

February 6, 2019

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VIA EMAIL
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Subject: Queen of the Valley Specific Plan Project: Summary of Findings from the Cultural Resource Analysis and Native American Consultation

Dear Mr. Anderson:

The purpose of this Letter is to summarize the results of the Cultural Resource Study and the tribal consultation conducted for Queen of the Valley Hospital Specific Plan (hereinafter referred to as “the Project”).

INTRODUCTION

The management of cultural resources falls within the jurisdiction of several levels of government. Federal laws provide the framework for the identification, protection, and mitigation of cultural resources. Additionally, states and local governments play active roles in identifying, documenting, and protecting resources within their communities. The National Historic Preservation Act (NHPA) of 1966, as amended, and the *California Public Resources Code* (PRC), Section 5024.1, are the primary federal and State laws, respectively, that govern the evaluation of significance of a cultural resource.

In California, the California Environmental Quality Act (CEQA) is a statute that requires lead agencies to identify the significant environmental impacts caused by their actions, including their effects to cultural and historic resources. CEQA applies to all projects that are approved through a discretionary process by State, local, and public agencies. Resources listed in or determined to be eligible for the California Register of Historical Resources (CRHR) must be considered in the CEQA process.

In State and local governments, resources are considered historically or culturally significant if the resource is eligible to be listed on a local register(s) or can satisfy the criteria for significance set forth by federal and State regulations. In California, resources are considered significant under the CEQA if the resource is eligible for listing on the CRHR, which is modeled after the federal register, the National Register of Historic Places (hereinafter referred to as the “National Register”). A resource may also be considered significant if the resource is listed on a local register and/or has been treated as a significant resource by a lead agency in the past.

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PROJECT DESCRIPTION

A “specific plan” is a customized regulatory document established in order to provide a flexible means of implementing a General Plan. It provides more focused guidance and regulations and details the permitted uses of specific areas. The proposed QVHSP would govern the future development of the entire hospital campus. In addition to the QVHSP, the EIR Program will also examine “reasonable worst case” assumptions about the ultimate hospital development to address all future potential environmental impacts that could occur as the hospital expands.

The Queen of the Valley Hospital Specific Plan (QVHSP) Project site occupies approximately 28.8 acres and is located at 1135 S. Sunset Avenue in the City of West Covina. The property is at the north corner of South Sunset Avenue and West Merced Avenue approximately a half mile south of the Interstate (I)-10 Freeway in the east-central portion of the San Gabriel Valley. The City is approximately 18 miles east of downtown Los Angeles and 3 miles east of the I-10/Interstate 605 (I-605) Freeway Interchange. The site is located at 34° 3' 50" North latitude and 117° 56' 43" West longitude, within Section 20 of Township 1 South Range 10 West in West Covina. The property is in the *Baldwin Park* (1972) 7.5-minute series topographic map by the U.S. Geological Survey (USGS). The project's site location is shown in Exhibit 1.

METHODS

This study used the results of the West Covina General Plan EIR (Rincon Consultants, Inc 2016), which listed West Covina's most important (public, non-restricted) resources, to assess the Project's impacts to cultural resources. A database search of the public, non-restricted data concerning NRHP resources was conducted on October 30, 2018 (National Park Service 2018). A historic and archaeological record search was conducted on December 6, 2018 at the South Central Coastal Information Center (SCCIC), located on the campus of California State University, Fullerton. The SCCIC houses records of the California Historical Resources Information System (CHRIS) for Los Angeles, Orange, Ventura, and San Bernardino Counties. The records search included a 0.8-kilometer (0.5-mile) radius around the project area and was conducted by Psomas archaeologist, Kassie Sugimoto.

Tribal consultation was conducted by the lead agency, The City of West Covina. Two pieces of State legislation, AB 52 and SB 18, require the City as the Lead Agency under CEQA to consult with interested Native American tribal representatives regarding the proposed Project. On August 1, 2018 the City sent formal written notices to 15 tribal representatives requesting consultation under SB 18, and on August 8, 2018 sent notices to two tribal representatives that had previously requested notice of projects under AB 52. Table 4.15-1 presents the results of the tribal consultation noticing process.

An online paleontological records search and literature review were conducted to determine if any fossil localities have been recorded in Project area or in the general vicinity. Sources for the records search included the PaleoBiology Database (Paleobiology Database 2018) and the University of California Museum of Paleontology NEOMAP Database (2018).

PREHISTORIC AND HISTORIC BACKGROUND

Geologic Setting

The Project area is located near the northern end of a large geomorphic province of southern California, which is characterized by the presence of numerous, northwestern trending, small mountains ranges and intervening plains and valleys, referred to as the Peninsular Ranges. The Peninsular Ranges province abuts to the north a series of east-west trending mountain ranges, collectively referred to as the Transverse

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Ranges. The site lies approximately 6 miles south of the base of the San Gabriel Mountains, which make up the central portion of the Transverse Ranges. The San Gabriel Mountains are composed predominately of a core of relatively old metamorphic rocks consisting of gneiss and schist, with lesser intrusive plutonic rocks, predominately of tonalite composition. These rocks have been pushed up by thrust movement along the Cucamonga fault zone, which lies at the southern base of these mountains. The erosion of these ranges has deposited a very thick blanket of relatively recent, coarse grained alluvial sediments, consisting of boulders, cobbles, gravel, sand, silt and lesser clays. These units tend to become finer grained away from the source, with the large boulder- gravel deposits confined to near the base of the mountains and the silty to sandy units lying towards the far southern end of the basin (LOR 2015b).

The sand and gravel of the Quaternary young alluvial fan deposit, unit 3 underlies the Project area (Morton et al. 2006). These sediments consist of loosely consolidated alluvial gravel, sand, and silt originating from the San Gabriel Mountains. Because of its young age (i.e., very late Holocene or modern), the potential for yielding significant paleontological resources is very low. Quaternary old alluvial fan deposits may be encountered during deeper excavations. These sediments increase in age with depth, perhaps to early-late Pleistocene (older than 100,000 years) age. Elsewhere in the Los Angeles Basin, fossils are known from pit excavations for roads, housing projects, and quarries in similar deposits (Miller 1971). Remains of extinct Ice Age animals (such as mastodons, mammoths, horses, bison, camels, tapirs, sabertooth cats, sloths) have been located during earth-moving activities in these formations.

Ethnographic Setting

The city of West Covina is located within Los Angeles County. During prehistoric times, the area was occupied by the Gabrielino/ Tongva as early as 500 BC in large, permanent villages in the fertile lowlands along rivers and streams and in sheltered areas along the coast. The Gabrielino/ Tongva were hunter-gatherers and their territory eventually encompassed the greater Los Angeles Basin including the coast. The processing of food resources was accomplished in a variety of ways: nuts were cracked with hammer stone and anvil; acorns were ground with mortar and pestle; and seeds and berries with mano and metate. Yucca, an important resource in many areas, was eaten by the natives and exploited for its fibers. Gabrielino/ Tongva houses were circular domed structures of willow poles thatched with tule. Gabrielino/ Tongva houses were quite large and could, in some cases, hold fifty individuals. Population estimates for the Gabrielino/ Tongva are estimated around 10,000 prior to European contact.

Prehistoric Setting

The Project area is located within the ancestral territory of the Gabrieliño, or Tongva Indians. Although Kroeber (1925) recorded the territories of Southern California Tribes, the ancient territorial borders remain vague for two reasons: first, territorial boundaries were probably more flexible than rigid (Kroeber 1925) and, secondly, the indigenous borders and land use were not recorded until after European contact destroyed native lifeways. Although firm and defining borders cannot be known, archaeological, ethnographic, and historic evidence exists to support the prehistoric use by the Gabrieliño /Tongva and their neighboring tribes.

Late Pleistocene

Cultural occupations are archaeologically assessed through the presence or absence of time-sensitive cultural resources. Although foraging peoples used the region to hunt and gather resources by the Late Pleistocene (16,000 to 10,000 BP), little archaeological evidence is present to elucidate the lifeways of these early hunter and gatherers. People living in the inland deserts during the Late Pleistocene exploited the many resources provided by local lakes and marshes. However, many of these lakes disappeared when the climate became warmer and drier. The transition into the Early Holocene required people to adapt to

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the changing environment. Instead of hunting large game, people started to exploit the small animal fauna near the marshes. This tradition is often referred to as the Western Stemmed Tradition (also referred to as the Western Pluvial Lakes Tradition or the Lake Mojave Period) and is characterized by the crescents and large stemmed lithic points found in the archaeological record (Sutton 2011b, 2011c).

Early Holocene

Around 6000 B.C. during the Early Holocene, the development of the earliest cultural tradition, known as the San Dieguito culture, arises in the region (Warren 1967). The San Dieguito culture is characterized by flaked volcanic stone tool industry; specifically, the San Dieguito culture is the time period when hunter and gatherers used stemmed projectile points, chipped lunates (crescents), knives, domed scrapers, and hammerstones to process food (Keller and McCarthy 1989; Sutton 2011b, 2011c). Middle Horizon archaeological sites are usually found around or near ancient lake terraces and can be further divided into one of three categorical phases: San Dieguito I represents sites that are located in the desert, whereas San Dieguito II and III sites are found on both sides of the peninsular mountain ranges (Sutton 2011b).

Middle Holocene

The subsequent cultural tradition, La Jolla Complex, added the use of bifacial lithic projectile points, shell middens, and millingstone technologies into coastal and eastern cultural resources. The transition from San Dieguito to La Jolla is still vague, but Sutton (2011a) presents two possible scenarios. First, the San Dieguito people could have ventured to the coast from the desert areas, only to be subsequently replaced by the southern migration of the La Jolla (Encinitas) culture. In this situation, millingstone technology pervaded into the region via the Northern La Jolla peoples. The alternative theory proposes that people originated from the desert and moved west to occupy the coast at an early date. The adaptation of La Jolla culture occurred at a later date when the climate shifted to hotter and drier conditions around 6000 B.P. In this scenario, the use of millingstone technology is perceived as an adaptive response to warmer climatic conditions and a shift to a seed economy.

The shifts in food processing technologies indicate a change in subsistence strategies; although people were still hunting for large game, plant based foods and marine resources became the primary dietary resource (Sutton 2011a). The La Jolla Complex is divided into two sub-categories: La Jolla Pattern (La Jolla I, II, III, and IV), which represents the shellfish subsistence strategies used by coastal people, and The Pauma Pattern, a contemporary eastern variant which relied on small game hunting and seed gathering, such as acorns, as their main subsistence rather than shellfish (Sutton 2011b, 2011c). Sutton's (2011c) argument posits that the development of mortars and pestles during the Middle Holocene are attributed to the year-round exploitation of acorns as a main dietary provision. Additionally, the warmer and drier climate may have been responsible for moving eastern cultural groups toward coastal populations, which is archaeologically represented by the interchange of coastal and eastern cultural traits (Sutton 2011a).

The Late Holocene

Significant social and political changes occurred in all Californian groups during the Late Holocene. In addition to an intensified reliance on acorns throughout California, many groups underwent population spikes and an increase in sociopolitical complexity (Sutton 2011a). Coastal groups, such as the Chumash located on the Santa Barbara coast, developed large sedentary chiefdoms. The inland deserts of Southern California contain less archaeological data dating to the Late Holocene, but the Takic language groups entered the coastal region around 3500 B.P. (Sutton 2010). Sutton (2011a) argues that the diffusion of cultural traits and the expansion of the Takic language into Southern California may have sparked changes in social complexity, such as the development of Chumash Chiefdoms. Evidence of these

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changes, such as the shifts found in Gabrieliño burial practices and subsistence strategies, are found in the archaeological record (Sutton 2011a). The introduction of the Takic linguistic groups into Southern California marks the end of the coastal Encinitas tradition and the beginning of the Del Rey Tradition on the Southern California mainland and Channel Islands.

Although there is much debate surrounding how and why the Takic language spread into southern California, a vast amount of cultural change occurred during this period (Sutton 2009). Around 1250 BP, the proto-Cupan linguistic group, derived from the proto-Gabrieliño language, entered Orange and San Diego Counties near the ancestral lands of the Juaneño, initiating the San Luis Rey tradition (Sutton 2010, 2011a). The Initial San Luis Rey (1250 to 1000 B.P.) tradition refers to the integration of the Takic languages into Southern California which, in turn, initiated the development of new technologies aimed at facilitating hunting subsistence strategies. New settlement patterns are found in the Initial San Luis Rey period, such as the abandonment of La Jolla and Pauma localities and the establishment of new temporary foraging settlements. The Initial San Luis Rey economy relied more on terrestrial resources throughout the year but seasonally exploited coastal resources. The Initial San Luis Rey was contained to the Juaneño territory and did not move south until around 1000 BP (Sutton 2011b).

At around 1000 B.P., the neighboring regions surrounding the Juaneño territory began to adopt the Initial San Luis Rey tradition. The expansion of the Initial San Luis Rey tradition into Luiseño territory marks the transition into San Luis Rey I (Sutton 2010, 2011a, 2011b). The San Luis Rey I tradition is, quintessentially, the cultural diffusion of Initial San Luis Rey traditions into the Encinitas Culture. In other words, the San Luis Rey I changes were sparked by a diffusion of cultural practices rather than population movement. In addition to adopting new subsistence and settlement patterns, people began to create Rancho Bernardo/ Riverside Maze styled rock art (Sutton 2011a); although the exact meaning of these maze images is unknown (McCarthy and Mouriquand 2003), the integration of rock art may be associated with the spread of the Gabrieliño religion, Chingichngish (Sutton 2011b). The San Luis Rey I tradition lasted until 500 B.P., when pottery was added into the coastal and inland Southern California material culture.

At 500 B.P., new forms of technology and settlement patterns occurred in both Initial San Luis Rey and San Luis Rey I; the combined cultural changes formed the subsequent cultural tradition, San Luis Rey II, which lasted from 500 B.P. up until European contact. The foraging settlements found in previous traditions shifted toward large, sedentary seasonal villages to facilitate a collection subsistence strategy; and pottery, ceramic figurines, and pipes emerged in San Luis Rey II (Sutton 2010). The importance of acorns and large game hunting were emphasized, while the exploitation of marine resources waned.

