, San Diego, San Diego County. Served as archaeological monitor under the supervision of Brian F. Smith. **2021-Present**

APPENDIX A

Resumes of Key Personnel

John J. Baber, BA, MA, MS, RPA

Archaeologist

BFSA Environmental Services

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Phone: (858) 679-8218 • Fax: (858) 679-9896 • E-Mail: jbaber@bfsa.perennialenv.com



Education

Master of Science, Human Osteoarcheology, University of Edinburgh	2014
Master of Arts, Anthropology, University of California, Santa Barbara	2013
Bachelor of Arts, Anthropology, University of California, San Diego	2011

Specialized Education/Training

Professional Certificate in Geographic Information Systems, University of California, San Diego	2022
Laboratory Analysis, Okinawa Prefectural Archaeological Center, Japanese National Museum of Nature and Science, Kyoto University, Sapporo Medical University, Smithsonian National Museum of Natural History (Repatriation Lab)	2015–2018
Jomon Field School, Aomori, Japan, Professor Junko Habu, University of California, Berkeley	2010
Rio Muerto Field School, Moquegua, Peru, Professor Paul Goldstein, University of California, San Diego	2008

Experience

Archaeologist

Brian F. Smith and Associates, Inc.

Poway, California

April 2021–Present

Full-time archaeological field technician, archaeological monitoring, lab work.

Project Experience

San Diego International Airport, San Diego, San Diego County. Served as archaeological monitor under the supervision of Brian F. Smith. **2022–Present**

Otay Business Park, San Diego, San Diego County. Served as field technician conducting archaeological data recovery under the supervision of Brian F. Smith. **2022–Present**

1834 Spindrift, San Diego, San Diego County. Served as field technician conducting archaeological data recovery under the supervision of Brian F. Smith. **2021–Present**

Oceanside Pavilion – Ocean Kamp, Oceanside, San Diego County. Served as field technician conducting archaeological data recovery under the supervision of Brian F. Smith. **2022–Present**

Rancho Diamante (Tract 35393), Hemet, Riverside County. Served as archaeological monitor under the supervision of Brian F. Smith. **2021–Present**

Citacado Parkway, Escondido, San Diego County. Served as field technician conducting archaeological data recovery under the supervision of Brian F. Smith. **2021–Present**

The Farms, Poway, San Diego County. Served as archaeological monitor under the supervision of Brian F. Smith. **2021–Present**

North City West, San Marcos, San Diego County. Served as archaeological monitor under the supervision of Brian F. Smith. **2021–Present**

Serrano (T1M 37153; BGR1800380), Riverside County. Served as archaeological monitor under the supervision of Brian F. Smith. **2021–Present**

Fairfield, Poway, San Diego County. Served as archaeological monitor under the supervision of Brian F. Smith. **2021–Present**

Boyle, Fontana, San Bernardino County. Served as archaeological monitor under the supervision of Brian F. Smith. **2021–Present**

San Gorgonio Crossing (PP25337; TMP 36564; BGR1800247), Riverside County. Served as archaeological monitor under the supervision of Brian F. Smith. **2022–Present**

10905 Beech, Fontana, San Bernardino County. Served as archaeological monitor under the supervision of Brian F. Smith. **2021–Present**

The Abby, Ontario, San Bernardino County. Served as archaeological monitor under the supervision of Brian F. Smith. **2021–Present**

Brisas Del Mar, San Diego, San Diego County. Served as field technician conducting archaeological data recovery under the supervision of Brian F. Smith. **2021–Present**

Almeria, San Bernardino County. Served as field technician conducting archaeological data recovery under the supervision of Brian F. Smith. **2021–Present**

800 Broadway, San Diego, San Diego County. Served as archaeological monitor under the supervision of Brian F. Smith. **2021–Present**

Knox III & IV (PP25837; PP25838; PM36950; PM36962; BGR1900126; BGR1900123), Riverside County. Served as archaeological monitor under the supervision of Brian F. Smith. **2021–Present**

8230 Prestwick, San Diego, San Diego County. Served as archaeological monitor under the supervision of Brian F. Smith. **2021–Present**

Sagewood (Tract 37400), Menifee, Riverside County. Served as archaeological monitor under the supervision of Brian F. Smith. **2021–Present**

Perry Commerce (BGR2000297), Riverside County. Served as archaeological monitor under the supervision of Brian F. Smith. **2021–Present**

Enclave, Upland, San Bernardino County. Served as archaeological monitor under the supervision of Brian F. Smith. **2021–Present**

Altitude Business Center, Chino, San Bernardino County. Served as archaeological monitor under the supervision of Brian F. Smith. **2021-Present**

