

**PALA TRIBAL HISTORIC  
PRESERVATION OFFICE**

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PALA THPO

August 14, 2013

Mark Slovick  
County of San Diego Planning & Development Services  
5510 Overland Avenue, Suite 110  
San Diego, CA 92123

Re: PDS2012-3800-12-001 (GPA), PDS2012-3810-12-001 (SP), PDS2012-3600-12-003 (REZ), PDS2012-3100-5571 (TM), PDS2012-3100-5572 (TM), PDS2012-3300-12-005 (MUP), PDS2012-3500-12-017 (STP), PDS2012-3500-12-018 (STP), HLP XX-XXX LOG NO. 3910 12-02-003 (ER); SCH NO. 2012061100 LILAC HILLS RANCH MASTER PLANNED COMMUNITY

Dear Mr. Slovick,

Thank you for the opportunity to comment on the above-referenced project. This letter constitutes our response on behalf of Robert Smith, Chairman of the Pala Band of Mission Indians (Pala Band).

On October 10, 2012, I met with County staff to engage in SB 18 consultation on this project. At that meeting, I stressed that the Pala Band is concerned about the abundance of cultural resources within the project APE. I requested copies of all cultural reports and studies done for the project so that I could review them and continue consultation. Since then, I have spoken with Donna Beddow, Planning Manager, about the plans for mitigation to impacts on cultural resources, and I have reviewed the mitigation plan proposed in the DEIR. At this time, the Pala Band is satisfied with the proposed measures. As with every project, however, if any significant changes are made to the project as currently proposed, we wish to be notified so that we can respond to the changes. Furthermore, we would like to see the mitigation plan include further consultation with all Luiseno bands should any inadvertent discoveries be made. Finally, while the plan does allow the repatriation of artifacts to a Luiseno tribal government if any are discovered during project grading and construction, preference appears to be given to curation at a federally eligible facility. We would like to see repatriation to the Luiseno bands as the first option, with curation listed as an option only if no Luiseno band accepts the artifacts.

Thank you again for the opportunity to comment. Please contact me at [sgaughen@palatribe.com](mailto:sgaughen@palatribe.com) with any questions or concerns.

Sincerely,

Shasta C. Gaughen, PhD  
Tribal Historic Preservation Officer  
Pala Band of Mission Indians