The Late Prehistoric Period includes the first few centuries of early European contact (1542 to 1769 Common Era [CE]); it is also known as the Protohistoric Period due to the low level of interaction between native Californians and Europeans prior to Portolá's overland expedition in 1769. In the few centuries prior to European contact, the archaeological record reveals substantial increases in the indigenous population (Wallace 1955). Some village sites may have contained as many as 1,500 individuals. Apparently, many of these village sites were occupied throughout the year rather than seasonally. This shift in settlement strategy was likely influenced by improved food procurement and storage technology, which enabled population growth and may have helped stimulate changes in sociopolitical organization.

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Historic Setting

Europeans arrived within the region by the 16th century. Spanish explorer Juan Rodriguez Cabrillo made a temporary landfall at the Chumash village of present-day Ventura on October 12, 1542. However, the end of the prehistoric era in Southern California is marked by the arrival of the Gaspar de Portolá overland expedition from New Spain (Mexico) and the founding of the first Spanish settlement at San Diego on July 16, 1769. Two of the 21 Franciscan missions established by the Spanish in Alta California had a profound impact on the Gabrielino/ Tongva people: *Mission San Gabriel Arcángel* and *Mission San Fernando Rey de España*, both in Los Angeles County, which were founded in September 1771 and in 1797, respectively. The Gabrielino/ Tongva were forced to resettle in the vicinity of the two missions and were decimated by the introduction of European diseases, such as measles and small pox, for which they had no immunity.

The Mexican Revolution, beginning in 1821, overthrew Spanish control and established Mexico as the new political power within the region. After Mexico's independence from Spain in 1822, Mexico secularized the Spanish missions in 1833 by repossessing the land and granting the land to soldiers, civil servants, and pioneers. In 1845, the Mexican Governor, Juan Bautista Alvarado, granted 48,780 acres, which included the present-day city of West Covina, to John Rowland and William Workman to raise cattle. Prior to 1900, the City of West Covina consisted of farm land for livestock because the area lacked dependable irrigation. However, the area quickly transitioned to agricultural land after 1903 when a water well with a steam powered pump was added to facilitate irrigation.

During the 1840s, California saw an increasing influx of Anglo-Americans from the eastern United States. The American Period began with Mexico's defeat at the end of the Mexican-American War, resulting in the concession of California to the United States under the Treaty of Guadalupe Hidalgo on February 2, 1848. Only a few days before, gold was discovered on the American River which triggered the California Gold Rush.

Immigration into Southern California, including the area that encompasses the present-day City of West Covina, continued into the early 20th century when viable irrigation made the land desirable for crop farming. The City incorporated in 1923 and remained an agricultural community until the 1950's when landowners began to sell off portions of their lots to developers. During the 1960's, West Covina experienced an influx of residents seeking housing and employment within a flourishing regional community.

Urbanization in the City of West Covina began in earnest in the early 1940's when the first housing tract was developed near the area bound by the Interstate 10, Orange Avenue, and Cameron Avenue. The historic aerials of the Project area illustrate the Project area was used as farmland well into the mid 1950s. By 1955, the community developed a school called Sunset School near the current Project area. Residential communities started to surround the current Project area by 1953, but flourished during the 1960s. By 1965, the areas north and south of the current Project area consisted of residential communities. Farmland within this area disappeared into the quickly growing developed community by the early 1970's.

In the late 1950s, the Immaculate Heart of Mary, an order of Catholic nuns, sent Sister Columba to West Covina with an old Buick and \$25 to build a community hospital. The Sisters used all the property they owned as collateral to purchase land for the hospital. This included their high school, college, library and even the Mother House in Los Angeles. In 1962, the Queen of the Valley Hospital in West Covina formally opened and is now a fully accredited nonprofit, Catholic health care facility (Citrus Valley Medical Center 2018).

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RESULTS

Archaeological Resources

The NRHP database does not contain any archaeological or historic resources within the City of West Covina. The City of West Covina has listed 31 built structures considered historically significant through a 2006 survey assessment commissioned by the City of West Covina. These resources are considered eligible to be listed on the CRHP based on local significance. Of these 31 structures, one property, 1127 W. Merced Avenue, is located within a half mile of the Project area. The structure is a two-story farmhouse built in 1909. The structure contains local significance for embodying the distinctive characteristics of early 20th century farmhouse architecture.

The results of the CHRIS records search identified 6 resources located within 0.5 mile of the Project area (Table 1). All 6 resources are historic structures designated as 1-3 story commercial buildings. No resources were located within the Project boundaries. Additionally, the Project site has not been archaeologically or historically studied. However, 5 studies have been conducted within 0.5 miles of the Project boundaries (Table 2).

TABLE 1
ARCHAEOLOGICAL AND HISTORIC RESOURCES NEAR THE PROJECT SITE

Primary No.	Author (Year)	Description	Age	Location
P-19-188850	Michael Brandman Associates (2010)	Historic Structure: 1-3 Story Commercial Building First Federal Savings & Loan Assn. of Alhambra;	Historic	0.5 mile
P-19-188938	Caltrans (2002)	Historic Structure: 1-3 Story Commercial Building West Covina Dental OHP Property Number - 168178	Historic	0.5 mile
P-19-188939	Caltrans (2002)	Historic Structure: 1-3 Story Commercial Building 2101 W Garvey Ave N	Historic	0.5 mile
P-19-188940	Caltrans (2001)	Historic Structure: 1-3 Story Commercial Building 1647-1649 W Garvey Ave OHP Property Number - 168180	Historic	0.5 mile
P-19-188941	Caltrans (2002)	Historic Structure: 1-3 Story Commercial Building Trophy Center OHP Property Number - 168182	Historic	0.5 mile
P-19-188942	Caltrans (2002)	Historic Structure: 1-3 Story Commercial Building 1618 W. Harbert St. OHP Property Number - 168183	Historic	0.5 mile

TABLE 2
ARCHAEOLOGICAL AND HISTORIC STUDIES NEAR THE PROJECT SITE

Report No.	Author (Year)	Title	Affiliation	Location
LA-02872	Robert J. Wlodarski and Dan Larson (1993)	Department of Transportation Negative Archaeological Survey Report Dpd-ep-25 (revised 2/83) Interstate 10 (i-10) Between Puente Avenue in the City of Baldwin Park on the West, and the Interchange Between I-10 and State Routes 57 (sr 71/interstate 210	Historical, Environmental, Archaeological, Research, Team.	0.5 mile
LA-02985	Chester King (1993)	Observation of Grading at Paramount Ranch Los Angeles County, California.	Topanga Anthropological Consultants.	0.5 mile
LA-07098	Michael Dice (2003)	Records Search Results and Site Visit for Sprint Telecommunications Facility Candidate La59xc009b (car Quest) 1705 Garvey Avenue, West Covina, Los Angeles County, California	Michael Brandman Associates	0.5 mile
LA-10190	Claudia Herbert (2002)	Supplemental Historic Property Survey Report for the I-10 HOV Lane Between I-605 and the SR-57/SR-71/I-210 Interchange in the Cities of Los Angeles, Baldwin Park, West Covina, Covina, San Dimas, and Pomona in Los Angeles County, CA	Caltrans	0.5 mile
LA-10658	Wayne Bonner and Kathleen Crawford (2010)	Cultural Resources Records Search, Site Visit Results, and Direct APE Historic Architectural Assessment for Clearwire Candidate CA-LOS6255C (SILAGI), 1400 West Covina Parkway, West Covina, Los Angeles County, California	Michael Brandman Associates	0.5 mile

Paleontological Resources

Surface sediments at and surrounding the Project area consist of Pleistocene and Holocene alluvial deposits. Deeper excavation that involves disturbance of native soils could result in the disturbance and/or destruction of paleontological resources that may be present. As recommended by the Society of Vertebrate Paleontology, any substantial excavations should be monitored closely to recover any fossil remains, and fossils recovered from such activities should be placed in an accredited scientific institution for the benefit of current and future generations.

Searches of PaleoBioDB, NEOMAP, and a database of Late Pleistocene vertebrate localities for California (Jefferson 1991), which includes institutional records and published references, indicates that no previously recorded fossil localities have been recorded within one mile of the Project area.

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DISCUSSION

According to Appendix G of the State CEQA Guidelines, a project will normally have a significant adverse environmental impact on cultural resources if it will:

Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.

- Would the project cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?
- Would the project cause a substantial adverse change in the significance of a archaeological resource as defined in Section 15064.5?
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
- Disturb any human remains, including those interred outside of formal cemeteries.

Impacts to Historical Resources

As indicated by the West Covina General Plan EIR and SCCIC record check, there are no known historical sites located on the Project area or in the immediately surrounding area. The City of West Covina has listed 31 built structures considered significant through a 2006 survey assessment commissioned by the City of West Covina. These resources are considered eligible to be listed on the California Register of Historic Places (CRHP) based on local significance. Of these 31 structures, one property, 1127 W. Merced Avenue, is located within a half mile of the Project area. The structure is a two-story farmhouse built in 1909. The structure contains local significance for embodying the distinctive characteristics of early 20th century farmhouse architecture. However, the Project will not impose a direct or indirect effect on the property. Since there are no other known historic resources located within the Project area, the Project will not cause a substantial change in the significance of a historical resources.

Impacts to Archaeological Resources

As indicated by the West Covina General Plan EIR and the SCCIC record check, there are no known archaeological sites located within the Project area or in the immediately surrounding area. 6 resources are located within a half mile of the Project boundaries. However, the Project will not directly or indirectly impact these resources. Since the Project area does not contain any known archaeological resources within or around the Project boundaries, the Project will not cause an adverse change to any known archaeological resources. Although no known resources have been recorded within the Project boundaries, the area was occupied by Gabrieliño tribe during the prehistoric period. As such, any earth-moving activities within alluvial sediment may adversely impact unknown buried archaeological resources. These potential impacts to these resources can be mitigated to a less than significant level with the implementation of mitigating measure CUL-1 and CUL-3.

Impacts to Paleontological Resources

According to the *West Covina General Plan's* Resource Conservation Element, soils and geologic formations within the City, including the Project area, have a low potential to contain significant paleontological resources. Given the documented depth of the Holocene fan deposits, which are too young to contain fossils, paleontological resources are not anticipated to be discovered during excavations within Holocene fan deposits. However, similar to archaeological resources, there is a potential that ground-disturbing activities associated with construction would encounter native soils and previously

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undiscovered paleontological resources. This impact can be mitigated to a less than significant level by implementing of mitigation measure CUL-4.

Impacts to Human Remains

The Project site is fully developed, is largely paved, and has been subject to past disturbance. There are no nearby cemeteries and no human remains are known to be present on the site. Thus, demolition of existing structures and site improvements and construction of the Project is not expected to disturb human remains.

If human remains were found, those remains would require proper treatment, in accordance with applicable laws. Sections 7050.5–7055 of the *California Health and Safety Code* describe the general provisions for human remains. Specifically, Section 7050.5 of the *California Health and Safety Code* describes the protocols to be followed in the event that human remains are accidentally discovered during excavation of a site. In addition, the requirements and procedures set forth in Section 5097.98 of the *California Public Resources Code* would be implemented. If human remains are found during excavation, construction activities must stop in the vicinity of the find and in any area that is reasonably suspected to overlie adjacent remains until the County Coroner has been notified; the remains have been investigated; and appropriate recommendations have been made for the treatment and disposition of the remains. Following compliance with State regulations, which detail the appropriate actions necessary in the event human remains are encountered (refer to mitigating measure CUL-5), potential impacts would be less than significant. No further evaluation of this issue is required in the Draft EIR.

Impacts to Tribal Cultural Resources

The City contacted 15 total tribal representatives representing 11 different tribal groups regarding consultation with the City on the proposed Project, pursuant to both SB 18 and AB 52. Table 3 lists the various tribes and representatives contacted by the City to determine which groups desired to consult with the City. Under SB 18, tribal groups have 90 days to indicate if they want to consult on a project, while tribes under AB 52 have 30 days to indicate a desire to consult. After the close of the 90-day noticing period under SB 18 and the 30-day noticing period under AB 52, no tribal groups expressed a desire to consult with the City on the proposed Project, but one group asked to be contacted if any tribal cultural resources or artifacts were found during grading.

As indicated by the West Covina General Plan EIR (West Covina 2016b) and the archaeological research conducted through the SCCIC, there are no known archaeological or tribal cultural sites located within the Project area or in the immediately surrounding area. According to available information, the potential for Project-related grading to have significant impacts on archaeological or tribal cultural resources is considered low; however, there is a possibility that unknown archaeological or tribal cultural resources may be encountered during grading. This is a potentially significant impact that requires mitigation, which may be mitigated to a less than significant level by implementing TCR-1 and TCR-2.

TABLE 3
NATIVE AMERICAN TRIBAL CONSULTATION

Tribal Group	Date	Contact(s)/Comments	Requirement
Gabrielino/Tongva Tribe	8-1-18	Charles Alvarez – no response	SB 18
Gabrielino/Tongva Nation	8-1-18	Sandonne Guad – no response	SB 18
Gabrielino/Tongva San Gabriel Band of Mission Indians	8-1-18	Anthony Morales – no response	SB 18
Gabrielino Band of Mission Indians – Kizh Nation	8-1-18 and 8-8-18	Andrew Salas/Brandy Salas – Letter dated 8-16-18 indicating a desire to consult, then a follow-up email dated 9-27-18 indicating a decision not to consult unless artifacts were found during grading.	SB 18 and AB 52
Barbareno/Ventureno Band of Mission Indians	8-1-18	Raudel Banuelos, Jr. – no response	SB 18
Barbareno/Ventureno Band of Mission Indians	8-1-18	Elenor Arrellanes – no response	SB 18
Barbareno/Ventureno Band of Mission Indians	8-1-18	Patrick Turnamait – no response	SB 18
Barbareno/Ventureno Band of Mission Indians	8-1-18	Julie Turnamait-Stenslie – no response	SB 18
San Manuel Band of Mission Indians	8-1-18	Lynn Valbuena -no response	SB 18
San Manuel Band of Mission Indians	8-1-18	Lee Claus – no response	SB 18
Soboba Band of Luiseno Indians	8-1-18 and 8-8-18	Joseph Ontiveros – no responses	SB 18 and AB 52
Kitanemuk & Yowlumne Tejon Indians	8-1-18	Delia Dominquez – no response	SB 18
Kern Valley Indian Community	8-1-18	Robert Robinson – no response	SB 18
Fernandeno Tatviam Band of Mission Indians	8-1-18	Rudy Ortega, Jr. – no response	SB 18
Santa Ynez Band of Chumash Indians	8-1-18	Kenneth Kahn – no response	SB 18
NOTE: SB 18 notice to consult period ended October 30 and AB 52 notice to consult period ended August 31.			
Source: City of West Covina Planning Department (see Appendix B)			

CONCLUSION

Direct impacts to on-site cultural resources are site-specific. The proposed Project could lead to accelerated degradation of previously unknown historical, archaeological, tribal, and paleontological resources. As such, impacts may be considered cumulative simply because they relate to the loss of cultural resources in general over time throughout the region. Based on the National Register, there are no cultural resources listed or determined eligible for listing. However, the Project and its surrounding area may contain unknown resources. Should unknown resources be identified, ground disturbance activities could lead to the accelerated degradation of significant cultural resources. These impacts can be reduced to a less than significant level by implementing appropriate mitigation on a project by project basis, similar to those measures recommended for the proposed Project.

