
Appendix E-1

Archaeological Resources Inventory Letter Report

October 15, 2025

18193.02

Matthew Maehara
Taylor Morrison, Southern California Division
6440 Oak Canyon, Suite 200
Irvine, CA 92618

Subject: Archaeological Resources Inventory Letter Report for the Delaney Square Residential Project, City of Azusa, California

Dear Matthew Maehara:

This letter documents the results of Dudek's archaeological resources inventory efforts conducted for the Delaney Square Residential Project (Project), located in the City of Azusa, California. The Project is located within Section 36 of Township 1 North and Range 10 West of the *Azusa, California* U.S. Geological Survey (USGS) 7.5 Minute Series Quadrangle (Figure 1, Project Location). The Project would construct 128 residential units on approximately 9.77 acres encompassing Assessor's Parcel Number (APN) 8628-004-900 (Figure 2, Project Area).

The City of Azusa (City) is the lead agency responsible for compliance with the California Environmental Quality Act (CEQA). In accordance with CEQA and local regulations, Dudek performed a Phase I archaeological resources inventory that included a records search, an archival information review, correspondence with the Native American Heritage Commission (NAHC), and an archaeological resources pedestrian survey of the Project area.

Dudek conducted a California Historical Resources Information System (CHRIS) records search of the Project area and surrounding one-mile radius at the South Central Coastal Information Center (SCCIC). The records search identified six previously recorded cultural resources located within one mile of the Project area, none of which intersect with the Project area. Additionally, Dudek requested a NAHC Sacred Lands File (SLF) search, and results were positive for Native American cultural resources within one mile of the Project area, though the NAHC did not provide details on what the resource(s) are or where they are located.

Dudek archaeologist Brenda Rogers conducted an intensive-level pedestrian survey of the Project area on July 28, 2025. No archaeological resources were identified within the Project area during the survey, though the majority of the ground surface was obscured by structures, playground equipment, hardscape, and turf grass. An archival review also indicated that the Project area has been subject to ground-disturbing activities associated with agricultural use, the construction of W.R. Powell Elementary School circa 1965, and subsequent expansion circa 2005. W.R. Powell Elementary School is considered a historic-era built environment resource and is addressed in the *Built Environment Inventory and Evaluation Report* prepared for the Project by Dudek in 2025 (Dumovich Heywood and Haley 2025).

Overall, Dudek's archaeological resources inventory of the Project indicates that there is low potential for the inadvertent discovery of subsurface archaeological deposits during Project implementation. In consideration of the negative results of the SCCIC records search, archival research, and pedestrian survey, no further archaeological efforts or mitigation, including archaeological construction monitoring, are recommended to be necessary in

support of Project implementation. The Project is unlikely to impact undiscovered archaeological resources. In the unlikely event that archaeological resources are encountered during the exposure of subsurface soils, ground-disturbing work should be immediately halted in the area, and a qualified archaeologist should be retained to evaluate the resource(s). If human remains are found, the Los Angeles County Coroner shall be immediately notified of the discovery in accordance with Section 7050.5 of the California Health and Safety Code.

1 Project Description and Location

The Project is located at 1025 East Mauna Loa Avenue in the City of Azusa, California, and within Section 36 of Township 1 North and Range 10 West of the *Azusa, California* USGS 7.5 Minute Series Quadrangle (Figure 1). The Project area consists of 9.77-acres of developed land that encompasses APN 8628-004-900 (Figure 2). The Project would construct 128 residential units, including a combination of two-story single-family detached cluster homes and two-story attached triplexes and duplexes. Residential amenities would include private and common open space, parking, a tot lot, a barbeque area, a shaded gathering space, and a butterfly garden. The existing school buildings and surface parking lot within the Project area would be demolished to accommodate the Project. As the Institutional/School General Plan land use designation and zone does not allow for residential uses, a General Plan Amendment and a Zone Change would be required.

The Project would be accessible from East Mauna Loa Avenue and North Calera Avenue and internal circulation on the site would be provided by internal streets, driveways, and alleyways. The Project would include a central paseo with a pathway for pedestrian connectivity, landscaping with drought-tolerant plantings and eco-conscious irrigation systems, and energy-efficient utility systems, including electric vehicle charging stations. Electrical utility lines would be converted to below-ground along East Mauna Loa Avenue and North Calera Avenue. Other off-site improvements may be required to connect to existing utilities within existing roadways.

2 Regulatory Framework

The Project is subject to compliance with CEQA and local regulatory conditions. No federal nexus is presently anticipated.

2.1 California Register of Historical Resources

In California, the term “historical resource” includes, but is not limited to, “any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California” (PRC Section 5020.1[j]). In 1992, the California legislature established the California Register of Historical Resources (CRHR) “to be used by state and local agencies, private groups, and citizens to identify the state’s historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change” (PRC Section 5024.1[a]). The criteria for listing resources in the CRHR were expressly developed to be in accordance with previously established criteria developed for listing in the National Register of Historic Place (NRHP), enumerated as follows: According to California Public Resources Code (PRC) Section 5024.1(c)(1–4), a resource is considered historically significant if it (i) retains “substantial integrity” and (ii) meets at least one of the following criteria:

- (1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- (2) Is associated with the lives of persons important in our past.
- (3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
- (4) Has yielded, or may be likely to yield, information important in prehistory or history.

To understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than 50 years old may be considered for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand its historical importance (14 CCR 4852[d][2]).

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the NRHP, and properties listed or formally designated as eligible for listing in the NRHP are automatically listed in the CRHR, as are state landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

2.2 California Environmental Quality Act

The following CEQA statutes (PRC Section 21000 et seq.) and CEQA Guidelines (14 CCR 15000 et seq.) are of relevance to the analysis of archaeological, historic, and Tribal Cultural Resources (TCRs):

- PRC Section 21083.2(g) defines "unique archaeological resource."
- PRC Section 21084.1 and CEQA Guidelines Section 15064.5(a) defines "historical resources." In addition, CEQA Guidelines Section 15064.5(b) defines the phrase "substantial adverse change in the significance of an historical resource"; it also defines the circumstances when a project would materially impair the significance of a historical resource.
- PRC Section 21074(a) defines "Tribal Cultural Resources."
- PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e) set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated cemetery.
- PRC Sections 21083.2(b) and 21083.2(c) and CEQA Guidelines Section 15126.4 provide information regarding the mitigation framework for archaeological and historic resources, including examples of preservation-in-place mitigation measures. Preservation in place is the preferred manner of mitigating impacts to significant archaeological sites because it maintains the relationship between artifacts and the archaeological context and may help avoid conflict with religious or cultural values of groups associated with the archaeological site(s).