Cabot New Jersey, Redlands, San Bernardino County. Served as archaeological monitor under the supervision of Brian F. Smith. **2021-Present**

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Green Oak Villas, Vista, San Diego County. Served as archaeological monitor under the supervision of Brian F. Smith. **2021-Present**

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Radian, San Diego, San Diego County. Served as archaeological monitor under the supervision of Brian F. Smith. **2021-Present**

Tracy A. Stropes, MA, RPA

Director/Principal Investigator

BFSA Environmental Services, A Perennial Company

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Education

Master of Arts, Anthropology, San Diego State University, California 2007

Bachelor of Science, Anthropology, University of California, Riverside 2000

Professional Memberships

Register of Professional Archaeologists

Society for California Archaeology

Archaeological Institute of America

Experience

Director/Principal Investigator
BFSA Environmental Services, a Perennial Company

March 2009–Present
Poway, California

Project Management of all phases of archaeological investigations for local, state, and federal agencies, field supervision, lithic analysis, National Register of Historic Places (NRHP) and California Environmental Quality Act (CEQA) site evaluations, and authoring/coauthoring of cultural resource management reports.

Archaeological Principal Investigator
TRC Solutions

June 2008–February 2009
Irvine, California

Cultural resource segment of Natural Sciences and Permitting Division; management of archaeological investigations for private companies and local, state, and federal agencies, personnel management, field and laboratory supervision, lithic analysis, Native American consultation and reporting, MRHP and CEQA site evaluations, and authoring/coauthoring cultural resource management reports.

Principal Investigator and Project Archaeologist
Archaeological Resource Analysts

June 2006–May 2008
Oceanside, California

As a sub consultant, served as Principal Investigator and Project Archaeologist for several projects for SRS Inc., including field direction, project and personnel management, lab analysis, and authorship of company reports.

Project Archaeologist
Gallegos & Associates

September 1996–June 2006
Carlsbad, California

Project management, laboratory management, lithic analysis, field direction, Native American consultation, report authorship/technical editing, and composition of several data recovery/preservation programs for both CEQA and NEPA level compliance.

**Project Archaeologist
Macko Inc.**

**September 1993–September 1996
Santa Ana, California**

Project management, laboratory management, lithic analysis, field supervision, and report authorship/technical editing.

**Archaeological Field Technician
Chambers Group Inc.**

**January 1993–September 1993
Irvine, California**

Archaeological excavation, surveying, monitoring, wet screen facilities management, and project logistics.

**Archaeological Field Technician
John Minch and Associates**

**May 1992–September 1992
San Juan Capistrano, California**

Archaeological excavation, surveying, monitoring, wet screen facilities management, and project logistics.

Professional Accomplishments

Mr. Stropes is a professional archaeologist with over 30 years of experience in cultural resource management. His experience includes over ten years in project management, report authorship, lithic analysis, laboratory management, Native American consultation, and editing for several technical reports for numerous projects throughout southern California. Mr. Stropes has conducted cultural resource surveys, archaeological site testing and evaluations for National Register eligibility and California Environmental Quality Act (CEQA) compliance, mitigation of resources through data recovery for archaeological sites, budget and report preparation, and direction of crews of all sizes for projects ranging in duration from a single day site visit to one year. Mr. Stropes is a Registered Professional Archaeologist and on the list of archaeological consultants qualified to conduct archaeological investigations southern California and the County of San Diego. He has served as project archaeologist for numerous projects and composed data recovery and preservation programs for sites throughout California for both CEQA and NEPA level compliance. He has acted as teaching assistant for archaeological field classes at several sites in Orange (Cypress College), Los Angeles (Cypress College), and San Diego Counties (San Diego State University). In addition, Mr. Stropes was employed to teach discussion sessions for introduction to cultural anthropology classes at SDSU. Internationally, Mr. Stropes has acted as field surveyor for the Natural History Foundation of Orange County & Institucion Nacional de Antropologia y Historia surveying and relocating several sites in northern Baja California. Mr. Stropes has served as the senior project archaeologist on the following select projects.

1900 and 1912 Spindrift Drive: An extensive data recovery and mitigation monitoring program at the Spindrift Site, an important prehistoric archaeological habitation site stretching across the La Jolla area. The project resulted in the discovery of over 20,000 artifacts and nearly 100,000 grams of bulk faunal remains and marine shell, indicating a substantial occupation area (2013-2014).