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RECOMMENDATIONS

CUL-1 A qualified archaeologist (the “Project Archaeologist”) shall be retained prior to the start of grading for Project-related construction. The Project Archaeologist shall monitor all ground-disturbing activities within the areas of native soil (i.e., below existing areas of artificial fill from previous hospital construction). If archaeological or historical resources are encountered during implementation of any phase of the Project, the Project Archaeologist will be allowed to temporarily divert or redirect grading or excavation activities in the vicinity of the find in order to make an evaluation of the find.

If historical materials are found during grading, a qualified historian (“Project Historian”) shall be retained to evaluate and make appropriate recommendations on the disposition of any historical artifacts in consultation with the City local historical experts as determined appropriate by the City. The disposition of any archaeological resources shall be governed by Mitigation Measure CUL-3.

CUL-2 Prior to the start of any Project-related grading, the following note shall be placed on the Grading Plan:

“If any suspected archaeological resources are discovered during ground-disturbing activities and the archaeological monitor or Tribal representatives are not present, the construction supervisor is obligated to halt work in a 100-foot radius around the find and call the Project Archaeologist [Insert Number] and appropriate Tribal representatives to the site to assess the significance of the find.”

CUL-3 The Project Archaeologist shall monitor Project-related grading as outlined in Mitigation Measure CUL-1. Any archaeological resources are uncovered during the course of Project-related grading shall be recorded and/or removed per applicable guidelines, in consultation and cooperation with the City, the South Central Coastal Information Center Staff (located at Cal State Fullerton) and appropriate Native American tribal representatives.

If a significant archaeological resource(s) is discovered on the property, ground disturbing activities shall be suspended 100 feet around the resource(s). The archaeological monitor and representatives of the appropriate Native American Tribe(s), Hospital Staff, and the City Planning Department shall confer regarding mitigation of the discovered resource(s). A treatment plan and/or preservation plan shall be prepared and by the archaeological monitor and reviewed by representatives of the appropriate Native American Tribe(s), Hospital Staff, and the City Planning Department and implemented by the archaeologist to protect the identified archaeological resource(s) from damage and destruction.

The Hospital shall relinquish ownership of all archaeological artifacts that are of Native American origin found on the Project site to the culturally affiliated Native American tribe(s) for proper treatment and disposition. A final report containing the significance and treatment findings shall be prepared by the archaeologist and submitted to the City Planning Department, the appropriate Native American tribe(s), and the South Central Coastal Information Center. All cultural material, excluding sacred, ceremonial, grave goods and human remains, collected during the grading monitoring program and from any previous archaeological studies or excavations on the Project site shall be curated, as

determined by the treatment plan, according to the current professional repository standards and may include a culturally affiliated tribal curatorial facility.

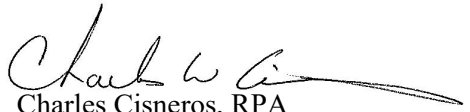
- CUL-4** A qualified Paleontologist (the “Project Paleontologist”) shall be retained prior to the start of grading for any Project-related construction. Also prior to the start of grading, the Project Paleontologist shall review the grading plan to identify any areas where excavation will occur in native soils that could contain fossils (i.e., older Quaternary alluvium). The Project Paleontologist shall monitor all ground-disturbing activities in those areas and prepare a brief memo report on monitoring activities during that time. If fossiliferous materials are found during grading in other (i.e., non-marked) areas, work shall be halted until the Project Paleontologist is contacted and can evaluate the find and determine an appropriate course of action to protect significant paleontological resources.
- CUL-5** If human remains are encountered during any Project-related ground-disturbing activities, Section 7050.5 of the *California Health and Safety Code* states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition of the materials pursuant to Section 5097.98 of the *California Public Resources Code*. The provisions of Section 15064.5 of the California Environmental Quality Act Guidelines shall also be followed. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner shall notify the Native American Heritage Commission (NAHC). The NAHC will determine and notify a Most Likely Descendent (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The descendent must complete the inspection within 24 hours of notification by the NAHC. The MLD may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. These requirements shall be included as notes on the contractor specification and verified by the Community Development Department, prior to issuance of grading permits. This measure shall be implemented to the satisfaction of the City in consultation with the County Coroner.
- TCR-1** Prior to the start of grading for each phase of the Project, the Queen of the Valley Hospital shall enter into a Cultural Resources Monitoring Agreement with qualified Tribal representatives, and that a professional archaeological monitor meeting Secretary of Interior standards has been retained to conduct monitoring of all grading activities and has the authority to temporarily halt and redirect earthmoving activities in the event that suspected archaeological resources are unearthed during Project construction. The Project Archaeologist and Tribal representatives shall attend any pre-grading meetings with the City and contractors to explain and coordinate the requirements of the monitoring program for each phase of Project work as appropriate.
- TCR-2** During all Project-related grading activities, the City, Queen of the Valley Hospital representatives, Project Archaeologist, and the Tribal representative(s) shall be allowed to monitor and have received a minimum of 30 days advance notice of all grading and trenching activities. The Project Archaeological Monitor shall observe all mass grading and trenching activities per the Cultural Resources Monitoring Agreement. If the Tribal representatives suspect that an archaeological resource may have been unearthed, the archaeologist, in consultation with the tribal representative, shall immediately halt and redirect grading operations in a 100-foot radius around the find to allow identification and evaluation of the suspected resource. In consultation with the appropriate Native American Tribe(s), the archaeological monitor shall evaluate the suspected resource and

Jeff Anderson
February 6, 2019
Page 14

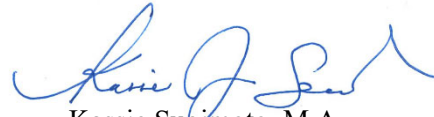
make a determination of significance pursuant to California Public Resources Code Section 21083.2.

Sincerely,


P S O M A S



Charles Cisneros, RPA
Senior Archaeologist/Project Manager



Kassie Sugimoto, M.A.
Archaeologist



Melissa Macias
Paleontologist

Attachments: Exhibit 1 – Project Location

R:\Projects\WCO\3WCO010100\Tech Studies\Cultural\Cultural Memo_Public-020619.docx

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Jeff Anderson
February 6, 2019
Page 15

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State of California -- The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
LOCATION MAP

Primary #
HRI #
Trinomial

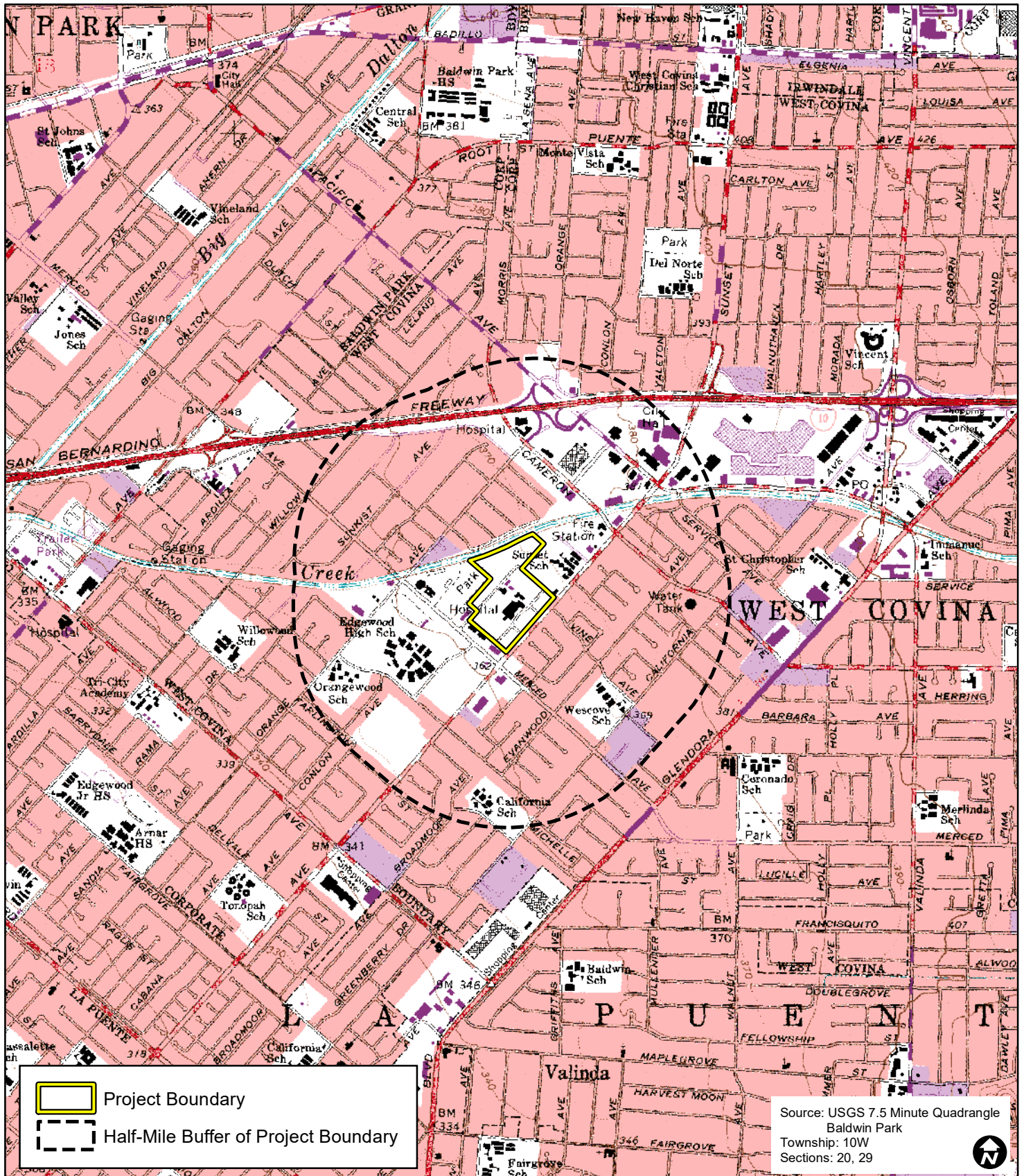
Page 1 of 1

*Resource Name or #: _____

*Map Name: Baldwin Park

*Scale: 1:24,000

*Date of Map: Digital 2014





Planning Department

August 1, 2018

Gabrielino-Tongva Tribe
Charles Alvarez, Councilmember
23454 Vanowen Street
West Hills, CA 91307

RE: INVITATION TO CONSULT UNDER SENATE BILL 18

Zone Change (ZC No. 17-02) proposing to change the to a new Specific Plan for Queen of the Valley Hospital

This letter formally invites you to request consultation pursuant to Senate Bill 18 (Government Code Section 65352.3) regarding the proposed project. SB 18 requires local governments to consult with California Native American Tribes about proposed local land use decisions for protecting traditional tribal cultural places and sacred sites. The Project proposes a specific plan and therefore is subject to the requirements of SB 18. The City of West Covina is the lead agency pursuant to the California Environmental Quality Act (CEQA) for the proposed Project.

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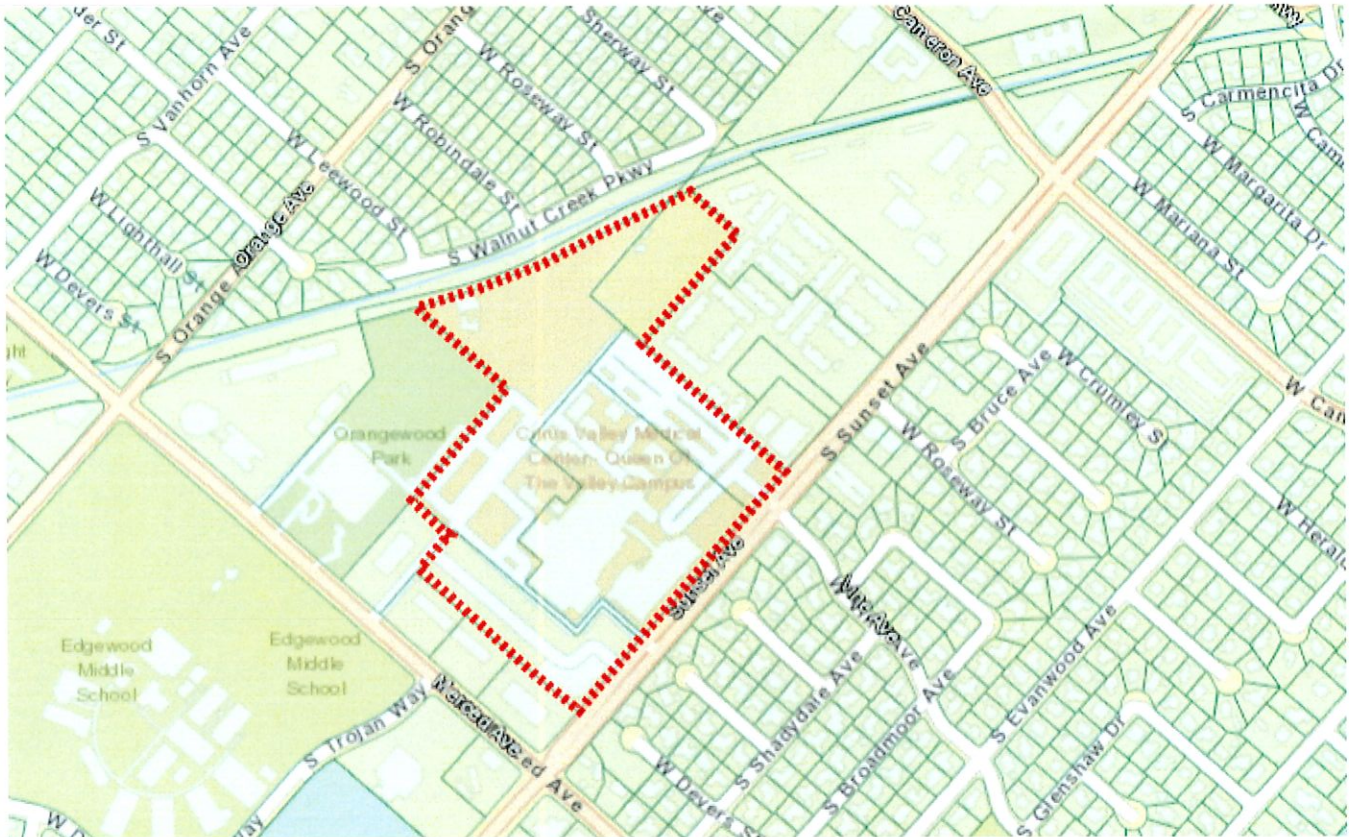
Please direct your correspondence to Jeff Anderson, Planning Director at the address listed in the letterhead or by e-mail at jeff.anderson@westcovina.org.