More specifically, under CEQA, a project may have a significant effect on the environment if it may cause "a substantial adverse change in the significance of an historical resource" (PRC Section 21084.1; 14-CCR 15064.5[b]).

A “substantial adverse change in the significance of an historical resource,” reflecting a significant effect under CEQA, means “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired” (14 CCR 15064.5[b][1]; PRC Section 5020.1[q]). In turn, the significance of a historical resource is materially impaired when a project does any of the following (14 CCR 15064.5[b][2]):

1. Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register [CRHR]; or
2. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the PRC or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
3. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a lead agency for purposes of CEQA.

Pursuant to these sections, the CEQA inquiry begins with evaluating whether a project site contains any historical resources, then evaluates whether that project will cause a substantial adverse change in the significance of a historical resource such that the resource’s historical significance would be materially impaired.

If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that they cannot be left undisturbed, mitigation measures are required (PRC Sections 21083.2[a]–[c]).

PRC Section 21083.2(g) defines a *unique archaeological resource* as an archaeological artifact, object, or site about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria (PRC Section 21083.2[g]):

4. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
5. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
6. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Impacts on non-unique archaeological resources are generally not considered a significant environmental impact (PRC Section 21083.2[a]; 14 CCR 15064.5[c][4]). However, if a non-unique archaeological resource qualifies as a TCR (PRC Sections 21074[c] and 21083.2[h]), further consideration of significant impacts is required.

CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. These procedures are detailed in PRC Section 5097.98.

2.3 Native American Historic Cultural Sites (California Public Resources Code section 5097 et seq.)

State law addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and establishes the NAHC to resolve disputes regarding the disposition of such remains. In addition, the Native American Historic Resource Protection Act makes it a misdemeanor punishable by up to 1 year in jail to deface or destroy an Indian historic or cultural site that is listed or may be eligible for listing in the CRHR.

2.4 California State Assembly Bill 52

Assembly Bill (AB) 52 of 2014 amended PRC Section 5097.94 and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. AB 52 established that tribal cultural resources must be considered under CEQA and also provided for additional Native American consultation requirements for the lead agency. Section 21074 describes a tribal cultural resource as a site, feature, place, cultural landscape, sacred place, or object that is considered of cultural value to a California Native American tribe and that is either:

- On or determined to be eligible for the California Register of Historical Resources or a local historic register; or
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1.

AB 52 formalizes the lead agency–tribal consultation process, requiring the lead agency to initiate consultation with California Native American groups that are traditionally and culturally affiliated with the project site, including tribes that may not be federally recognized. Lead agencies are required to begin consultation prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report.

Section 1(a)(9) of AB 52 establishes that “a substantial adverse change to a tribal cultural resource has a significant effect on the environment.” Effects on tribal cultural resources should be considered under CEQA. Section 6 of AB 52 adds Section 21080.3.2 to the PRC, which states that parties may propose mitigation measures “capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource.” Further, if a California Native American tribe requests consultation regarding project alternatives, mitigation measures, or significant effects to tribal cultural resources, the consultation shall include those topics (PRC Section 21080.3.2[a]). The environmental document and the mitigation monitoring and reporting program (where applicable) shall include any mitigation measures that are adopted (PRC Section 21082.3[a]).

2.5 California Senate Bill 18

California Senate Bill (SB) 18, which took effect on March 1, 2005, requires local (city and county) governments to consult with California Native American tribes identified by the NAHC for the purpose of protecting, and/or mitigating impacts to cultural places in creating or amending general plans, including specific plans (Government Code Section 65352.3).

2.6 California Native American Graves Protection and Repatriation Act

The California Native American Graves Protection and Repatriation Act (California Repatriation Act), enacted in 2001, required all state agencies and museums that receive state funding and that have possession or control over collections of human remains or cultural items, as defined, to complete an inventory and summary of these remains and items on or before January 1, 2003, with certain exceptions. The California Repatriation Act also provides a process for the identification and repatriation of these items to the appropriate tribes.

2.7 California Health and Safety Code section 7050.5 and Public Resources Code Section 5097.98

CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. As described below, these procedures are detailed in California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98.

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. Health and Safety Code Section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the County coroner has examined the remains (California Health and Safety Code Section 7050.5[b]). If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact the NAHC within 24 hours (California Health and Safety Code Section 7050.5[c]). In accordance with California Public Resources Code Section 5097.98(a), the NAHC will notify the Most Likely Descendant (MLD). With the permission of the landowner, the MLD may inspect the site of discovery. Within 48 hours of being granted access to the site, the MLD may recommend means of treatment or disposition, with appropriate dignity, of the human remains and associated grave goods.

2.8 Guidelines for Determining Significance

According to CEQA (§15064.5b), a project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. CEQA defines a substantial adverse change:

Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.

The significance of an historical resource is materially impaired when a project:

- Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the CRHR; or

- Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its eligibility for inclusion in the CRHR as determined by a lead agency for purposes of CEQA.

Section 15064.5(c) of CEQA applies to effects on archaeological sites and contains the following additional provisions regarding archaeological sites:

- When a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource, as defined in subsection (a).
- If a lead agency determines that the archaeological site is a historical resource, it shall refer to the provisions of Section 21084.1 of the Public Resources Code, and this section, Section 15126.4 of the Guidelines, and the limits contained in Section 21083.2 of the Public Resources Code do not apply.
- If an archaeological site does not meet the criteria defined in subsection (a) but does meet the definition of a unique archaeological resource in Section 21083.2 of the Public Resources Code, the site shall be treated in accordance with the provisions of section 21083.2. The time and cost limitations described in Public Resources Code Section 21083.2 (c–f) do not apply to surveys and site evaluation activities intended to determine whether the project location contains unique archaeological resources.
- If an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment. It shall be sufficient that both the resource and the effect on it are noted in the Initial Study or Environmental Impact Report (EIR), if one is prepared to address impacts on other resources, but they need not be considered further in the CEQA process.