Ocean Breeze Ranch: An extensive CEQA and Section 106 archaeological investigation of 1,400 acres and 20 cultural resources, both prehistoric and historic, within the Bonsall neighborhood of the county of San Diego. The project included an assessment of sites for eligibility for listing on the California Register of Historical Resources, the County of San Diego Resource Protection Ordinance, and the National Register of Historic Places, which resulted in the identification of four CRHR-eligible, RPO-significant, and NRHP-eligible sites.

Citracado Parkway Extension: An ongoing project in the city of Escondido to mitigate impacts to an important archaeological occupation site. Various archaeological studies have been conducted by BFSA, including CEQA-level survey and testing programs and Section 106 historic resources studies, resulting in the identification of a significant cultural deposit within the project area (2009-present).

Otay Ranch Village 13: An extensive archaeological investigation of nearly 2,000 acres and 84 archaeological sites, both prehistoric and historic, within the county of San Diego, which included prehistoric habitation sites, quarry sites, resource processing sites, and extensive lithic scatters. The project included an assessment of sites for eligibility for listing on the National Register of Historic Places (2016-2018).

Westin Hotel and Timeshare (Grand Pacific Resorts): Data recovery and mitigation monitoring program in the city of Carlsbad consisted of the excavation of 176 one-square-meter archaeological data recovery units which produced thousands of prehistoric artifacts and ecofacts, and resulted in the preservation of a significant prehistoric habitation site. The artifacts recovered from the site presented important new data about the prehistory of the region and Native American occupation in the area (2017).

Cantarini Ranch: A Section 106 archaeological assessment and evaluation for the NRHP of 15 archaeological sites and three isolates, including NRHP-significant prehistoric temporary camp/habitation sites, in the city of Carlsbad (2015-2017).

Citracado Business Park West: An archaeological survey and testing program at a significant prehistoric archaeological site and historic building assessment for a 17-acre project in the city of Escondido. The project resulted in the identification of 82 bedrock milling features, two previously recorded loci and two additional and distinct loci, and approximately 2,000 artifacts (2018).

College Boulevard: A Section 106 archaeological assessment and evaluation for the NRHP of seven archaeological sites, including prehistoric temporary camp/habitation sites, bedrock milling feature sites, and both prehistoric and historic artifact scatters in the city of Carlsbad (2015).

The Everly Subdivision Project: Data recovery and mitigation monitoring program in the city of El Cajon resulted in the identification of a significant prehistoric occupation site from both the Late Prehistoric and Archaic Periods, as well as producing historic artifacts that correspond to the use of the property since 1886. The project produced an unprecedented quantity of artifacts in comparison to the area encompassed by the site, but lacked characteristics that typically reflect intense occupation, indicating that the site was used intensively for food processing (2014-2015).

APPENDIX B

Archaeological Records Search Results

BRIAN F. SMITH and ASSOCIATES

CALIFORNIA HISTORICAL RESOURCES INFORMATION SYSTEMS RECORDS SEARCH

Company: Brian F. Smith and Associates
Processed By: Emily T. Soong
Date Processed: October 26, 2022
Project Identification: Emerald Estates
Information Center: South Coastal Information Center
Search Radius: Half Mile Buffer

Historical Resources:

Trinomial and Primary site maps have been reviewed. All sites within the project boundaries and the specified radius of the project area have been plotted. Copies of the site record forms have been reviewed for all recorded sites.

There are three historic addresses and three resources located within a half-mile radius of the current project area, none of which are located within the subject property.

Previous Survey Report Boundaries:

Project boundary maps have been reviewed. National Archaeological Database (NADB) citations for reports within the project boundaries and within the specified radius of the project area have been reviewed.

There are 21 reports within a half-mile radius of the current project area, three of which overlap with the subject property (SD-13236, SD-15977, and SD-16001).



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Office: (619) 594-5682
www.scic.org
scic@mail.sdsu.edu

CALIFORNIA HISTORICAL RESOURCES INFORMATION SYSTEM CLIENT IN-HOUSE RECORDS SEARCH

Company: BFSA

Company Representative: Emily Soong

Date: 10/26/2022

Project Identification: Emerald Estates

Search Radius: 1/2 mile

Historical Resources:

SELF

Trinomial and Primary site maps have been reviewed. All sites within the project boundaries and the specified radius of the project area have been plotted. Copies of the site record forms have been included for all recorded sites.

Previous Survey Report Boundaries:

SELF

Project boundary maps have been reviewed. National Archaeological Database (NADB) citations for reports within the project boundaries and within the specified radius of the project area have been included.

Historic Addresses:

SELF

A map and database of historic properties (formerly Geofinder) has been included.

Historic Maps:

SELF

The historic maps on file at the South Coastal Information Center have been reviewed, and copies have been included.