Respectfully submitted,



Jeff Anderson
Planning Director

Vicinity Map





Planning Department

August 1, 2018

Barbareno/Ventureno Band of Mission Indians
Raudel Joe Banuelos, Jr.
331 Mira Flores Court
Camarillo, CA 93012

RE: INVITATION TO CONSULT UNDER SENATE BILL 18

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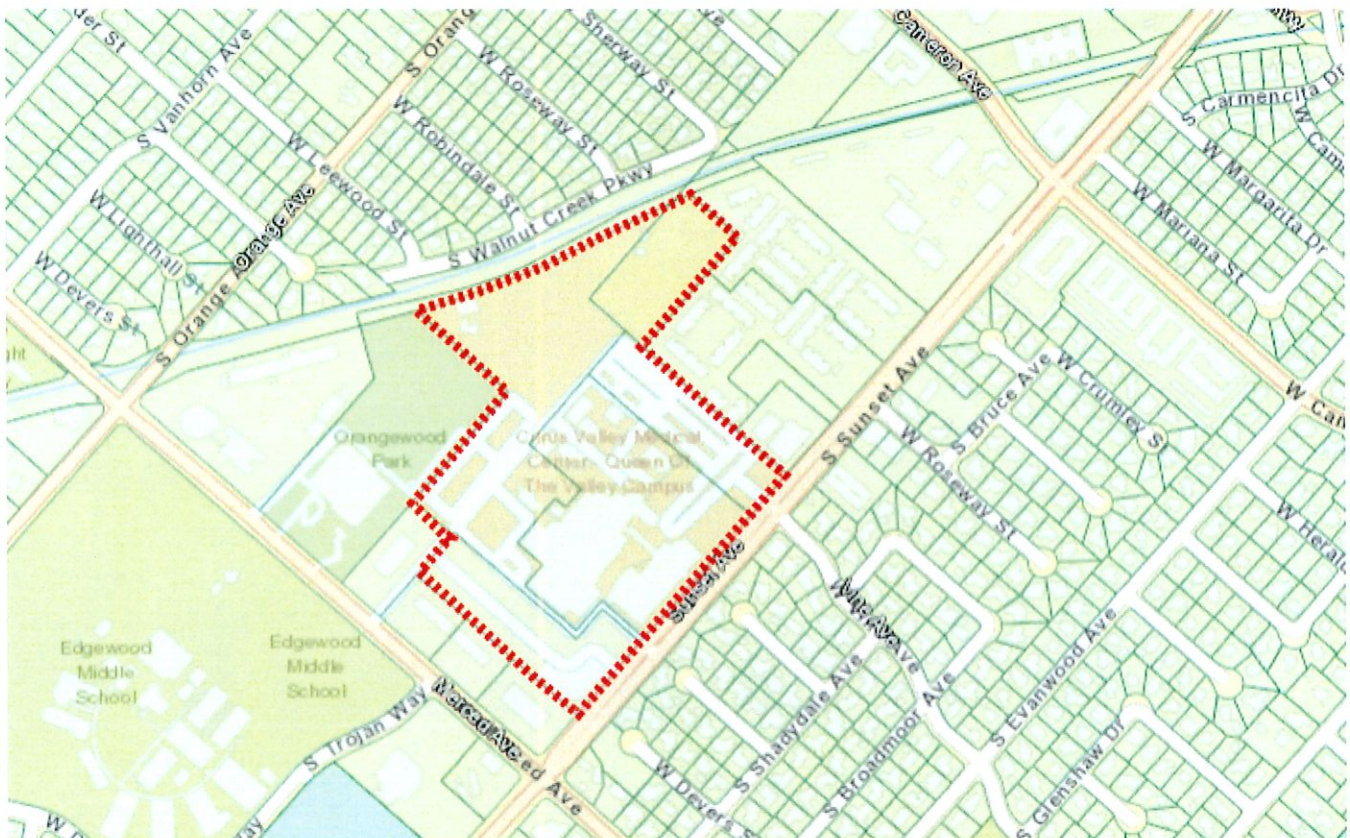
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Respectfully submitted,


Jeff Anderson
Planning Director

Vicinity Map





Planning Department

August 1, 2018

Barbareno/Ventureno Band of Mission Indians
Eleanor Arrellanes
P.O. Box 5687
Ventura, CA 93005

RE: INVITATION TO CONSULT UNDER SENATE BILL 18

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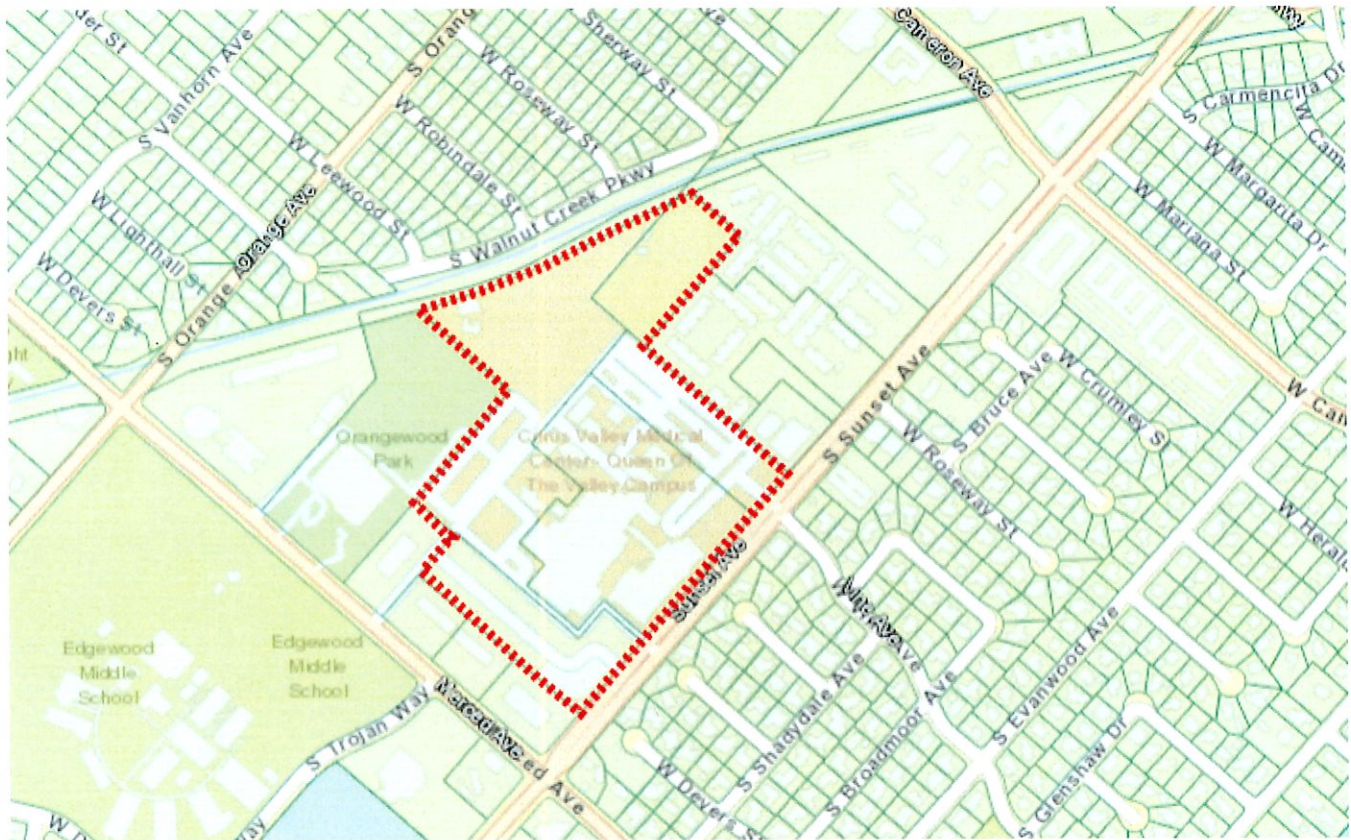
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Respectfully submitted,

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Gabrieleno Band of Mission Indians – Kizh Nation
Andrew Salas, Chairperson
P.O. Box 393
Covina, CA 91723

Zone Change (ZC No. 17-02) proposing to change the to a new Specific Plan for Queen of the Valley Hospital

1444 W. Garvey Avenue South Room 208 • West Covina, CA 91790 • Phone (626) 939-8422 • Fax (626) 939-8667
Case Files ZONE C-MAGE 2012C-102 Queen of Valley campus, CA 91790 • Phone (626) 939-8422 • Fax (626) 939-8667

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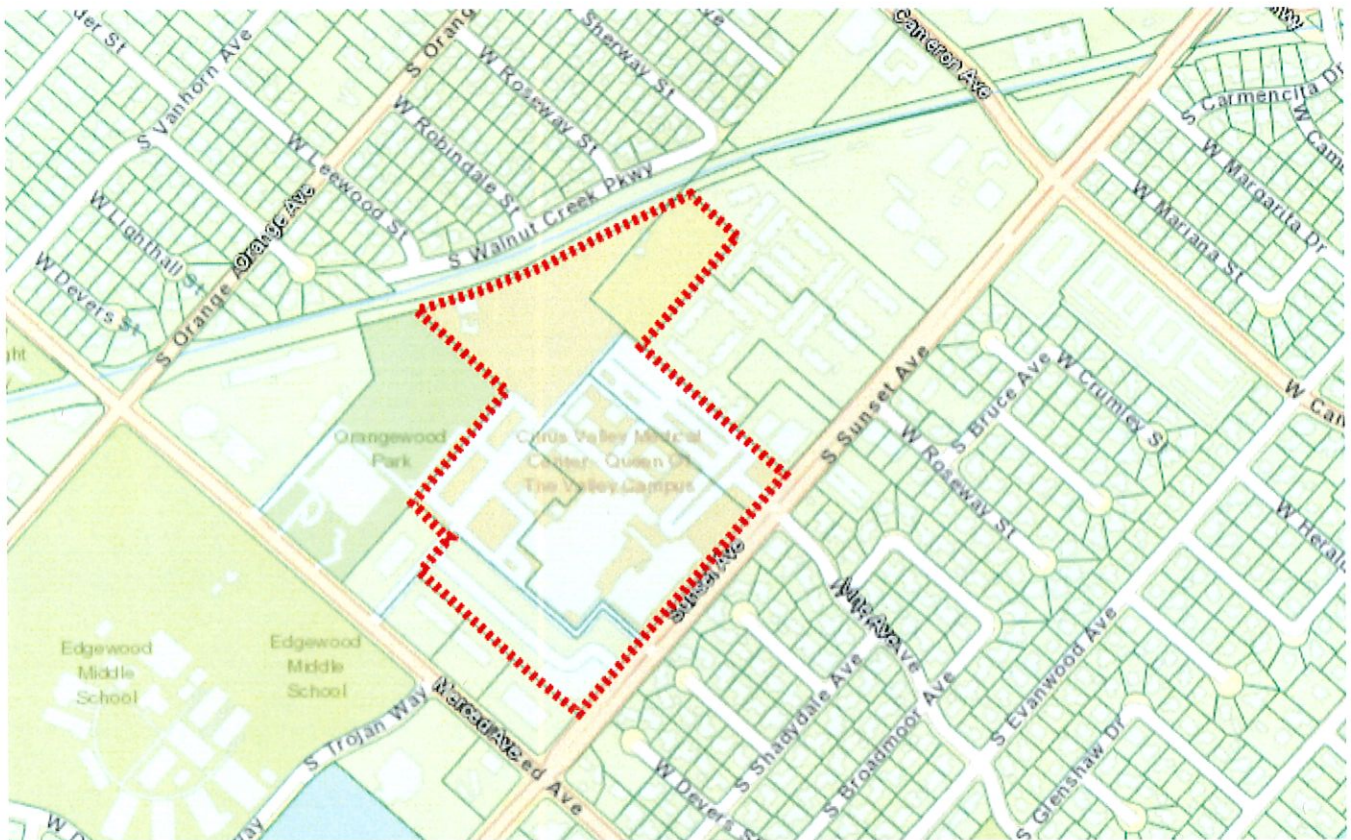
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Respectfully submitted,



Jeff Anderson
Planning Director

Vicinity Map





Planning Department

August 1, 2018

San Manuel Band of Mission Indians
Lynn Valbuena
26569 Community Center Drive
Highland, CA 92346