Section 15064.5(d) and (e) contain additional provisions regarding human remains. Regarding Native American human remains, paragraph (d) provides:

When an initial study identifies the existence of, or the probable likelihood of, Native American human remains within the project, a lead agency shall work with the appropriate Native Americans as identified by the Native American Heritage Commission as provided in Public Resources Code SS5097.98. The applicant may develop an agreement for treating or disposing of, with appropriate dignity, the human remains and any items associated with Native American burials with the appropriate Native Americans as identified by the Native American Heritage Commission. Action implementing such an agreement is exempt from:

7. The general prohibition on disinterring, disturbing, or removing human remains from any location other than a dedicated cemetery (Health and Safety Code Section 7050.5); and
8. The requirement of CEQA and the Coastal Act.

Under CEQA, an EIR is required to evaluate any impacts on unique archaeological resources (California Public Resources Code section 21083.2.) A “unique archaeological resource” is defined as:

[A]n archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

(California Public Resources Code section 21083.2(g)). An impact to a non-unique archaeological resource is not considered a significant environmental impact and such non-unique resources need not be further addressed in the EIR (Public Resources Code section 21083.2(a); CEQA Guidelines section 15064.5(c)(4)).

As stated above, CEQA contains rules for mitigation of “unique archaeological resources.” For example, “[i]f it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts to be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. Examples of that treatment, in no order of preference, may include, but are not limited to, any of the following:

1. Planning construction to avoid archaeological sites.
2. Deeding archaeological sites into permanent conservation easements.
3. Capping or covering archaeological sites with a layer of soil before building on the sites.
4. Planning parks, greenspace, or other open space to incorporate archaeological sites.”
(Pub. Resources Code section 21083.2(b)(1)-(4).)

Public Resources Code section 21083.2(d) states that “[e]xcavation as mitigation shall be restricted to those parts of the unique archaeological resource that would be damaged or destroyed by the project. Excavation as mitigation shall not be required for a unique archaeological resource if the lead agency determines that testing or studies already completed have adequately recovered the scientifically consequential information from and about the resource, if this determination is documented in the environmental impact report.”

The rules for mitigating impacts to archaeological resources to qualify as “historical resources” are slightly different. According to CEQA Guidelines section 15126.4(b), “[p]ublic agencies should, whenever feasible, seek to avoid damaging effects on any historic resource of an archaeological nature. The following factors shall be considered and discussed in an EIR for a project involving such an archaeological site:

- A. Preservation in place is the preferred manner of mitigating impacts to archaeological sites.
Preservation in place maintains the relationship between artifacts and the archaeological

context. Preservation may also avoid conflict with religious or cultural values of groups associated with the site.

- B. Preservation in place may be accomplished by, but is not limited to, the following:
1. Planning construction to avoid archaeological sites;
 2. Incorporation of sites within parks, greenspace, or other open space;
 3. Covering the archaeological sites with a layer of chemically stable soil before building tennis courts, parking lots, or similar facilities on the site[; and]
 4. Deeding the site into a permanent conservation easement.

Thus, although section 21083.2 of the Public Resources Code, in addressing “unique archaeological sites,” provides for specific mitigation options “in no order of preference,” CEQA Guidelines section 15126.4(b), in addressing “historical resources of an archaeological nature,” provides that “[p]reservation in place is the preferred manner of mitigating impacts to archaeological sites.”

Under CEQA, “[w]hen data recovery through excavation is the only feasible mitigation,” the lead agency may cause to be prepared and adopt a “data recovery plan,” prior to any excavation being undertaken. The data recovery plan must make “provision for adequately recovering the scientifically consequential information from and about the historic resource.” (CEQA Guidelines section 15126.4(b)(3)(C).) The data recovery plan also “must be deposited with the California Historical Resources Regional Information Center.” (*Ibid.*) Further, “[i]f an artifact must be removed during project excavation or testing, curation may be an appropriate mitigation.” (*Ibid.*)

However, “[d]ata recovery shall not be required for an historical resource if the lead agency determines that testing or studies already completed have adequately recovered the scientifically consequential information from and about the archaeological or historic resource, provided that determination is documented in the EIR and that the studies are deposited with the California Historical Resources Regional Information Center.” (CEQA Guidelines Section 15126.4(b)(3)(D).)

2.9 City of Azusa General Plan

The City of Azusa adopted its General Plan in 2004. The General Plan is a long-range planning document that serves as a roadmap for the City’s goals and policies for the next 20 years. The General Plan’s Chapter 3 – The Built Environment states the City’s historic preservation goals and policies as follows (City of Azusa 2004: 3-47):

Urban Form Goals and Policies

Goal 1 – Protect the historic and significant built and natural resources in the City.

Policy 1.1 - Require development projects to establish the historicity of existing buildings and landscapes and require City review and permission to allow for their removal in accordance with CEQA and the Cultural and Historic Preservation Ordinance.

Policy 1.2 - Consider including the preservation and rehabilitation of historically significant landscapes.

Policy 1.3 - Consider establishing a Route 66 historic designation along Foothill Boulevard.

Historic/Cultural Resources Goals and Policies

Goal 1 - Acknowledge, preserve, and protect the city’s Native American heritage.

Policy 1.1 - Determine, early in the planning process, through field surveys and Native American consultation, whether archaeological or cultural resources are located within a proposed development site.

Goal 2 - Provide the City with open space and cultural/historic areas in the downtown, in the San Gabriel River corridor, and in neighborhoods that can provide educational benefits.

Policy 2.1 - Combine historically and culturally significant sites such as those on the proposed landmark list with recreational learning opportunities, where appropriate. Examples may include the train depot, the Woman's Club, the citrus processing buildings, and the Wells Fargo Building.

Policy 2.2 - Commence the process to designate historic districts that may include a Downtown District, a Sunset/San Gabriel District, a Citrus Packing District, and a Foothill District.

Goal 3 - Preserve and protect places, buildings, and objects that embody the City's social, commercial, architectural, and agricultural history.

Policy 3.1 - Encourage property owners to maintain and preserve the historic properties currently listed on the landmarks list and those properties that may be added in the future. Large-scale examples include Route 66, the Santa Fe Depot, the citrus packing buildings, the mining activities, and the downtown core.

Policy 3.2 - Incorporate natural resources such as the San Gabriel River drainage into development when appropriate as a means of understanding and appreciating the history of the site or area. This may include the mining activities and any prehistoric sites that may be encountered during subsequent studies of the drainage.

Policy 3.3 - Support preservation of historic resources, including providing for adaptive reuse and tax incentives where appropriate.

Policy 3.4 - Integrate the landmark list onto the GIS computer system to as a method to regulate building renovation, expansion, or demolition.

Goal 4 - Promote appreciation and awareness of Azusa history through the school and other public programs and venues.