Copies: 39

Hours: 2.5

Excel Lines = 26 Lines

ETS

APPENDIX C

NAHC Sacred Lands File Search Results



Brian F. Smith & Associates

Archaeological/Biological/Historical/Paleontological/Air/Traffic/Noise Consulting

October 20, 2022

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

From: Emily T. Soong
Brian F. Smith and Associates Inc.
14010 Poway Rd. Suite A
Poway, CA 92064

Re: Request for Sacred Lands File and Native American Contact List for the Emerald Estates Due Diligence Project, San Diego, San Diego County, California.

I would like to request a record search of the Sacred Lands File and a list of appropriate Native American contacts for the following project: [Emerald Estates Due Diligence Project \(Project No. 22-351\)](#). The project is a due diligence study for APN 543-340-02-00, in San Diego, San Diego County, California. Specifically, the project is in Township 17 South, Range 2 West, projected in the USGS *National City*, California topographic quadrangle. Please find the enclosed map on which the project is delineated.

Thank you for your time.

Sincerely,

Emily T. Soong
Associate Archaeologist
Billing: 14678 Ibex Court, San Diego, CA 92129
Phone: 858-484-0915
Email: emily@bfsa-ca.com

Attachments:

USGS 7.5 *National City*, California, topographic maps with project area delineated.
Sacred Lands File request form

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: Emerald Estates Due Diligence Project (Project No. 22-351)