RE: INVITATION TO CONSULT UNDER SENATE BILL 18

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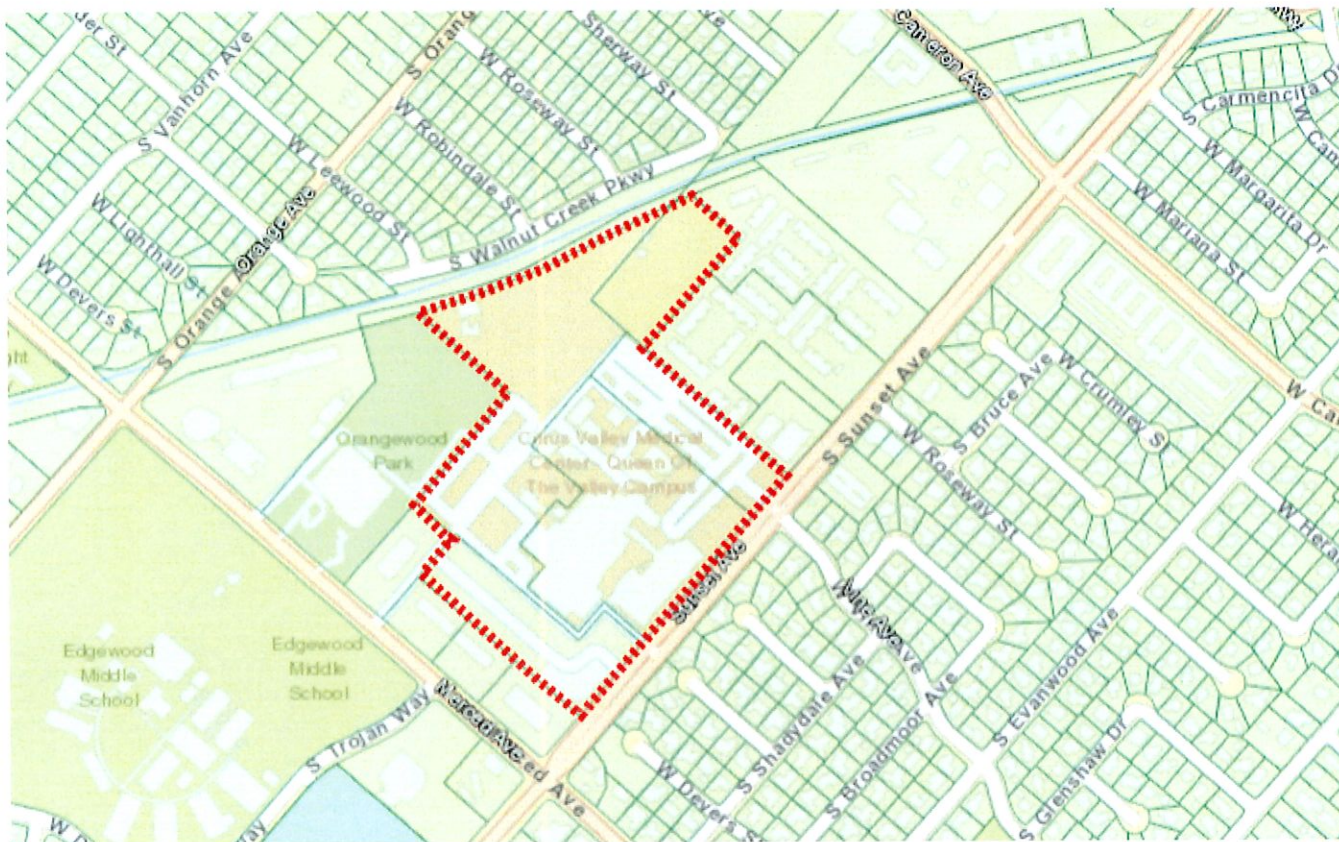
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Respectfully submitted,



Jeff Anderson
Planning Director

Vicinity Map





Planning Department

August 1, 2018

Soboba Band of Luiseno Indians
Joseph Ontiveros, Cultural Resource Department
P.O. Box 487
San Jacinto, CA 92581

RE: INVITATION TO CONSULT UNDER SENATE BILL 18

Zone Change (ZC No. 17-02) proposing to change the to a new Specific Plan for Queen of the Valley Hospital

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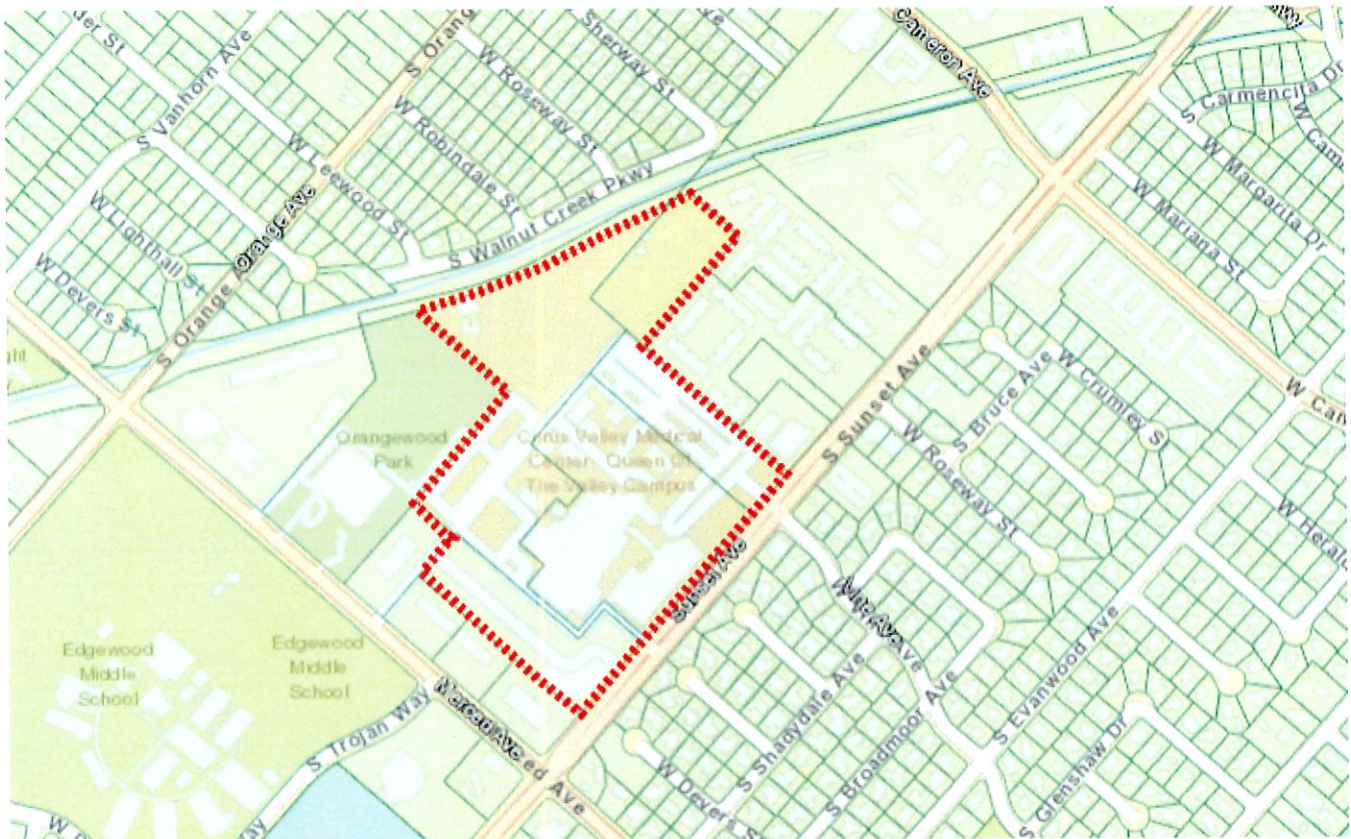
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Respectfully submitted,


Jeff Anderson
Planning Director

Vicinity Map





Planning Department

August 1, 2018

Kitanemuk & Yowlumne Tejon Indians
Delia Dominguez, Chairperson
114 Radio Street
Bakersfield, CA 93305

RE: INVITATION TO CONSULT UNDER SENATE BILL 18

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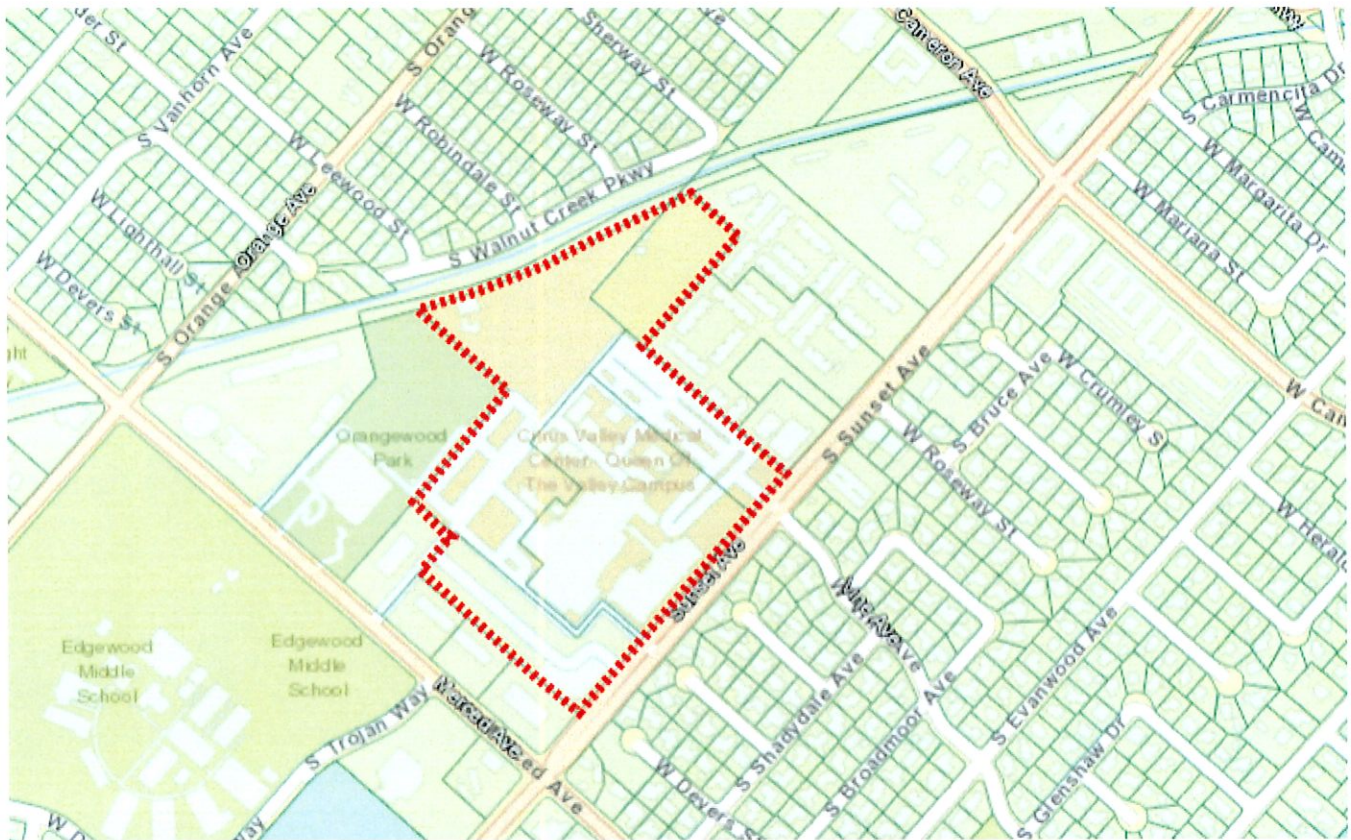
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Respectfully submitted,



Vicinity Map





Planning Department

August 1, 2018

Kern Valley Indian Community
Robert Robinson, Chairperson
P.O. Box 1010
Lake Isabella, CA 93283

RE: INVITATION TO CONSULT UNDER SENATE BILL 18

Zone Change (ZC No. 17-02) proposing to change the to a new Specific Plan for Queen of the Valley Hospital

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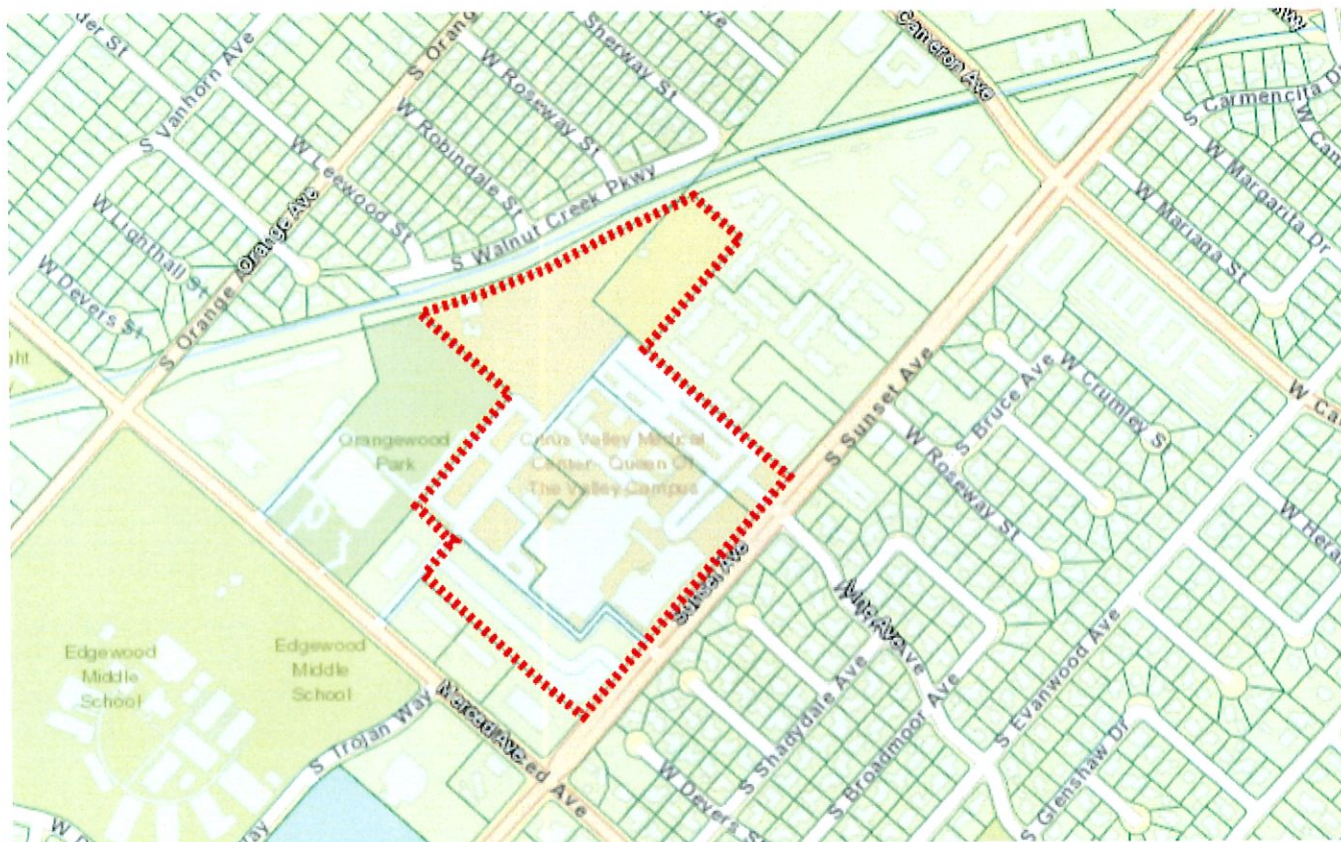
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Jeff Anderson
Planning Director