Policy 4.1 - Work closely with the Azusa Historical Society to improve and maintain the Museum as an integral part of historical interpretation and understanding. Ensure that the Museum reflects cultural diversity and the multiple layers of Azusa's history.

Policy 4.2 - Encourage the use of accurate and historically significant place names and themes.

Policy 4.3 - Working together with the Historical and Cultural Preservation Commission, Azusa Unified School District, and other local schools, the Autry Museum, and APU, consider establishing Azusa Heritage programs that sponsor educational walking tours and other public events highlighting local historical resources and issues.

3 Results

3.1 Records Search

Dudek archaeologist Brenda Rogers conducted a records search of the CHRIS on July 15, 2025, at the SCCIC located on the campus of the California State University, Fullerton. The records search encompassed the entire

Project area and a one-mile search radius. The purpose of the records search is to identify any previously recorded cultural resources that may be located in or adjacent to the Project area and to identify previous studies in the Project vicinity. In addition to a review of previously prepared site records and reports, the records search also included a review of historical maps of the Project area, ethnographies, the NRHP, the CRHR, the California Historic Property Data File, and the lists of California State Historical Landmarks, California Points of Historical Interest, and Archaeological Determinations of Eligibility.

3.1.1 Previous Cultural Resources Studies

The SCCIC records search indicates that 21 previous cultural resources studies have been conducted within a one-mile radius of the Project area (Table 1). None of these studies intersect with the Project area. See Confidential Appendix A for the complete SCCIC records search results and associated documentation.

Table 1. Cultural Resources Studies within One mile of the Project Area

Report Number	Authors	Date	Title
LA-04115	Brechbiel, Brant A.	1998	Cultural Resources Records Search and Literature Review Report for a Pacific Bell Mobile Services Telecommunications Facility: LA 087-03 in the City of Azusa, California
LA-05067	City of Los Angeles	1979	Los Angeles County Road Department Historic Property Survey Gladstone Street- Cash Contract 2854
LA-06688	Billat, Lorna	2000	Nextel Communications Wireless Telecommunications Service Facility CA-6705b/Alosta - Los Angeles County
LA-06698	McKenna, Jeanette A.	2001	A Cultural Resources Evaluation of the Azusa Foothill Drive-in Theatre, 675 E. Foothill Boulevard (route 66) Azusa, Los Angeles County, California
LA-06702	McKenna, Jeanette A.	2001	A Critical Review of the L.A. Conservancy's Evaluation of the Azusa Foothill Drive-in Theatre, Azusa, Los Angeles County, California
LA-07233	Kyle, Carolyn E.	2002	Cultural Resource Assessment for Cingular Wireless Facility Vy222-02, City of Glendora, California
LA-07234	McKenna, Jeanette A.	2004	Historic Property Survey Report: The Azusa Pacific University's Azusa Foothill Drive-in Theatre on Foothill Blvd in the City of Azusa, Los Angeles County, California
LA-07316	Shaver, Noelle C.S.	2004	A Phase I Historical Resources Study for the Proposed Arboreta Residential Development Project in the City of Glendora, Los Angeles County, California
LA-08068	Wlodarski, Robert J.	1996	Draft Report: Peer Review of the Monrovia Nursery Project Cultural Resources Element
LA-08073	Farrell, Nancy	1992	Monrovia Nursery Project Cultural Resources Investigation
LA-08081	Wlodarski, Robert J.	2006	Records Search and Field Reconnaissance Results for Cingular Wireless Telecommunications Site Rs0036-01 (Azusa High School) Located at 240 North Cerritos Avenues, City of Azusa, Los Angeles County, California 91702

Table 1. Cultural Resources Studies within One mile of the Project Area

Report Number	Authors	Date	Title
LA-09259	Bonner, Wayne H.	2007	Cultural Resources Records Search and Site Visit Results for T-Mobile Candidate IE04087-XR (Mod) (Fwy210/Citrus Avenue), 854A East Alosta Avenue, Azusa, Los Angeles County, California
LA-09321	Fryman, Leslie	1996	Cultural Resource Inventory and Evaluation of the Manresa Retreat Property, Azusa, California
LA-09671	Bonner, Wayne H.	2008	Cultural Resources Records Search and Site Visit Results for Royal Street Communications, LLC Candidate LA0402B (Barranca & Gladstone), 5607 Noarth Barranca Ave., Azusa, Los Angeles County, California
LA-10442	Jeffrey Lawrence Cornejo, Jr.	2005	Condition #55 of the Monrovia Nursery Mitigation Monitoring and Reporting Program and Conditions of Approval
LA-10579	Hunt, Kevin and Patrick Maxon	2006	Final- Cultural Resources Survey for the Monrovia Nursery Development Project, Glendora, Los Angeles County, California
LA-10896	Greenwood, David	2004	Historic Properties Survey and Effects Report for the Gold Line Phase II Project (Pasadena to Montclair) Los Angeles and San Bernardino Counties, CA
LA-11112	Clark, Jennifer M.	2010	Request for Section 106 Review for the existing 68 ft high mono-pine located at the Crown Castle site known as Grand Citrus #878065, located at 5607 North Barranca Avenue, Azusa, CA 91702
LA-11643	Puckett, Heather	2011	Lime, 551 North Rockvale Avenue, Azusa, California 91702
LA-12525	Poka, Ervin	2003	NHPA Section 106 Review; Metro Gold Line Phase II Extension Project
LA-12796	Brunzell, David	2010	Cultural Resources Assessment Mountain View Mobile Home Park, Santa Monica, Los Angeles County, California

3.1.2 Previously Recorded Cultural Resources

The SCCIC records search did not identify any cultural resources within the Project area, though it did identify six cultural resources within a one-mile radius of the Project area (Table 2). All six resources are characterized as historic-era cultural resources and include two canals, one leach pit, one commercial building, one single-family property, and one transmission line. The results of this records search and all California Department of Parks and Recreation (DPR) 523 site forms are attached as part of Confidential Appendix A.

Table 2. Previously Recorded Cultural Resources within One Mile of Project Area

Primary Number	Trinomial	Age	Description	CRHR Eligibility
Outside Project Area				
P-19-002777	CA-LAN-002777H	Historic	Canal/ditch and pipe	Not evaluated
P-19-003802	-	Historic	Canal/ditch	Not evaluated
P-19-004901	CA-LAN-004901H	Historic	Leach pit/Cistern	Not eligible
P-19-180677	-	Historic	Commercial Building	Eligible

Table 2. Previously Recorded Cultural Resources within One Mile of Project Area

Primary Number	Trinomial	Age	Description	CRHR Eligibility
Outside Project Area				
P-19-188221	-	Historic	Single-family property	Eligible
P-19-188983	-	Historic	Transmission Line	Eligible

3.2 Review of Historic Topographic Maps and Aerial Photographs

In addition to the SCCIC records search, Dudek conducted an online review of historic aerial photographs and historic topographic maps to better understand the development of the Project area and surrounding vicinity over time.