County: San Diego

USGS Quadrangle Name(s): *National City*

Township 17 South, Range 2 West, projected

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

Contact Person: Emily T. Soong

Street Address: 14010 Poway Road, Suite A

City: Poway Zip: 92064

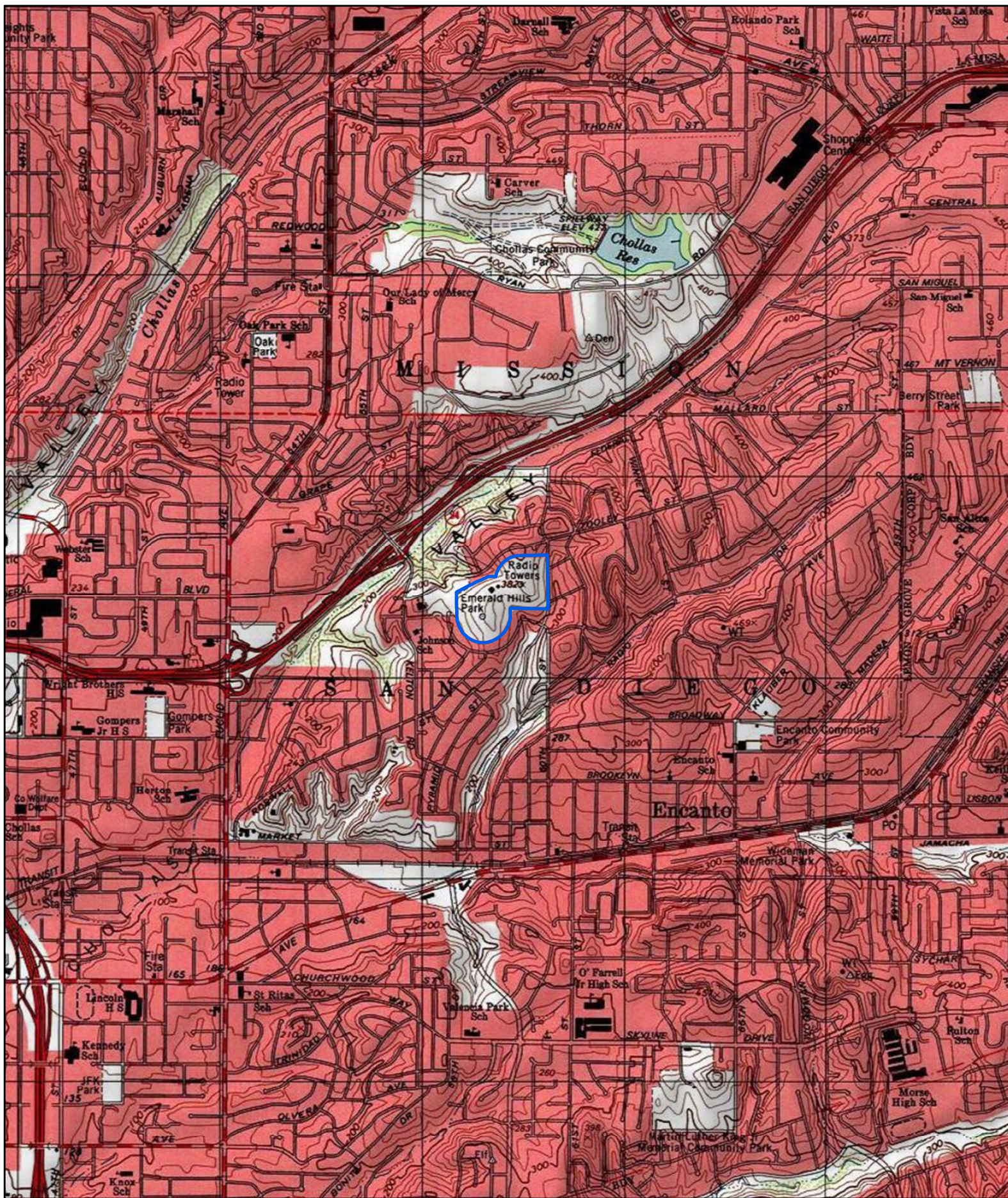
Phone: 858-484-0915

Fax: 858-679-9896

Email: emily@bfsa-ca.com

Project Description:

I would like to request a record search of the Sacred Lands File and a list of appropriate Native American contacts for the following project: ***Emerald Estates Due Diligence Project (Project No. 22-351)***. The project is a due diligence study for APN 543-340-02-00, in San Diego, San Diego County, California. Specifically, the project is in Township 17 South, Range 2 West, projected in the USGS *National City*, California topographic quadrangle. Please find the enclosed map on which the project is delineated.



The Emerald Estates Due Diligence Project
USGS National City Quadrangle
(7.5-minute series)

 Project

N
1:24,000
ETS BFSA: 10/20/22



NATIVE AMERICAN HERITAGE COMMISSION

December 6, 2022

Emily Soong
Brian F. Smith & Associates Inc.

Via Email to: emily@bfsa-ca.com

CHAIRPERSON
Laura Miranda
Luiseño

VICE CHAIRPERSON
Reginald Pagaling
Chumash

SECRETARY
Sara Dutschke
Miwok

COMMISSIONER
Isaac Bojorquez
Ohlone-Costanoan

COMMISSIONER
Buffy McQuillen
Yokayo Pomo, Yuki,
Nomlaki

COMMISSIONER
Wayne Nelson
Luiseño

COMMISSIONER
Stanley Rodriguez
Kumeyaay

COMMISSIONER
[VAVANT]

COMMISSIONER
[VACANT]

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

Re: Emerald Estates Due Diligence Project, San Diego County

Dear Ms. Soong:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information you have submitted for the above referenced project. The results were negative. However, the absence of specific site information in the SLF 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.

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. 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. 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 me. 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: Pricilla.Torres-Fuentes@nahc.ca.gov.

Sincerely,

Pricilla Torres-Fuentes

Pricilla Torres-Fuentes
Cultural Resources Analyst

Attachment

**Native American Heritage Commission
Native American Contact List
San Diego County
12/6/2022**

Barona Group of the Capitan Grande

Raymond Welch, Chairperson
1095 Barona Road Diegueno
Lakeside, CA, 92040
Phone: (619) 443 - 6612
Fax: (619) 443-0681
counciloffice@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

Ewiiapaayp 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

Ewiiapaayp 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

Iipay Nation of Santa Ysabel

Clint Linton, Director of Cultural Resources
P.O. Box 507 Diegueno
Santa Ysabel, CA, 92070
Phone: (760) 803 - 5694
clint@redtailenvironmental.com

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

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

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

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

Kwaaymii Laguna Band of Mission Indians

Carmen Lucas,
P.O. Box 775 Kwaaymii
Pine Valley, CA, 91962 Diegueno
Phone: (619) 709 - 4207

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

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
jmillier@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 Emerald Estates Due Diligence Project, San Diego County.

**Native American Heritage Commission
Native American Contact List
San Diego County
12/6/2022**

**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

**Sycuan Band of the Kumeyaay
Nation**

Kristie Orosco, Kumeyaay
Resource Specialist
1 Kwaaypaay Court Kumeyaay
El Cajon, CA, 92019
Phone: (619) 445 - 6917

**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

**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

**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

**Viejas Band of Kumeyaay
Indians**

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

**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

**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

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 Emerald Estates Due Diligence Project, San Diego County.



BFSA Environmental Services
A Perennial Company

Archaeology/History/Paleontology/Biology

November 23, 2022

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 Emerald Estates Project,
San Diego County, California

Dear Allen:

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Emerald Estates Project. The information you provide will help assess potential impacts 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. This is part of the information gathering/exchange process for cultural resource studies and **is not** part of the Assembly Bill 52 or Senate Bill 18 consultation process executed between government agencies.