Vicinity Map





Planning Department

August 1, 2018

Barbareno/Ventureno Band of Mission Indians
Patrick Turnamait
992 El Camino Corto
Ojai, CA 93023

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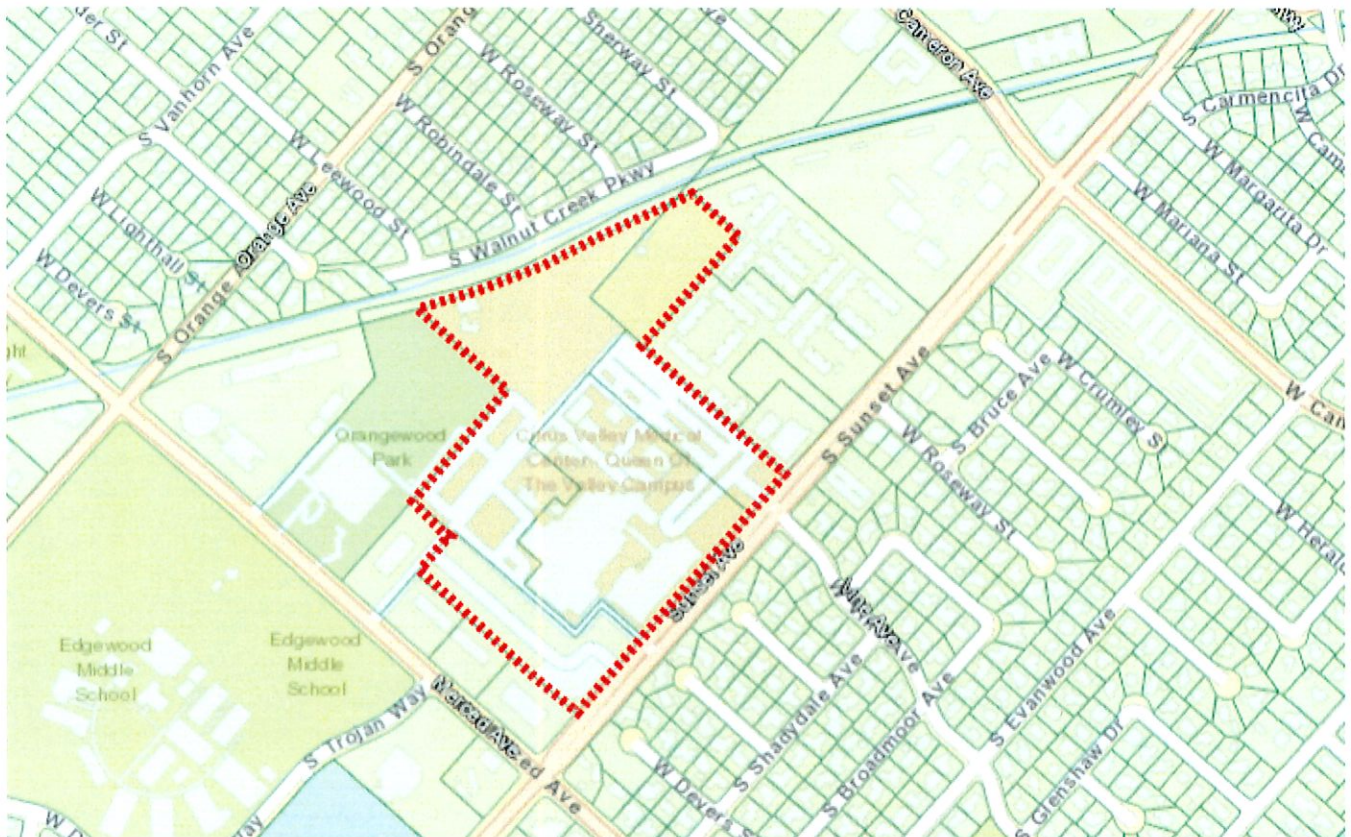
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Vicinity Map





Planning Department

August 1, 2018

San Manuel Band of Mission Indians
Lee Claus, Director-CRM Dept.
26569 Community Center Drive
Highland, CA 92346

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The intent of consultation is to provide an opportunity for local governments and interested tribes to work together early in the planning process. Early consultation will assist in the protection of tribal cultural places that might not appear on cultural registries. This notice represents your opportunity to participate in the projects for this project. SB 18 defines tribal cultural places as:

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The City would welcome a response at your earliest convenience, but no later than 90 days after receiving this letter. Under SB 18, if your tribe requests to participate in the consultation process, any sensitive information shared with the City regarding cultural places and/or sacred sites will

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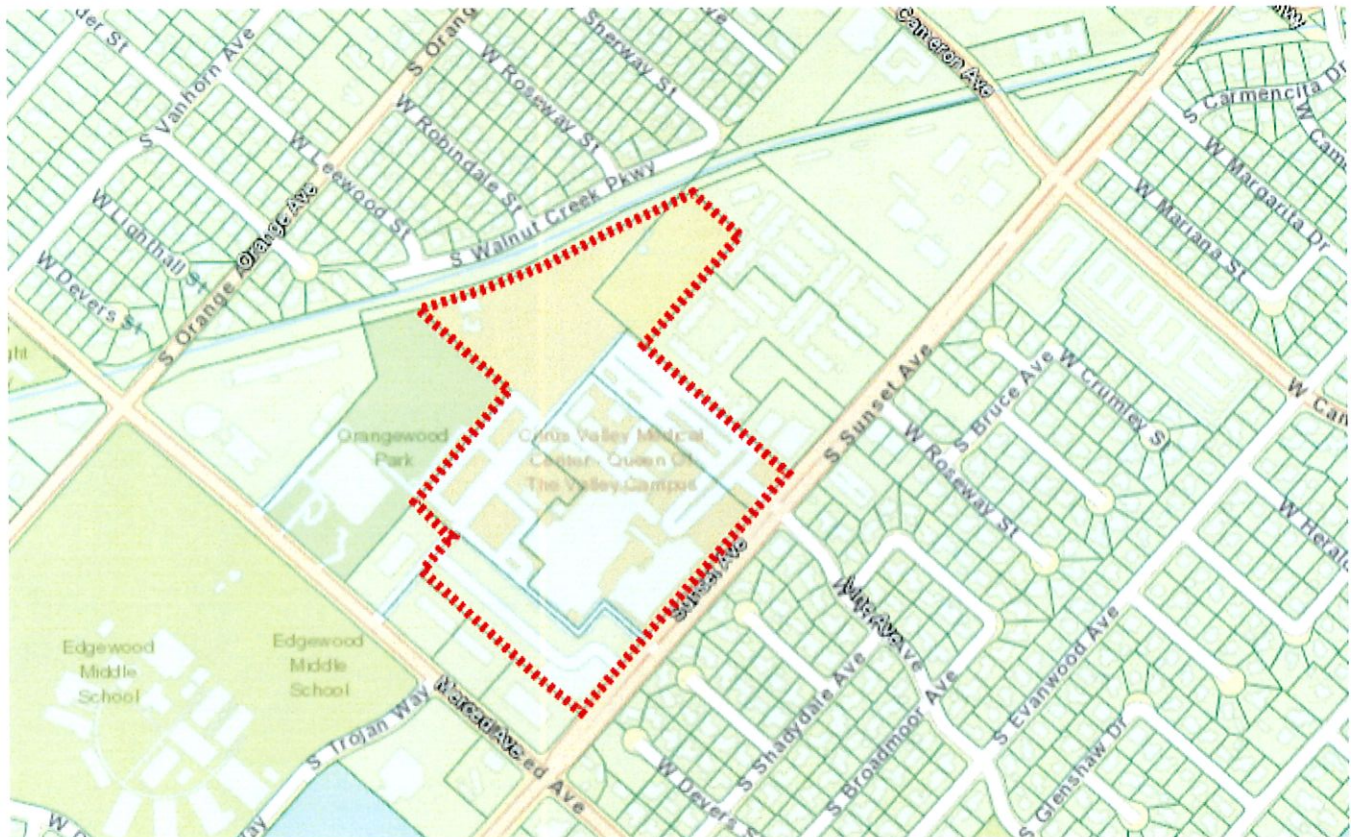
Please direct your correspondence to Jeff Anderson, Planning Director at the address listed in the letterhead or by e-mail at jeff.anderson@westcovina.org.

Respectfully submitted,



Jeff Anderson
Planning Director

Vicinity Map





Planning Department

August 1, 2018

Barbareno/Ventureno Band of Mission Indians
Julie Lynn Tumamait-Stenslie, Chair
265 North Poli Avenue
Ojai, CA 93023

RE: INVITATION TO CONSULT UNDER SENATE BILL 18

Zone Change (ZC No. 17-02) proposing to change the to a new Specific Plan for Queen of the Valley Hospital

This letter formally invites you to request consultation pursuant to Senate Bill 18 (Government Code Section 65352.3) regarding the proposed project. SB 18 requires local governments to consult with California Native American Tribes about proposed local land use decisions for protecting traditional tribal cultural places and sacred sites. The Project proposes a specific plan and therefore is subject to the requirements of SB 18. The City of West Covina is the lead agency pursuant to the California Environmental Quality Act (CEQA) for the proposed Project.

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Planning Department

August 1, 2018

Gabrielino/Tongva Nation
Sandonne Goad, Chairperson
106 ½ Judge John Also Street, #231
Los Angeles, CA 90012

RE: INVITATION TO CONSULT UNDER SENATE BILL 18

Zone Change (ZC No. 17-02) proposing to change the to a new Specific Plan for Queen of the Valley Hospital

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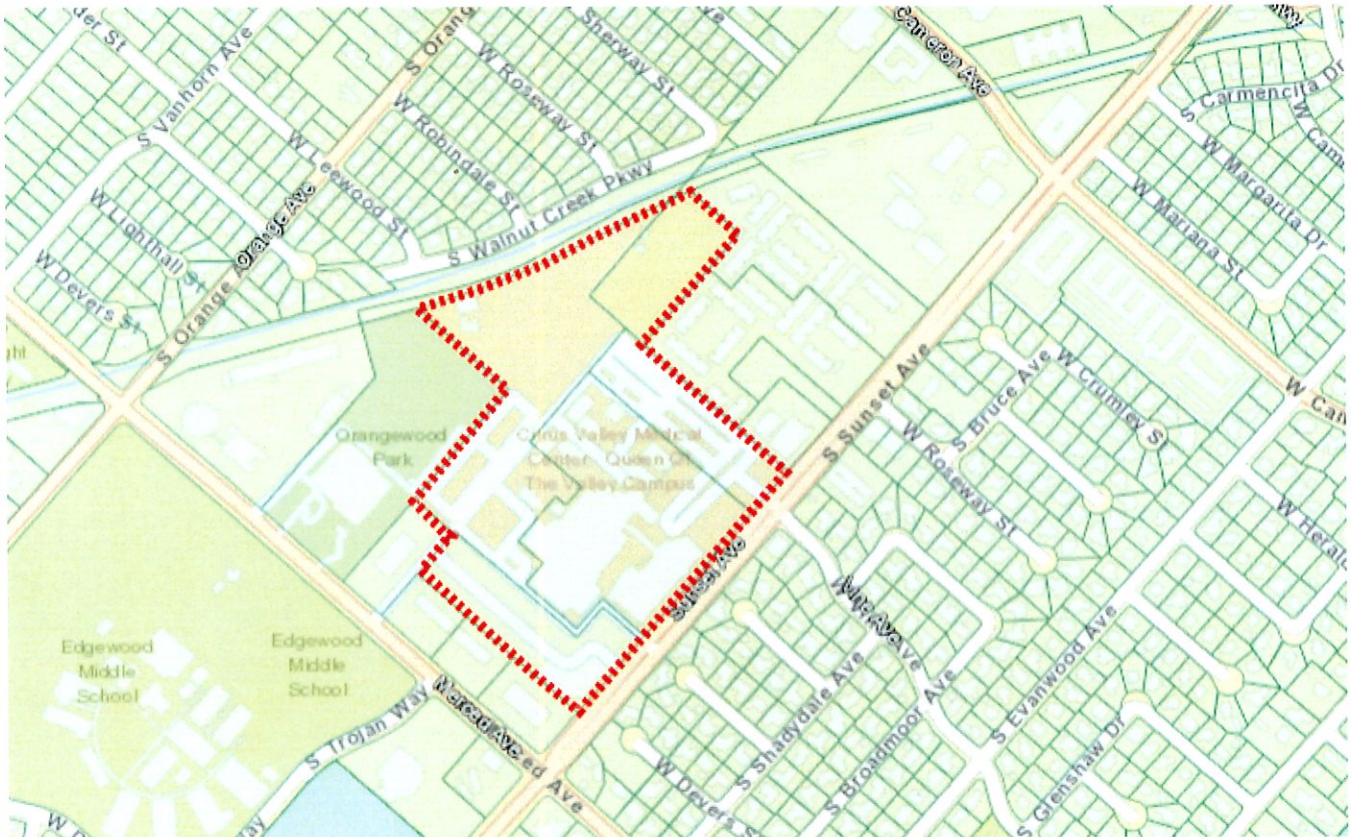
Please direct your correspondence to Jeff Anderson, Planning Director at the address listed in the letterhead or by e-mail at jeff.anderson@westcovina.org.