Historic aerial photographs (historic aerials) of the Project area are available from 1948 to 2022 (NETR 2025). The earliest historic aerial from 1948 depicts the entire Project area and the surrounding areas as agricultural land. On the 1954 historic aerial, the Project area continues to be used for agricultural purposes, however, the construction of residential houses immediately to the east and to the south of the Project area are now observed. On the 1964 historic aerial, construction of W.R. Powell Elementary School is observed. Residential development is also observed to the west, east, and south of the Project area, while to the north is an agricultural field. There are no substantial changes to the Project area until 2005. By 2005, some grading is observed and by 2009, an asphalt paved court is observed. There are no significant changes to the Project area and surrounding vicinity as evidenced in the historic aerials from 2009 to the last available in 2022 (NETR 2025).

Historic topographic maps (historic topos) of the Project area are available for the years of 1897 to 2021 (USGS 2025). The earliest historic topo from 1897 depicts the Azusa Ditch running through the Project area in a north/south direction. There are no changes to the depiction of the Project area as evidenced in the historic topos until 1968. On the 1968 historic topo, the Azusa Ditch is no longer observed, and instead W.R. Powell Elementary School is shown. There are no significant changes to the Project area and surrounding vicinity as evidenced in the historic topos from 1968 to the last available in 2022 (NETR 2025).

As evidenced by this archival review, the Project area has been subject to ground-disturbing activities associated with agricultural use, the construction of W.R. Powell Elementary circa 1964, and subsequent expansion circa 2005. W.R. Powell Elementary School is considered a historic-era built environment resource and is addressed in the *Built Environment Inventory and Evaluation Report* prepared for the Project by Dudek in 2025 (Dumovich Heywood and Haley 2025).

3.3 Review of Geotechnical Report

The *Preliminary Geotechnical Evaluation and Recommendations, Proposed Residential Development, Former Powell Elementary School Site, East Mauna Loa Avenue and North Calera Avenue, Azusa, County of Los Angeles, California* prepared by LGC Geotechnical, Inc. in 2025 (Douglass et al. 2025) summarizes the subsurface exploration of the Project area. A total of eight small-diameter exploratory hollow-stem borings were drilled to depths ranging from approximately 10 to 51.5 feet below the existing ground surface. The primary geologic unit underlying

the Project area is middle Holocene age, young alluvial fan deposits. Based on the results of the borings, the Project area is underlain by native alluvial soils to the maximum explored depth of approximately 51.5 feet below the existing grade. A thin veneer of undocumented artificial fill associated with the former elementary school development is expected to exist across the Project area but was not differentiated on the boring logs. It was also noted that deeper amounts of undocumented fill not encountered in borings may exist beneath the current building footprints and across the Project area (Douglass et al. 2025).

3.4 NAHC Correspondence

Dudek requested an NAHC search of the SLF for the Project area and a one-mile radius on July 17, 2025. The SLF consists of a database of known Native American resources. These resources may not be included in the SCCIC database. The NAHC replied via email on July 30, 2025, stating that the SLF search was completed with positive results. Positive results indicate the presence of Native American cultural resources within one mile of the Project area, and not necessarily directly within the Project area. The NAHC did not provide details on what the resource(s) are or where they are located. Additionally, the NAHC provided a list of Native American tribes and individuals/organizations with traditional geographic associations that might have knowledge of cultural resources in the area. To date, Dudek has not sent outreach letters to the entities identified by the NAHC. See Appendix B for complete documentation of SLF search results.

3.5 Archaeological Resources Pedestrian Survey

Dudek archaeologist Brenda Rogers conducted an intensive-level pedestrian survey of the Project area on July 28, 2025. Standard archaeological procedures and techniques consistent with the Secretary of the Interior's Standards and Guidelines for archaeology were employed during the pedestrian survey. When possible, 5-meter interval survey transects were conducted and oriented in cardinal direction. Where visible, the ground surface was examined for prehistoric artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools, ceramics, fire-affected rock, imported marine shell), soil discoloration that might indicate the presence of a cultural midden, soil depressions, features indicative of the current or former presence of structures or buildings (e.g., standing exterior walls, post holes, foundations), and historic artifacts (e.g., metal, glass, ceramics, building materials). Ground disturbances such as rodent/reptile burrows, cut banks, and drainages were also visually inspected for exposed subsurface materials. All fieldwork was documented using field notes and an Apple Generation 14 iPhone (iPhone) with ESRI Field Maps. Location-specific photographs were taken using the iPhone's 14-mega-pixel resolution camera. All field notes, photographs, and records related to the current study are on file at Dudek's Pasadena, California office.

The Project area is developed as an elementary school and is covered by existing structures, playground equipment, turf grass, and extensive paved and hardscaped surfaces. Ground visibility was variable throughout the Project area. In the southeastern half of the Project area, ground visibility was poor (0%) and was largely obscured by existing structures and hardscape (Exhibit 1). In the northwestern portion of the Project area, where turf grass is present, ground visibility was fair to good (70-80%) (Exhibit 2). Overall, no native soils were observed, and no archaeological resources were identified during the pedestrian survey of the Project area.

4 Summary and Management Considerations

Dudek's archaeological resources inventory of the Project indicates that there is a low potential for the inadvertent discovery of intact subsurface archaeological deposits during Project implementation. Dudek conducted a records search of the Project area and surrounding one-mile radius at the SCCIC. The records search identified six previously recorded cultural resources located within one mile of the Project area, none of which are located within the Project area. A NAHC SLF search was also requested for Project, and results were positive for Native American cultural resources within one mile of the Project area, though the NAHC did not provide details on what the resource(s) are or where they are located.

No archaeological resources were identified within the Project area during the intensive-level pedestrian survey, although approximately half of the ground surface was obscured by structures, playground equipment, hardscape, and turf grass. An archival review also revealed that the Project area has been subject to ground-disturbing activities associated with agricultural use, the construction of W.R. Powell Elementary School circa 1965, and subsequent expansion circa 2005. While alluvial soils are present within the Project area, any intact archaeological deposits that may have once existed have likely been disturbed or destroyed by years of agricultural activity and mass grading associated with the construction of the elementary school.