The proposed project is in San Diego County, California and includes the development of Assessor's Parcel Number 543-340-02-00. The project can be found in the community of National City, San Diego County. Specifically, the project is in Township 17 South, Range 2 West, projected in the USGS *National City*, California topographic quadrangle. Please find enclosed sections of the USGS *National City* Quadrangle map on which the project is delineated.

Currently, we are awaiting receipt of the Sacred Lands File search results from the Native American Heritage Commission (NAHC). In anticipation that the NAHC will include you on the list of individuals or tribal entities to be contacted as part of the Native American consultation process, we are consulting you directly regarding the potential that Native American cultural resources may be impacted by this project. If you have any information to provide us regarding any resources on or near the project, please contact Brian Smith or myself at (858) 679-8218. We would like to extend our thanks for your response regarding this issue.

Sincerely,

Tracy A. Stropes, M.A., RPA
Director/Principal Archaeologist
tstropes@bfsa.perennialenv.com

Attachment: USGS 7.5-minute *National City*, California topographic map with project area delineated



BFSA Environmental Services
A Perennial Company

Archaeology/History/Paleontology/Biology

November 23, 2022

Angela Elliott Santos
Chairperson
Manzanita Band of Kumeyaay Nation
P.O. Box 1302
Boulevard, California 91905

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

Dear Angela:

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Emerald Estates Project. The information you provide will help assess potential impacts 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. This is part of the information gathering/exchange process for cultural resource studies and **is not** part of the Assembly Bill 52 or Senate Bill 18 consultation process executed between government agencies.

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Sincerely,

Tracy A. Stropes, M.A., RPA
Director/Principal Archaeologist
tstropes@bfsa.perennialenv.com

Attachment: USGS 7.5-minute *National City*, California topographic map with project area delineated



BFSA Environmental Services
A Perennial Company

Archaeology/History/Paleontology/Biology

November 23, 2022

Carmen Lucas
Kwaaymii Laguna Band of Mission Indians
P.O. Box 775
Pine Valley, California 91962

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

Dear Carmen:

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Emerald Estates Project. The information you provide will help assess potential impacts 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. This is part of the information gathering/exchange process for cultural resource studies and **is not** part of the Assembly Bill 52 or Senate Bill 18 consultation process executed between government agencies.

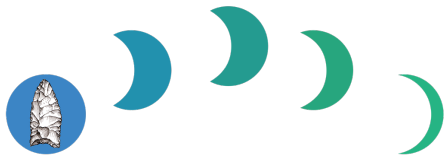
The proposed project is in San Diego County, California and includes the development of Assessor's Parcel Number 543-340-02-00. The project can be found in the community of National City, San Diego County. Specifically, the project is in Township 17 South, Range 2 West, projected in the USGS *National City*, California topographic quadrangle. Please find enclosed sections of the USGS *National City* Quadrangle map on which the project is delineated.

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Sincerely,

Tracy A. Stropes, M.A., RPA
Director/Principal Archaeologist
tstropes@bfsa.perennialenv.com

Attachment: USGS 7.5-minute *National City*, California topographic map with project area delineated



BFSA Environmental Services
A Perennial Company

Archaeology/History/Paleontology/Biology

November 23, 2022

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 Emerald Estates Project,
San Diego County, California

Dear Clint:

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Emerald Estates Project. The information you provide will help assess potential impacts 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. This is part of the information gathering/exchange process for cultural resource studies and **is not** part of the Assembly Bill 52 or Senate Bill 18 consultation process executed between government agencies.

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Sincerely,

Tracy A. Stropes, M.A., RPA
Director/Principal Archaeologist
tstropes@bfsa.perennialenv.com

Attachment: USGS 7.5-minute *National City*, California topographic map with project area delineated



November 23, 2022

Cody J. Martinez
Chairperson
Sycuan Band of the Kumeyaay Nation
1 Kwaaypaay Court
El Cajon, California 92019

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

Dear Cody:

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Emerald Estates Project. The information you provide will help assess potential impacts 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. This is part of the information gathering/exchange process for cultural resource studies and **is not** part of the Assembly Bill 52 or Senate Bill 18 consultation process executed between government agencies.

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Sincerely,

Tracy A. Stropes, M.A., RPA
Director/Principal Archaeologist
tstropes@bfsa.perennialenv.com

Attachment: USGS 7.5-minute *National City*, California topographic map with project area delineated



BFSA Environmental Services
A Perennial Company

Archaeology/History/Paleontology/Biology

November 23, 2022

Edwin Romero
Chairperson
Barona Group of the Capitan Grande
1095 Barona Road
Lakeside, California 92040

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

Dear Edwin:

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Emerald Estates Project. The information you provide will help assess potential impacts 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. This is part of the information gathering/exchange process for cultural resource studies and **is not** part of the Assembly Bill 52 or Senate Bill 18 consultation process executed between government agencies.