Respectfully submitted,



Jeff Anderson
Planning Director

Vicinity Map





Planning Department

August 1, 2018

Fernandeno Tatviam Band of Mission Indians
Rudy Ortega, Jr. Tribal President
1019 Second Street, Suite 1
San Fernando, CA 91340

RE: INVITATION TO CONSULT UNDER SENATE BILL 18

Zone Change (ZC No. 17-02) proposing to change the to a new Specific Plan for Queen of the Valley Hospital

This letter formally invites you to request consultation pursuant to Senate Bill 18 (Government Code Section 65352.3) regarding the proposed project. SB 18 requires local governments to consult with California Native American Tribes about proposed local land use decisions for protecting traditional tribal cultural places and sacred sites. The Project proposes a specific plan and therefore is subject to the requirements of SB 18. The City of West Covina is the lead agency pursuant to the California Environmental Quality Act (CEQA) for the proposed Project.

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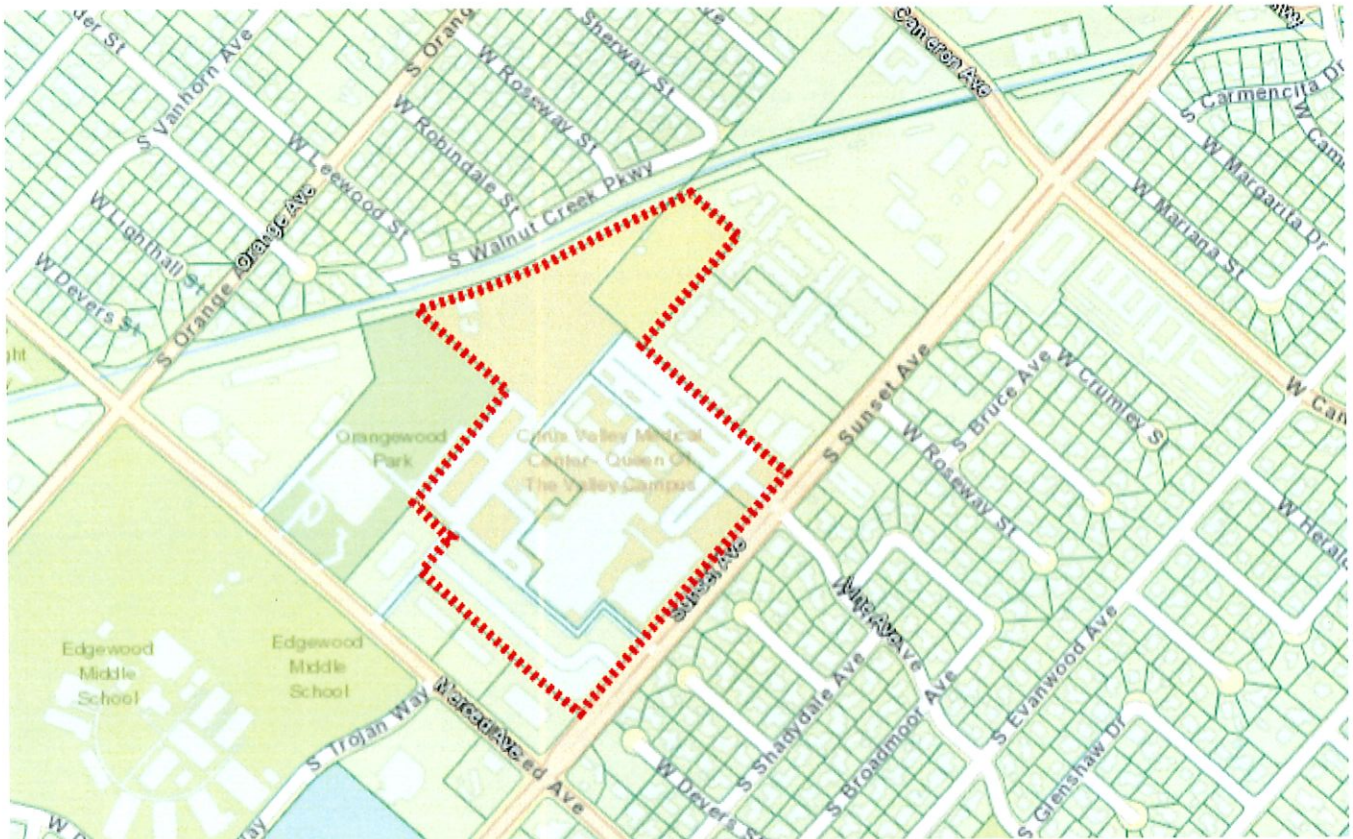
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Respectfully submitted,



Vicinity Map





Planning Department

August 1, 2018

Gabrieleno/Tongva San Gabriel Band of Mission Indians
Anthony Morales, Chairperson
Post Office Box 693
San Gabriel, CA 91778

RE: INVITATION TO CONSULT UNDER SENATE BILL 18

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This letter formally invites you to request consultation pursuant to Senate Bill 18 (Government Code Section 65352.3) regarding the proposed project. SB 18 requires local governments to consult with California Native American Tribes about proposed local land use decisions for protecting traditional tribal cultural places and sacred sites. The Project proposes a specific plan and therefore is subject to the requirements of SB 18. The City of West Covina is the lead agency pursuant to the California Environmental Quality Act (CEQA) for the proposed Project.

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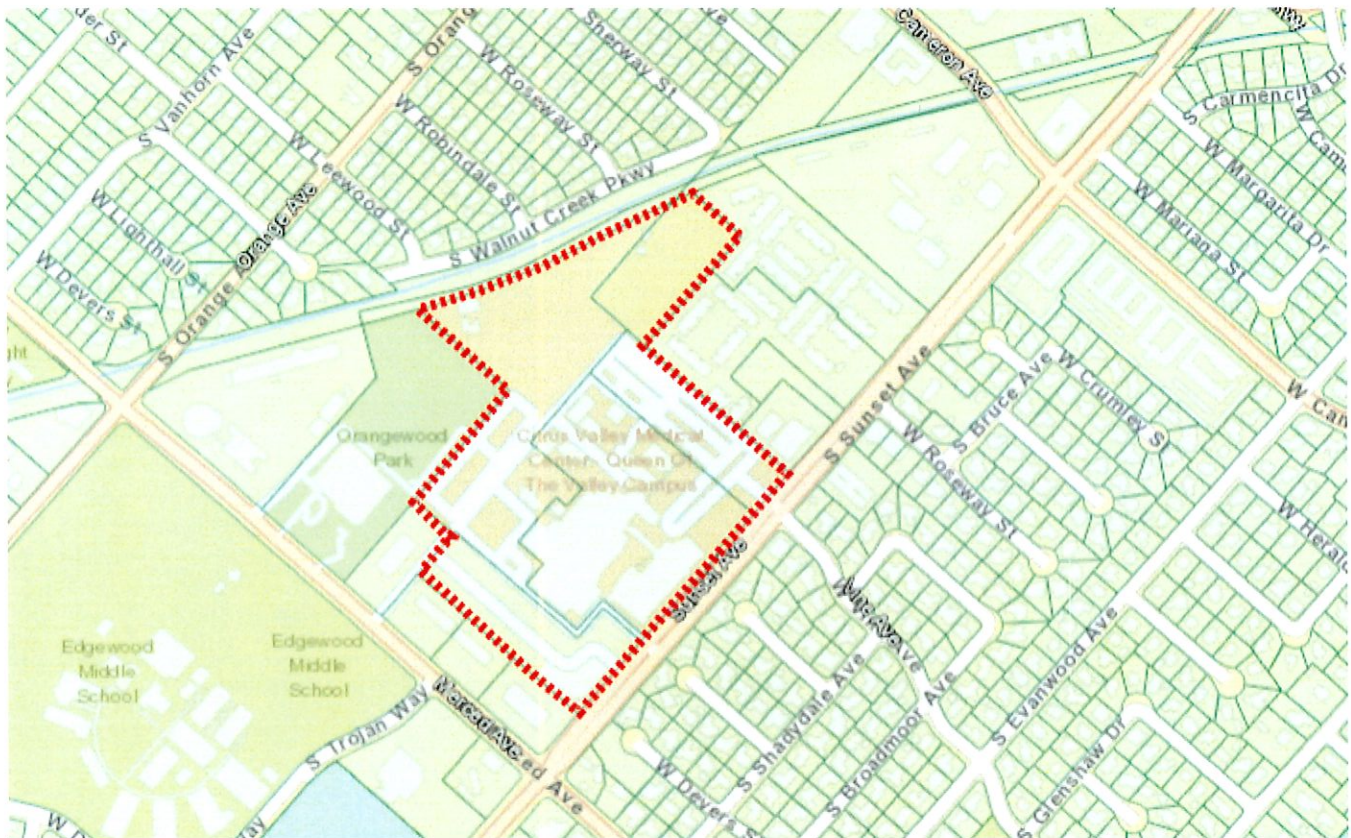
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Respectfully submitted,



Vicinity Map





Planning Department

August 1, 2018

Santa Ynez Band of Chumash Indians
Kenneth Kahn, Chairperson
PO Box 517
Santa Ynez, CA 93460

RE: INVITATION TO CONSULT UNDER SENATE BILL 18

Zone Change (ZC No. 17-02) proposing to change the to a new Specific Plan for Queen of the Valley Hospital

Dear Mr. Khan:

This letter formally invites you to request consultation pursuant to Senate Bill 18 (Government Code Section 65352.3) regarding the proposed project. SB 18 requires local governments to consult with California Native American Tribes about proposed local land use decisions for protecting traditional tribal cultural places and sacred sites. The Project proposes a specific plan and therefore is subject to the requirements of SB 18. The City of West Covina is the lead agency pursuant to the California Environmental Quality Act (CEQA) for the proposed Project.

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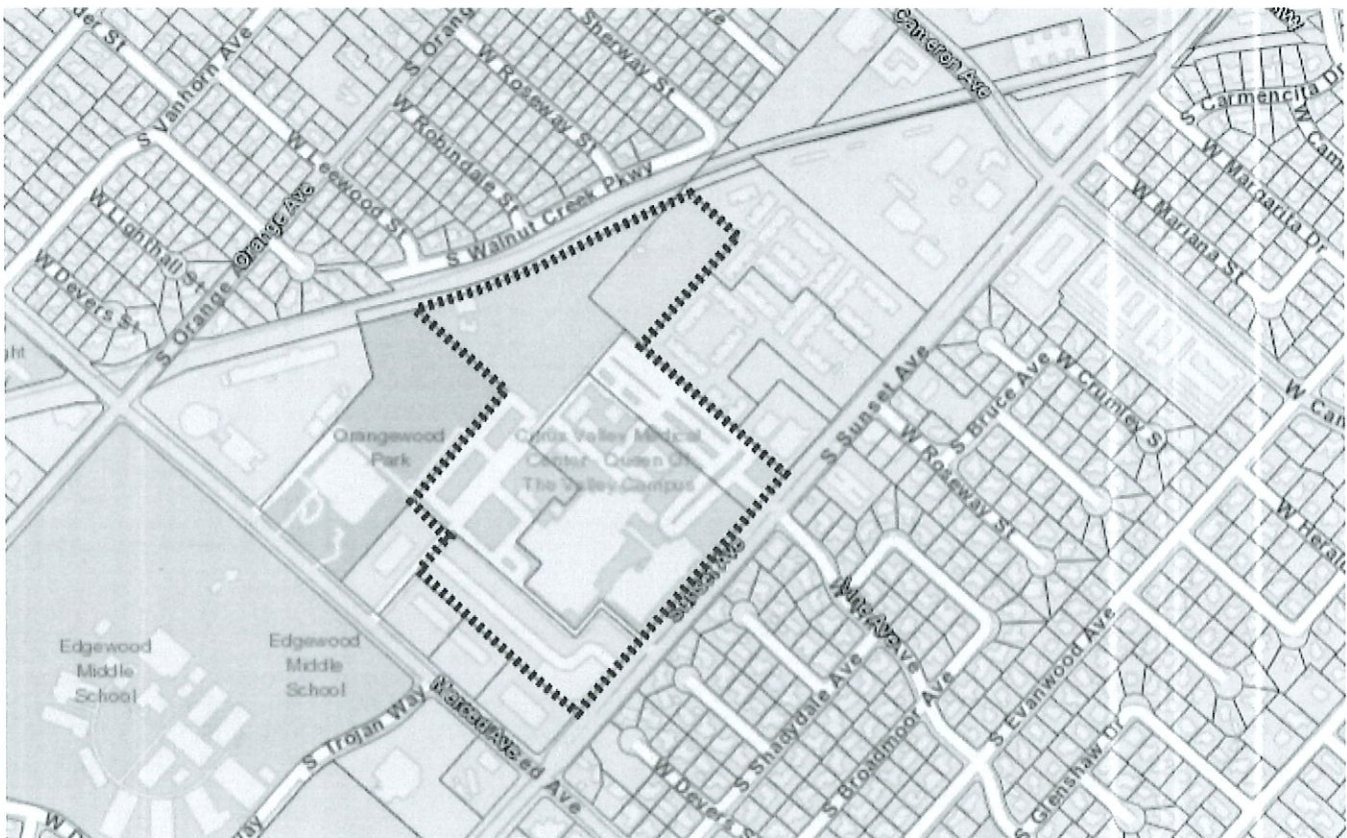
Please direct your correspondence to Jeff Anderson, Planning Director at the address listed in the letterhead or by e-mail at jeff.anderson@westcovina.org.