W.R. Powell Elementary School is considered a historic-era built environment resource and is addressed in the *Built Environment Inventory and Evaluation Report* prepared for the Project by Dudek in 2025 (Dumovich Heywood and Haley 2025).

Overall, Dudek's archaeological resources inventory of the Project indicates that there is low sensitivity for identifying intact subsurface archaeological resources (sites, features, or artifacts) or human remains during Project implementation. No further archaeological efforts or mitigation, including archaeological monitoring, are recommended to be necessary in support of Project implementation. Management recommendations to reduce potential impacts to unanticipated archaeological resources and human remains during construction activities are provided below.

Unanticipated Discovery of Archaeological Resources

In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the Project, all construction work occurring within 50 feet of the find shall immediately stop until a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards can evaluate the significance of the find. Construction activities may continue in other areas, or use existing paths of travel, but should be redirected a safe distance from the find. Avoidance and/or preservation in place should be considered the preferred management approach wherever possible. If the new discovery is evaluated and found to be significant under CEQA and avoidance is not feasible, additional work such as data recovery may be warranted. A data recovery plan shall be developed by the qualified archaeologist in consultation with the City and consulting parties, if applicable. Ground disturbance can continue only after the resources has been properly mitigated with approval by the City.

Unanticipated Discovery of Human Remains

In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the County Coroner shall be immediately notified of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the NAHC in Sacramento within 24 hours. In accordance with California Public Resources Code Section 5097.98, the NAHC must immediately notify the person or persons it believes to be the MLD from the deceased Native American. The MLD shall complete inspection after being granted access to the site and make recommendations for the treatment and disposition, in consultation with the City, of the human remains.

Should you have any questions relating to this report and its findings, please do not hesitate to contact me at 619.949.3082 or kmontifolca@dudek.com or Roshanne Bakhtiary at 760.557.0998 or rbakhtiary@dudek.com.

Respectfully submitted,

Keshia Montifolca, M.A., RPA
Archaeologist

Att.: *Figure 1. Project Location Map*
Figure 2. Project Area Map
Exhibit 1. Overview of the central section of W.R. Powell Elementary School, view facing west.
Exhibit 2. Overview of the northwestern section of the Project area, view facing south.
National Archaeological Database Information
Confidential Appendix A, SCCIC Records Search Results
Appendix B, NAHC Correspondence

cc: *Roshanne Bakhtiary, MA, RPA, Dudek; Brandon Whalen-Castellanos, AICP, Dudek*

5 References

City of Azusa. 2004. Gateway to the American Dream: City of Azusa General Plan. Chapter 3: The Built Environment. April 2004. Accessed September 15, 2025.

<https://www.azusaca.gov/DocumentCenter/View/218/Chapter-3>.

Douglass et al. 2025. *Preliminary Geotechnical Evaluation and Recommendations, Proposed Residential Development, Former Powell Elementary School Site, East Mauna Loa Avenue and North Calera Avenue, Azusa, County of Los Angeles*. Prepared for Taylor Morrison.

Dumovich Heywood, Andrea, and Kathryn Haley. 2025. Built Environment Inventory and Evaluation Report, Delaney Square Residential Project, Los Angeles County, California. Report on file at Dudek, Encinitas, California.

NETR (National Environmental Title Research). 2025. Historic Aerial Photographs for Laguna Niguel, California. Accessed September 17, 2025. <https://www.historicaerials.com/>



Exhibit 1. Overview of the central section of W.R. Powell Elementary School, view facing west.



Exhibit 2. Overview of the northwestern section of the Project area, view facing south.

National Archaeological Database (NADB) Information

Authors:	Keshia Montifolca, MA, RPA and Roshanne Bakhtiary, MA
Firm:	Dudek
Project Proponent:	Taylor Morrison, Southern California Division
Report Date:	October 2025
Report Title:	Archaeological Resources Inventory Letter Report for the Delaney Square Residential Project, City of Azusa, California
Type of Study:	Phase I Archaeological Resources Inventory
Resources:	None
USGS Quads:	Azusa, California Quadrangle, Township 1 North, Range 10 West, Section 36
Acreage:	9.11-acres
Permit Numbers:	N/A
Keywords:	Inventory, Negative, City of Azusa, Delaney Square Residential Project

Confidential Appendix A

SCCIC Records Search Results

Appendix B

NAHC Correspondence

Roshanne Bakhtiary

From: Roshanne Bakhtiary
Sent: Thursday, July 17, 2025 6:52 PM
To: NAHC@NAHC
Subject: DUDEK #18193.02 AB 52, SB 18, and NAHC SLF Search Request
Attachments: DUDEK_18193.02 _NAHC_SB18_AB52_Request_Form.pdf

Dear NAHC,

Please find attached to this email an AB 52 and SB 18 contact list and NAHC Sacred Lands File search request with project location map for the Delaney Square Residential Project (Dudek # 18193.02) located in the City of Azusa, Los Angeles County, California.

Please let me know if you have any questions regarding this project. You can email the results to me at: rbakhtiary@dudek.com.

Thank you,

Roshanne Bakhtiary
Archaeologist



O: 949 373 8307 **C:** 760 557 0998
dudek.com



Local Government Tribal Consultation List Request

Native American Heritage Commission

1550 Harbor Blvd, Suite 100
West Sacramento, CA 95691
916-373-3710
916-373-5471 – Fax
nahe@nahe.ca.gov

Type of List Requested

☐ CEQA Tribal Consultation List (AB 52) – *Per Public Resources Code § 21080.3.1, subs. (b), (d), (e) and 21080.3.2*

☐ General Plan (SB 18) - *Per Government Code § 65352.3.*

Local Action Type:

☐ General Plan ☐ General Plan Element ☒ General Plan Amendment

☐ Specific Plan ☐ Specific Plan Amendment ☐ Pre-planning Outreach Activity

Required Information

Project Title: Delaney Square Residential PN 18193.02

Local Government/Lead Agency: City of Azusa, California

Contact Person: Roshanne Bakhtiary

Street Address: 225 S Lake Ave, Suite 225-M210

City: Pasadena, California

Zip: 91101

Phone: (760) 557-0998

Fax: _____

Email: rbakhtiary@dudek.com

Specific Area Subject to Proposed Action

County: Los Angeles

City/Community: Azusa

Project Description:

Single family residential development on approximately 10-acres of land currently zoned for institutional/school.