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Sincerely,

Tracy A. Stropes, M.A., RPA
Director/Principal Archaeologist
tstropes@bfsa.perennialenv.com

Attachment: USGS 7.5-minute *National City*, California topographic map with project area delineated



BFSA Environmental Services
A Perennial Company

Archaeology/History/Paleontology/Biology

November 23, 2022

Erica Pinto
Chairperson
Jamul Indian Village
P.O. Box 612
Jamul, California 91935

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

Dear Erica:

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Emerald Estates Project. The information you provide will help assess potential impacts 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. This is part of the information gathering/exchange process for cultural resource studies and **is not** part of the Assembly Bill 52 or Senate Bill 18 consultation process executed between government agencies.

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Sincerely,

Tracy A. Stropes, M.A., RPA
Director/Principal Archaeologist
tstropes@bfsa.perennialenv.com

Attachment: USGS 7.5-minute *National City*, California topographic map with project area delineated



BFSA Environmental Services
A Perennial Company

Archaeology/History/Paleontology/Biology

November 23, 2022

Ernest Pingleton
Viejas Band of Kumeyaay Indians
1 Viejas Grade Road
Alpine, California 91901

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

Dear Ernest:

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Emerald Estates Project. The information you provide will help assess potential impacts 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. This is part of the information gathering/exchange process for cultural resource studies and **is not** part of the Assembly Bill 52 or Senate Bill 18 consultation process executed between government agencies.

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Sincerely,

Tracy A. Stropes, M.A., RPA
Director/Principal Archaeologist
tstropes@bfsa.perennialenv.com

Attachment: USGS 7.5-minute *National City*, California topographic map with project area delineated



BFSA Environmental Services
A Perennial Company

Archaeology/History/Paleontology/Biology

November 23, 2022

Gwendolyn Parada
Chairperson
La Posta Band of Mission Indians
8 Crestwood Road
Boulevard, California 91905

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

Dear Gwendolyn:

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Emerald Estates Project. The information you provide will help assess potential impacts 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. This is part of the information gathering/exchange process for cultural resource studies and **is not** part of the Assembly Bill 52 or Senate Bill 18 consultation process executed between government agencies.

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Sincerely,

Tracy A. Stropes, M.A., RPA
Director/Principal Archaeologist
tstropes@bfsa.perennialenv.com

Attachment: USGS 7.5-minute *National City*, California topographic map with project area delineated



BFSA Environmental Services
A Perennial Company

Archaeology/History/Paleontology/Biology

November 23, 2022

Javaughn Miller
Tribal Administrator
La Posta Band of Mission Indians
8 Crestwood Road
Boulevard, California 91905

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

Dear Javaughn:

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Emerald Estates Project. The information you provide will help assess potential impacts 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. This is part of the information gathering/exchange process for cultural resource studies and **is not** part of the Assembly Bill 52 or Senate Bill 18 consultation process executed between government agencies.

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Sincerely,

Tracy A. Stropes, M.A., RPA
Director/Principal Archaeologist
tstropes@bfsa.perennialenv.com

Attachment: USGS 7.5-minute *National City*, California topographic map with project area delineated



BFSA Environmental Services
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Archaeology/History/Paleontology/Biology

November 23, 2022

John Christman
Viejas Band of Kumeyaay Indians
1 Viejas Grade Road
Alpine, California 91901

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

Dear John:

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Emerald Estates Project. The information you provide will help assess potential impacts 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. This is part of the information gathering/exchange process for cultural resource studies and **is not** part of the Assembly Bill 52 or Senate Bill 18 consultation process executed between government agencies.

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Sincerely,

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Director/Principal Archaeologist
tstropes@bfsa.perennialenv.com

Attachment: USGS 7.5-minute *National City*, California topographic map with project area delineated



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Archaeology/History/Paleontology/Biology

November 23, 2022

John Flores
Environmental Coordinator
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 Emerald Estates Project,
San Diego County, California

Dear John:

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Emerald Estates Project. The information you provide will help assess potential impacts 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. This is part of the information gathering/exchange process for cultural resource studies and **is not** part of the Assembly Bill 52 or Senate Bill 18 consultation process executed between government agencies.

