

## Ehsan, Beth

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**From:** Anna Hoover <ahoover@pechanga-nsn.gov>  
**Sent:** Monday, June 15, 2015 11:19 AM  
**To:** Ehsan, Beth; Loy, Maggie A  
**Cc:** Ebru Ozdil; Andrea Fernandez; Michele Hannah  
**Subject:** Pechanga Tribe Comments on the DEIR for the Valiano Project

Dear Ms. Ehsan;

These comments are written on behalf of the Pechanga Band of Luiseño Indians (hereinafter, “the Tribe”), a federally recognized Indian tribe and sovereign government. The Tribe formally requests, pursuant to Public Resources Code §21092.2, to be notified and involved in the entire CEQA environmental review process for the duration of the above referenced project (the “Project”). If you have not done so already, please add the Tribe to your distribution list(s) for public notices and circulation of all documents, including environmental review documents, archeological reports, and all documents pertaining to this Project. The Tribe further requests to be directly notified of all public hearings and scheduled approvals concerning this Project. Please also incorporate these comments into the record of approval for this Project.

The Tribe submits these comments concerning the Project's proposed impacts to cultural resources in conjunction with the environmental review of the Project. The Tribe has reviewed the Draft Environmental Impact Report (DEIR) for this Project. The Pechanga Band supports the mitigation measures as provided in Subchapter 2.5 and 7.1.5 with a few revisions.

M-CR-2(3): We strongly support the preservation and avoidance of CA-SDI-17,506 as any destruction to sensitive, nonrenewable cultural sites is not only a cumulative impact but a loss to both Tribal and California history. We request that the Developer make all attempts to preserve and protect this site.

M-CR-2(7): We suggest that this measure refer to M-CR-2(11), requiring all cultural materials and archaeological resources, with the exception of human remains/grave goods and ceremonial/sacred items, be collected and transferred to an appropriate curation facility.

M-CR-2(8): The Tribe believes that the Native American representatives must also be required to assist with the significance determination should inadvertent finds be identified. Tribes are better suited and often more aware of their cultural resources and their uses than archaeologists. By eliminating the opportunity for a tribal representative to participate in the significance determination of their resources, the County is eliminating the importance of tribal participation and knowledge regarding their tribal values entirely. Additionally, the Native American representatives must be allowed to participate in the development of all data recovery plans and the proposed mitigation for such resources.

The Pechanga Band further supports any comments and requests made by the San Luis Rey Band of Mission Indians as they participated in all aspects of the environmental document and CEQA process.

The Tribe reserves the right to fully participate in the environmental review process, as well as to provide further comment on the Project's impacts to cultural resources and potential mitigation for such impacts.

The Pechanga Tribe thanks the County of San Diego for consulting with the Tribe and appreciates the continued communication. Please contact me at the below information should you have any comments or questions.

Thank you,

**Anna M. Hoover**  
**Cultural Analyst**

**Dechanga Band of Luiseno Mission Indians**  
**P.O. Box 2183**  
**Temecula, CA 92593**

**951-770-8104 (O)**

**951-694-0446 (F)**

**951-757-6139 (C)**

**[ahcoover@pechanga-nsn.gov](mailto:ahcoover@pechanga-nsn.gov)**