Additional Request

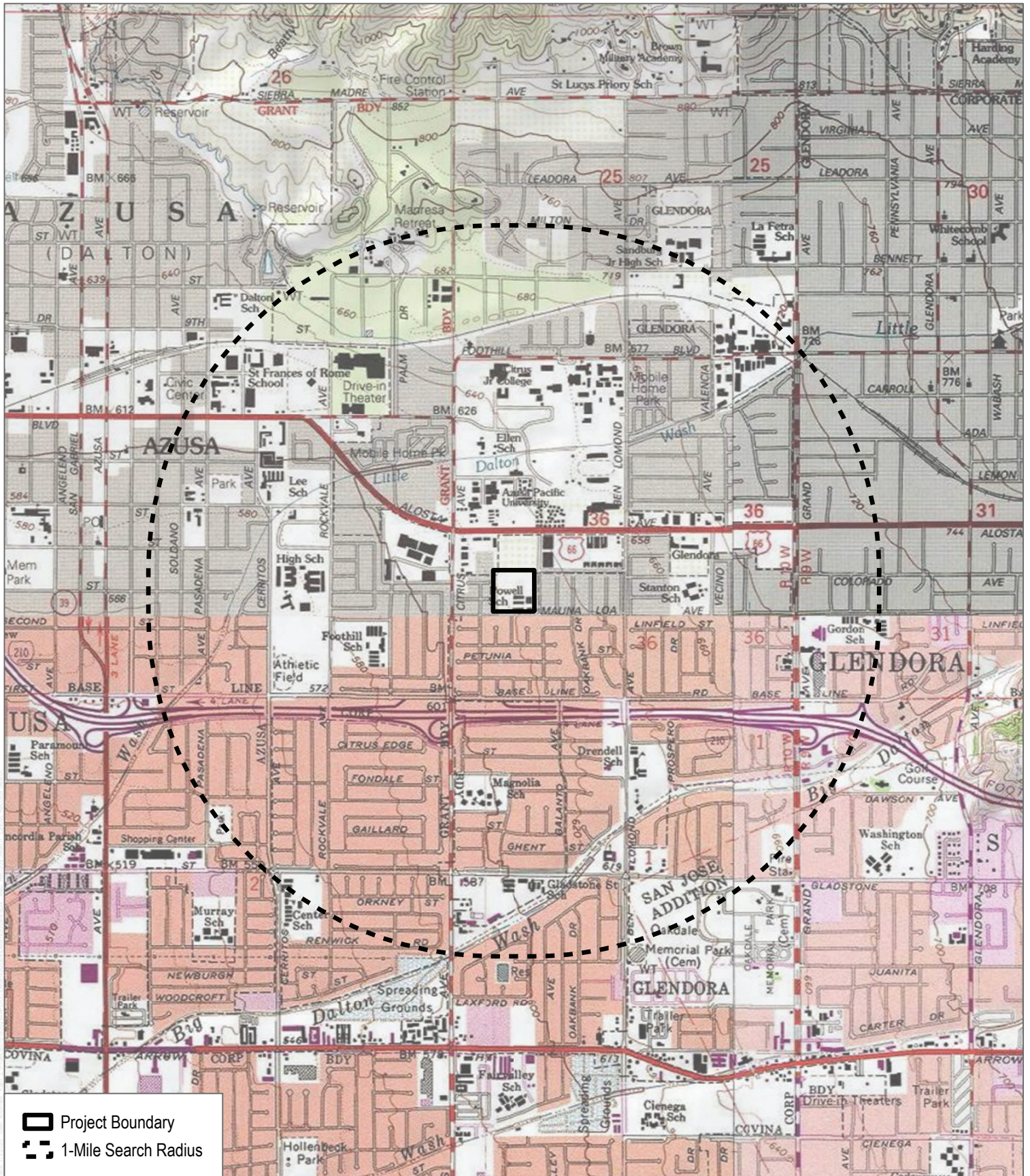
☐ Sacred Lands File Search - *Required Information:*

USGS Quadrangle Name(s): Azusa, California

Township: 1N

Range: 10W

Section(s): 35,36



SOURCE: USGS 7.5-Minute Series 1:24,000
 Azusa Quadrangle - Township 1N Range 10W Section 35-36



Records Search

Delaney Square Residential Project

Roshanne Bakhtiary

From: Carlos, Melina@NAHC <Melina.Carlos@nahc.ca.gov>
Sent: Wednesday, July 30, 2025 4:29 PM
To: Roshanne Bakhtiary
Cc: Gabrieleno Administration
Subject: Delaney Square Residential PN 18193.02 Project
Attachments: AB52 Yes Delaney Square Residential PN 18193.02 Project 07.30.2025.pdf; Delaney Square Residential PN 18193.02 Project 07.30.2025.xlsx

Good afternoon,

Attached is the response to the project referenced above. If you have any additional questions, please feel free to contact our office email at nahc@nahc.ca.gov.

Best,

Melina Carlos

Cultural Resources Analyst
Native American Heritage Commission
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
(916) 373-3716



**NATIVE AMERICAN HERITAGE COMMISSION**

July 30, 2025

Roshanne Bakhtiary
Dudek**Via Email to: rbakhtiary@dudek.com**CHAIRPERSON
Reginald Pagaling
ChumashVICE-CHAIRPERSON
Buffy McQuillen
Yokayo Pomo, Yuki,
NomlakiSECRETARY
Sara Dutschke
MiwokPARLIAMENTARIAN
Wayne Nelson
LuiseñoCOMMISSIONER
Isaac Bojorquez
Ohlone-CostanoanCOMMISSIONER
Stanley Rodriguez
KumeyaayCOMMISSIONER
Reid Milanovich
CahuillaCOMMISSIONER
Bennae Calac
Pauma-Yuima Band of
Luiseño IndiansCOMMISSIONER
VacantACTING EXECUTIVE
SECRETARY
MICHELLE CARR**NAHC HEADQUARTERS**
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov**Re: Tribal Consultation Under CEQA, Delaney Square Residential PN 18193.02 Project, Los Angeles County**

To Whom It May Concern:

Pursuant to your request, attached is a consultation list of tribes that are traditionally and culturally affiliated with the geographic area of the above-listed project. Additionally, a search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed based on the information submitted for the above referenced project. The results were positive. Please contact the Gabrieleno Band of Mission Indians / Kizh Nation on the attached list for more information. Be aware that tribes do not always record their sacred sites in the SLF, nor are they required to do so. As such, an SLF search is not a substitute for consultation with all tribes that are traditionally and culturally affiliated with a project's geographic area. Please contact all of the listed tribes as they may have information about sacred sites within the project area that is not listed with the NAHC.