Respectfully submitted,



Jeff Anderson
Planning Director

Vicinity Map





Andrew Salas
Gabrieleno Band of Mission Indians – Kizh Nation
P.O. Box 393
Covina, CA 91723

Re: AB-52 Consultation with the Gabrieleno Band of Mission Indians for a new Specific Plan for the Queen of the Valley Hospital campus at 1115 S. Sunset Avenue.

Dear Mr. Salas,

The City of West Covina is conducting its AB 52 consultation process for the preparation of a Specific Plan for Queen of the Valley Hospital. Please consider this letter and preliminary project information as the initiation of the California Environmental Quality Act, specifically Public Resources Code 21080.3.1 and Chapter 532 Statutes of 2014 (i.e., AB 52). Please respond within 30 days of receiving this letter, pursuant to PRC 21080.3.1(d), if you would like to consult on this project.

Project Title: Queen of the Valley Specific Plan

Project Location: The project site is located at 1115 S. Sunset Avenue.

Project Description: The project consists of a zone change application in context with the development of a Specific Plan to plan for and guide improvements to the 21-acre Queen of the Valley Hospital. The property is improved with Queen of the Valley Hospital, medical offices, surface parking, and a lot historically used as a youth baseball field. New construction will include emergency department expansion, ICU, nursing unit, surgery and support services. The project site has a current General Plan land use designation of Commercial and Parks and Open Space. The site is currently zoned with a Specific Plan adopted in 1987.

Any comments or concerns you may have about this project are important to the City of West Covina and will be considered in moving forward with this project. If you have any questions or concerns with the project, please contact me at jeff.anderson@westcovina.org or by phone at (626) 939-8423.

Page 2

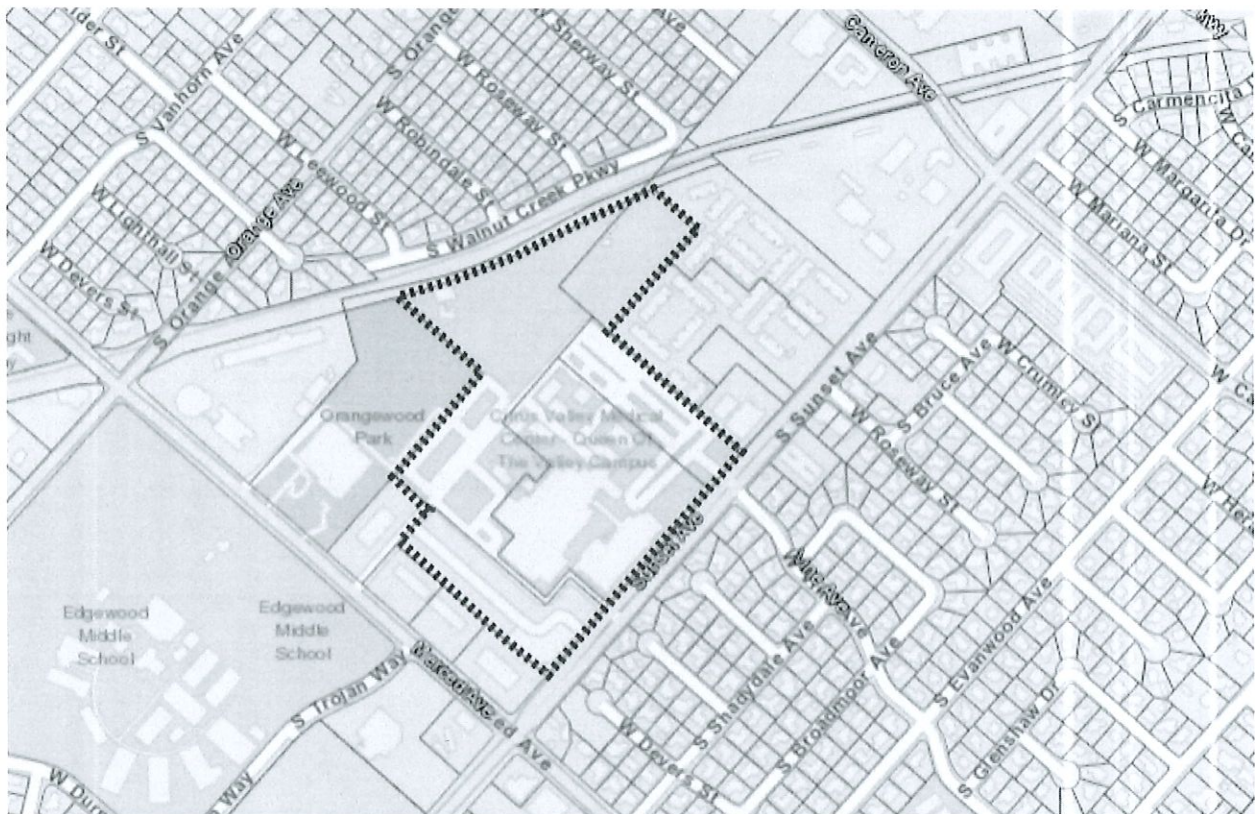
Please be advised that the Gabrieleno Band of Mission Indians has 30 days upon receipt of this letter to provide input regarding this project.

Sincerely,


Jeff Anderson

Jeff Anderson
Planning Director

Attachment: Project Location Map





Planning Department

August 8, 2018

Joseph Ontiveros
Cultural Resource Director
Soboba Band of Luiseno Indians
P.O. Box 487
San Jacinto, CA 92581

Re: AB-52 Consultation with the Soboda Band of Luiseno Indians for a new Specific Plan for the Queen of the Valley Hospital campus at 1115 S. Sunset Avenue.

Dear Mr. Ontiveros,

The City of West Covina is conducting its AB 52 consultation process for the preparation of a Specific Plan for Queen of the Valley Hospital. Please consider this letter and preliminary project information as the initiation of the California Environmental Quality Act, specifically Public Resources Code 21080.3.1 and Chapter 532 Statutes of 2014 (i.e., AB 52). Please respond within 30 days of receiving this letter, pursuant to PRC 21080.3.1(d), if you would like to consult on this project.

Project Title: Queen of the Valley Specific Plan

Project Location: The project site is located at 1115 S. Sunset Avenue.

Project Description: The project consists of a zone change application in context with the development of a Specific Plan to plan for and guide improvements to the 21-acre Queen of the Valley Hospital. The property is improved with Queen of the Valley Hospital, medical offices, surface parking, and a lot historically used as a youth baseball field. New construction will include emergency department expansion, ICU, nursing unit, surgery and support services. The project site has a current General Plan land use designation of Commercial and Parks and Open Space. The site is currently zoned with a Specific Plan adopted in 1987.

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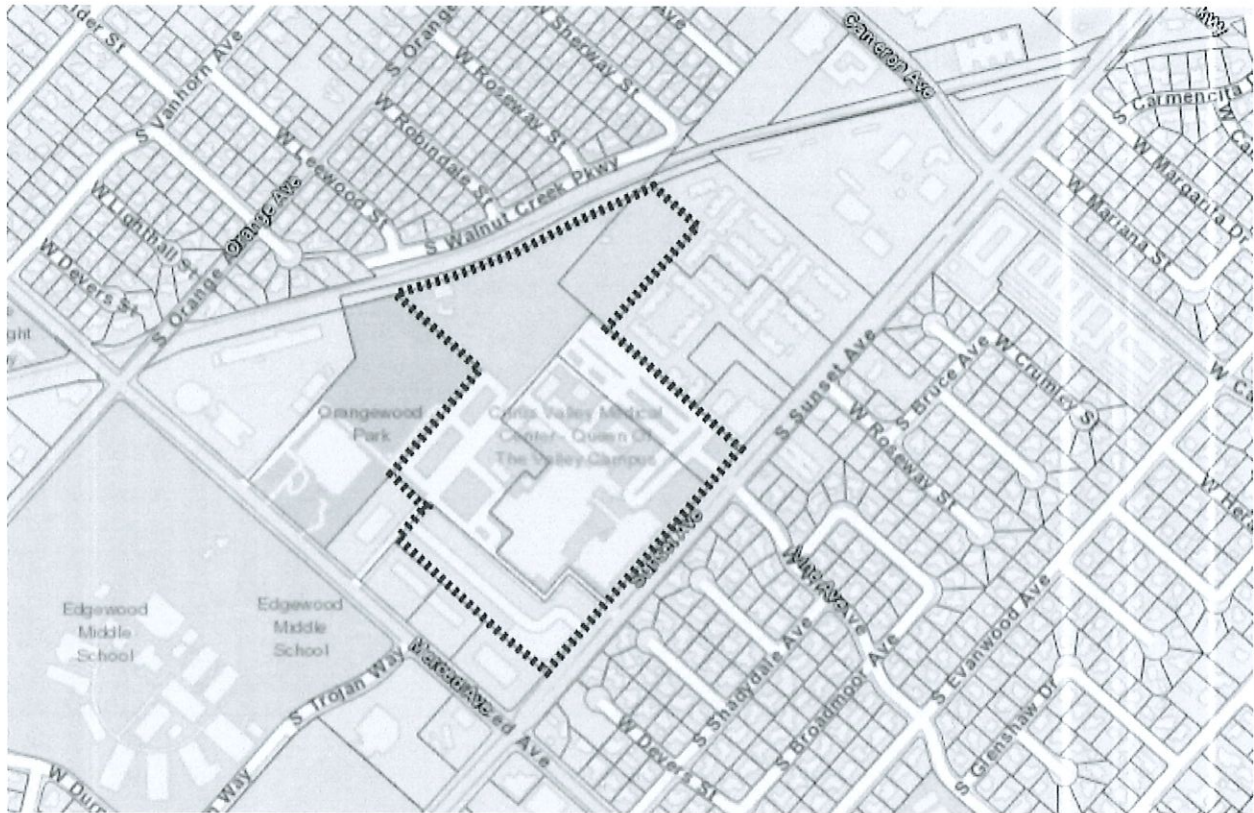
Page 2

Please be advised that the Soboda Band of Luiseno Indians has 30 days upon receipt of this letter to provide input regarding this project.

Sincerely,

Jeff Anderson
Planning Director

Attachment: Project Location Map





GABRIELEÑO BAND OF MISSION INDIANS - KIZH NATION

Historically known as The San Gabriel Band of Mission Indians / Gabrielino Tribal Council
recognized by the State of California as the aboriginal tribe of the Los Angeles basin

City of West Covina
Planning Department

August 16, 2018

Re: AB52 Consultation request for the Queen of the Valley Hospital Campus at 1115 S. Sunset Ave

Dear Jeff Anderson,

Please find this letter as a written request for consultation regarding the above-mentioned project pursuant to Public Resources Code § 21080.3.1, subd. (d). Your project lies within our ancestral tribal territory, meaning belonging to or inherited from, which is a higher degree of kinship than traditional or cultural affiliation. Your project is located within a sensitive area and may cause a substantial adverse change in the significance of our tribal cultural resources. Most often, a records search for our tribal cultural resources will result in a "no records found" for the project area. The Native American Heritage Commission (NAHC), ethnographers, historians, and professional archaeologists can only provide limited information that has been previously documented about California Native Tribes. For this reason, the NAHC will always refer the lead agency to the respective Native American Tribe of the area. The NAHC is only aware of general information and are not the experts on each California Tribe. Our Elder Committee & tribal historians are the experts for our Tribe and can provide a more complete history (both written and oral) regarding the location of historic villages, trade routes, cemeteries and sacred/religious sites in the project area.

Additionally, CEQA now defines Tribal Cultural Resources (TCRs) as their own independent element separate from archaeological resources. Environmental documents shall now address a separate Tribal Cultural Resource section which includes a thorough analysis of the impacts to only Tribal Cultural Resources (TCRs) and includes independent mitigation measures created with Tribal input during AB-52 consultations. As a result, all mitigation measures, conditions of approval and agreements regarding TCRs (i.e. prehistoric resources) shall be handled solely with the Tribal Government and not through an Environmental/Archaeological firm.

In effort to avoid adverse effects to our tribal cultural resources, we would like to consult with you and your staff to provide you with a more complete understanding of the prehistoric use(s) of the project area and the potential risks for causing a substantial adverse change to the significance of our tribal cultural resources.

Consultation appointments are available on Wednesdays and Thursdays at our offices at 910 N. Citrus Ave. Covina, CA 91722 or over the phone. Please call toll free 1-844-390-0787 or email admin@gabrielenoindians.org to schedule an appointment.

*** Prior to the first consultation with our Tribe, we ask all those individuals participating in the consultation to view a video produced and provided by CalEPA and the NAHC for sensitivity and understanding of AB52. You can view their videos at: <http://calepa.ca.gov/Tribal/Training/> or <http://nahc.ca.gov/2015/12/ab-52-tribal-training/>*

With Respect,

Andrew Salas, Chairman

Andrew Salas, Chairman

Albert Perez, treasurer |

PO Box 393, Covina, CA 91723

Nadine Salas, Vice-Chairman

Martha Gonzalez Lemos, treasurer ||

www.gabrielenoindians.org

Christina Swindall Martinez, secretary

Richard Gradias, Chairman of the Council of Elders

gabrielenoindians@yahoo.com

Kent Norton

From: Administration Gabrieleno Indians <admin@gabrielenoindians.org>
Sent: Thursday, September 27, 2018 9:30 AM
To: Administration KNRM; Jeff Anderson
Subject: Re: Queen of the Valley Hospital Campus at 1115 S. Sunset Ave

Good morning Mr.Anderson

I Just wanted to touch bases with you regarding our consultation today . After Chairman Salas reviewed the project a bit further, he concurred there was No need to consult any further . However if resources are discovered during any and all ground disturbances please make sure to contact us . Thank you

On Mon, Aug 20, 2018 at 10:34 AM Jeff Anderson <JAnderson@westcovina.org> wrote:

Brandy,

Your correspondence has been received. We will be in touch to schedule a consultation.

Thank you.

Jeff Anderson

From: Administration Gabrieleno Indians <admin@gabrielenoindians.org>
Sent: Thursday, August 16, 2018 3:21 PM
To: Jeff Anderson <JAnderson@westcovina.org>
Subject: Queen of the Valley Hospital Campus at [1115 S. Sunset Ave](#)

Please see attachment

Sincerely,

Brandy Salas
Admin Specialist
Gabrieleno Band of Mission Indians - Kizh Nation