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Sincerely,

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Director/Principal Archaeologist
tstropes@bfsa.perennialenv.com

Attachment: USGS 7.5-minute *National City*, California topographic map with project area delineated



November 23, 2022

Kristie Orosco
Kumeyaay Resource Specialist
Sycuan Band of the Kumeyaay Nation
1 Kwaaypaay Court
El Cajon, California 92019

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

Dear Kristie:

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Emerald Estates Project. The information you provide will help assess potential impacts 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. This is part of the information gathering/exchange process for cultural resource studies and **is not** part of the Assembly Bill 52 or Senate Bill 18 consultation process executed between government agencies.

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Sincerely,

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Director/Principal Archaeologist
tstropes@bfsa.perennialenv.com

Attachment: USGS 7.5-minute *National City*, California topographic map with project area delineated



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November 23, 2022

Lisa K. Cumper
Cultural Resource Manager / Tribal Liaison
Jamul Indian Village
P.O. Box 612
Jamul, California 91935

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

Dear Lisa:

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Emerald Estates Project. The information you provide will help assess potential impacts 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. This is part of the information gathering/exchange process for cultural resource studies and **is not** part of the Assembly Bill 52 or Senate Bill 18 consultation process executed between government agencies.

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Director/Principal Archaeologist
tstropes@bfsa.perennialenv.com

Attachment: USGS 7.5-minute *National City*, California topographic map with project area delineated



BFSA Environmental Services
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Archaeology/History/Paleontology/Biology

November 23, 2022

Michael Garcia
Chairperson
Ewiiapaayp Band of Kumeyaay Indians
4054 Willows Road
Alpine, California 91901

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

Dear Michael:

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Emerald Estates Project. The information you provide will help assess potential impacts 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. This is part of the information gathering/exchange process for cultural resource studies and **is not** part of the Assembly Bill 52 or Senate Bill 18 consultation process executed between government agencies.

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tstropes@bfsa.perennialenv.com

Attachment: USGS 7.5-minute *National City*, California topographic map with project area delineated



BFSA Environmental Services
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Archaeology/History/Paleontology/Biology

November 23, 2022

Michael Linton
Chairperson
Mesa Grande Band of Diegueno Mission Indians
PO Box 270
Santa Ysabel, California 92070

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

Dear Michael:

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Emerald Estates Project. The information you provide will help assess potential impacts 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. This is part of the information gathering/exchange process for cultural resource studies and **is not** part of the Assembly Bill 52 or Senate Bill 18 consultation process executed between government agencies.

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tstropes@bfsa.perennialenv.com

Attachment: USGS 7.5-minute *National City*, California topographic map with project area delineated



BFSA Environmental Services
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Archaeology/History/Paleontology/Biology

November 23, 2022

Ralph Goff
Chairperson
Campo Band of Mission Indians
36190 Church Road, Suite 1
Campo, California 91906

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

Dear Ralph:

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Emerald Estates Project. The information you provide will help assess potential impacts 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. This is part of the information gathering/exchange process for cultural resource studies and **is not** part of the Assembly Bill 52 or Senate Bill 18 consultation process executed between government agencies.

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Sincerely,

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tstropes@bfsa.perennialenv.com

Attachment: USGS 7.5-minute *National City*, California topographic map with project area delineated



BFSA Environmental Services
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Archaeology/History/Paleontology/Biology

November 23, 2022

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

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

Dear Rebecca:

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Emerald Estates Project. The information you provide will help assess potential impacts 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. This is part of the information gathering/exchange process for cultural resource studies and **is not** part of the Assembly Bill 52 or Senate Bill 18 consultation process executed between government agencies.

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tstropes@bfsa.perennialenv.com

Attachment: USGS 7.5-minute *National City*, California topographic map with project area delineated



BFSA Environmental Services
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Archaeology/History/Paleontology/Biology

November 23, 2022

Robert Pinto
Chairperson
Ewiiapaayp Tribal Office
4054 Willows Road
Alpine, California 91901

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

Dear Robert:

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Emerald Estates Project. The information you provide will help assess potential impacts 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. This is part of the information gathering/exchange process for cultural resource studies and **is not** part of the Assembly Bill 52 or Senate Bill 18 consultation process executed between government agencies.

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Attachment: USGS 7.5-minute *National City*, California topographic map with project area delineated



BFSA Environmental Services
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Archaeology/History/Paleontology/Biology

November 23, 2022

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 Emerald Estates Project,
San Diego County, California

Dear Virgil:

This inquiry is requesting information you may have regarding the existence of Native American cultural resources on or near the Emerald Estates Project. The information you provide will help assess potential impacts 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. This is part of the information gathering/exchange process for cultural resource studies and **is not** part of the Assembly Bill 52 or Senate Bill 18 consultation process executed between government agencies.

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