Additionally, the NAHC recommends that agencies include with their notification letters, information regarding any cultural resources assessment that has been completed on the area of potential effect (APE), such as:

1. The results of any record search that may have been conducted at an Information Center of the California Historical Resources Information System (CHRIS), including, but not limited to:

- A listing of any and all known cultural resources that have already been recorded on or adjacent to the APE, such as known archaeological sites;
- Copies of any and all cultural resource records and study reports that may have been provided by the Information Center as part of the records search response;
- Whether the records search indicates a low, moderate, or high probability that unrecorded cultural resources are located in the APE; and
- If a survey is recommended by the Information Center to determine whether previously unrecorded cultural resources are present.

2. The results of any archaeological inventory survey that was conducted, including:

- Any report that may contain site forms, site significance, and suggested mitigation measures.

All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure in accordance with Government Code section 6254.10.

3. The result of the Sacred Lands File check conducted through the Native American Heritage Commission.
4. Any ethnographic studies conducted for any area including all or part of the APE; and
5. Any geotechnical reports regarding all or part of the APE.

Lead agencies should be aware that records maintained by the NAHC and CHRIS are not exhaustive and a negative response to these searches does not preclude the existence of a tribal cultural resource. A tribe may be the only source of information regarding the existence of a tribal cultural resource, which is why consultation is vital.

This information will aid tribes in determining whether to request formal consultation. If consultation is requested, having the information beforehand will help to facilitate the process.

If you receive notification of a change of address or phone number from a tribe, please inform the NAHC. With your assistance, we can assure that our consultation list remains current.

If you have any questions, please contact me at my email address: melina.carlos@nahc.ca.gov

Sincerely,

Melina Carlos

Melina Carlos
Cultural Resources Analyst

Attachment

Native American Heritage Commission
Native American Contact List
Los Angeles County
7/30/2025

Tribe Name	F/N	Contact	Address	Phone	Email Address	Cultural Affiliation	Counties
Cahuilla Band of Indians	F	BobbyRay Esparza, Cultural Director	52701 CA Highway 371 Anza, CA, 92539	(951) 763-5549	besparza@cahuilla-nsn.gov	Cahuilla	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego
Cahuilla Band of Indians	F	Anthony Madrigal, Tribal Historic Preservation Officer	52701 CA Highway 371 Anza, CA, 92539	(951) 763-5549	anthonymad2002@gmail.com	Cahuilla	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego
Cahuilla Band of Indians	F	Erica Schenk, Chairperson	52701 CA Highway 371 Anza, CA, 92539	(951) 590-0942	chair@cahuilla-nsn.gov	Cahuilla	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego
Gabrieleno Band of Mission Indians - Kizh Nation	N	Andrew Salas, Chairperson	P.O. Box 393 Covina, CA, 91723	(844) 390-0787	admin@gabrielenoindians.org	Gabrieleno	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura
Gabrieleno Band of Mission Indians - Kizh Nation	N	Christina Swindall Martinez, Secretary	P.O. Box 393 Covina, CA, 91723	(844) 390-0787	admin@gabrielenoindians.org	Gabrieleno	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura
Gabrieleno/Tongva San Gabriel Band of Mission Indians	N	Anthony Morales, Chairperson	P.O. Box 693 San Gabriel, CA, 91778	(626) 483-3564	GTTribalcouncil@aol.com	Gabrieleno	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura
Gabrielino Tongva Indians of	N	Robert Dorame, Chairperson	P.O. Box 490	(562) 761-6417	gtongva@gmail.com	Gabrielino	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura

Tribe Name	F/N	Contact	Address	Phone	Email Address	Cultural Affiliation	Counties
California Tribal Council			Bellflower, CA, 90707				
Gabrielino Tongva Indians of California Tribal Council	N	Christina Conley, Cultural Resource Administrator	P.O. Box 941078 Simi Valley, CA, 93094	(626) 407-8761	christina.marsden@alumni.usc.edu	Gabrielino	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura
Gabrielino/Tongva Nation	N	Sandonne Goad, Chairperson	106 1/2 Judge John Aiso St., #231 Los Angeles, CA, 90012	(951) 807-0479	sgoad@gabrielino-tongva.com	Gabrielino	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura
Gabrielino-Tongva Tribe	N	Sam Dunlap, Cultural Resource Director	P.O. Box 3919 Seal Beach, CA, 90740	(909) 262-9351	tongvatcr@gmail.com	Gabrielino	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura
Gabrielino-Tongva Tribe	N	Charles Alvarez, Chairperson	23454 Vanowen Street West Hills, CA, 91307	(310) 403-6048	Chavez1956metro@gmail.com	Gabrielino	Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura
Santa Rosa Band of Cahuilla Indians	F	Steven Estrada, Tribal Chairman	P.O. Box 391820 Anza, CA, 92539	(951) 659-2700	sestrada@santarosa-nsn.gov	Cahuilla	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego
Santa Rosa Band of Cahuilla Indians	F	Vanessa Minott, Tribal Administrator	P.O. Box 391820 Anza, CA, 92539	(951) 659-2700	vminott@santarosa-nsn.gov	Cahuilla	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego
Santa Rosa Band of Cahuilla Indians	F	Mercedes Estrada, Cultural Director	P.O. Box 391820 Anza, CA, 92539	(951) 659-2700	mestrada@santarosa-nsn.gov	Cahuilla	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego

Tribe Name	F/N	Contact	Address	Phone	Email Address	Cultural Affiliation	Counties
Soboba Band of Luiseno Indians	F	Jessica Valdez, Cultural Resource Specialist	P.O. Box 487 San Jacinto, CA, 92581	(951) 663-6261	jvaldez@soboba-nsn.gov	Cahuilla Luiseno	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego
Soboba Band of Luiseno Indians	F	Joseph Ontiveros, Tribal Historic Preservation Officer	P.O. Box 487 San Jacinto, CA, 92581	(951) 663-5279	jontiveros@soboba-nsn.gov	Cahuilla Luiseno	Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego

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 Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for consultation with Native American tribes under Public Resources Code Sections 21080.3.1 for the proposed Delaney Square Residential PN 18193.02 Project, Los Angeles County.